

Privacy Policy - Last updated May 23, 2018

This privacy policy (this "**Policy**") explains how personal information is collected, used, and disclosed by Kingdom Cause Community, and its subsidiaries (collectively, "**Kingdom Cause Community**", "**we**", "**our**", or "**us**"). This Policy applies to visitors and users (individually, "**you**") of Kingdom Cause Community's website, applications, and other online services (each, a "**Site**", and collectively, our "**Sites**").

By visiting or using our Sites, to the extent permitted by applicable law, you are consenting to us gathering and processing information about you in accordance with this Policy, although consent may not be required for all the elements described in this Policy. For types of information or processing, we may provide you with choices or request your further consent related to what information we collect and how we may process it.

What is the purpose of this Privacy Policy?

Kingdom Cause Community Luton is a "data controller" which means we have to tell you certain information when processing your personal information. We may collect information from you in person or we may ask you to fill in paper forms or input information into select third party systems that the charity uses.

If you have any queries about this Privacy Policy or how we use your personal information, please contact Kingdom Cause Community Luton, 39-41 New Bedford Road, Luton, LU1 1HS Our Data Protection Lead is **Lydia Joy** who can be contacted at the above address or email at: privacy@kingdomcause.community

This Privacy Policy relates to your use of the Sites and tells you:

- What personal information we collect about you when you use the Services
- How we collect your personal information in the Services
- How we use your personal information
- Who we may share your personal information with
- Any transfer of personal information outside of the European Economic Area (EEA)
- How long we keep your personal information
- What we do to protect your personal information
- What choices you have in relation to your personal information

We last updated this Privacy Policy on May 23, 2018.

Personal Information we process about you

What information we process about you

We may collect the following information about you:

- your name and address
- your home (landline) phone number
- your mobile phone number
- your email address
- your marital status
- your age and gender
- information about your family
- your education and employment
- your role(s) within the charity (if appropriate)
- any status as a representative for the charity
- attendance at meetings, events and training
- to carry out a DBS check
- the result of a DBS check
- information about your use of the Services (e.g. when you have logged in, what pages you visited)
- information we collect and record as part of pastoral care (this will include anything you tell us unless you tell us not to record it)
- payment details when booking events
- donations to the charity
- Any information you provide to us
- Any teams or groups you are involved with
- When you are unavailable for serving on rota
- Dates and times that you are on a rota

Sensitive Personal Information

We may also collect, store and use the following “special categories” of sensitive personal information (if you give us this information)

- Information about your health, including any mental or physical conditions that you notify us about
- Your religious beliefs
- Your racial origin
- Your sexual orientation
- Any criminal record

Personal Information you give us

We may collect personal information from you when you visit our charity shop and speak to us in person. You may also fill in one of our paper forms, and/or a form available in a different electronic system.

Device Information.

When you visit our Sites or open communications (such as emails), some information is automatically collected from devices (e.g. mobile, computer, laptop, tablet) used to visit or use our Sites including, but not limited to, operating system, access times, browser information (e.g. type, language, and history), settings, and other data about your device that we use to provide the services or as otherwise described in this Policy ("**device information**"). We may also collect information about your usage and activity on our Sites using certain technologies, such as cookies, web beacons and other technologies

Personal Information we collect automatically

When you use the Sites, we may collect certain information automatically such as:

- IP addresses (the name your computer/device uses to identify itself to us)
- Your activity in the Sites including times and dates of visits
- Information on your location
- other websites you may have visited

Cookies

We may use cookies to collect information automatically. A cookie is a small file of data which our website places on your computer's hard drive. The cookies give us information such details of your visits to our website and information about other websites that you visit.

Cookies allow websites to respond to you as an individual and let us tailor our website to your needs, likes and dislikes by gathering and remembering information about you. We use cookies to help us to provide you with a better website.

How to delete and control cookies

Most computers automatically accept cookies but you can change your settings so that you will not receive cookies and you can also delete existing cookies from your computer.

If you do change your settings, you may find that some parts of our website will not function properly. If you do not adjust your settings, you will accept cookies provided by this website.

To find out how to delete cookies or adjust their settings please visit <http://www.allaboutcookies.org/>.

How we use your Personal Information

We may use your information for the following purposes ("**Purposes**"), to provide you with the services, products, and functionality offered on our Sites and fulfill your requests, including, but not limited to, making bookings, making donations, communicate with you about your donations or use of our Sites, services, products and/or functionality; respond to, or follow up on, your comments and questions, and otherwise provide customer service; communicate with you about special delegate offers and other marketing communications; operate and improve our Sites, products, services, and functionality; authenticate your credit or debit card account information, if applicable; tailor your experience on our Sites, including search results and displaying relevant advertising; provide information, services and products to our clients, including subcontractors and affiliates; link or combine with other information we get from third parties to help understand your needs and provide you with better service; perform statistical analysis; protect, investigate, and deter against fraudulent, unauthorised, or illegal activity; comply with our policies, procedures and legal obligations; and as otherwise consented to by you and as required or permitted by applicable law.

If you do not provide us with certain of your information, we may not be able to fulfill the requested Purpose of collection, such as to respond to your queries or provide our Sites to you.

Where you have consented to us using your personal information

Examples of how we may use your information with consent:

- We may ask for your consent to send marketing communications out to you, including information about our events and other marketing materials
- We may also ask for consent where you have given us information as part of our pastoral care and asked us to use it for a certain purpose.

Where we need to perform the contract we have entered into with you

Examples of how we may use your information in order to comply with a contract that we have entered into with you:

- to buy tickets for events
- to administer the Sites (such as troubleshooting, data analysis, research)
- to tell you about changes to our website, software or services that will affect your use them
- to help us (or the software developers) improve the Sites

1. Where we need to comply with a legal obligation

Examples of how we may use your information to fulfil a legal obligation

- keeping records for gift aid purposes
- to prevent and detect fraud
- to protect children and vulnerable adults
- to get your feedback on the Sites

HOW WE USE SENSITIVE PERSONAL INFORMATION

“**Special categories**” of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit consent recorded in writing (e.g. where you tell us information in order to obtain support and pastoral care from us – for example this could relate to physical or mental health).
2. Where we need to carry out our legal obligations (e.g. ensure DBS checking is done where appropriate)
3. Where it is needed in the public interest and in line with our data protection policy.
4. Where It Is needed In connection with our children and vulnerable adults protection policy

Less commonly, we may process this type of information where it is needed to protect your interests (or someone else’s interests) and you are not capable of giving your consent, or where you have already made the information public

What this means in practice

We may use your sensitive personal information in the following ways:

- your mental or physical health, racial origin, sexual orientation or criminal record in order to provide you with support and pastoral care. We may also use this information to help you access support and benefits if appropriate and requested by you
- your religious beliefs in order to provide you with support. We may also use this information to help you access support and benefits if appropriate and requested by you
- your DBS check (which may contain information relating to criminal offences or presence on a register) to decide your suitability for roles in the charity

In all cases where we require consent, we will seek your written consent or record your consent in writing to allow us to process certain sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that

you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

Sharing your Personal Information

Other third parties

We may share your information with certain third parties including:

- With workers and/or volunteers within our charity so that they can provide you with support and pray for you
- Other charities – if you request us to pass on your information either to them or from them
- Support services and benefits providers (e.g. local authorities, your doctor)
- Our suppliers for the performance of any contract we enter into with them or you
- Our software providers who need to see your information in order to keep our website up and running
- Analytics and search engine providers who analyse information about your use of our website and help us to tailor the product and offers that we offer to you and other users

We work with the following organisations:

- Square (for collecting card payments and/or donations)
- GoCardless (for collecting online direct debit donations)
- MailChimp (for marketing communications)
- Google Suite (for sending/receiving emails)
- HSBC (banking services)

Legal Requirements and Law Enforcement

We may also disclose your personal information to third parties:

- If we are required by law, or in order to enforce or apply our terms of use. This includes exchanging information with other organisations such as law enforcement agencies.

Third Party Privacy Policies

The Sites may contain links to websites owned by other organisations. If you follow a link to another website, these websites will have their own privacy policies. We suggest that you check the policies of any other websites before giving them your personal information as we cannot accept responsibility for any other website.

Keeping your Personal Information

How we store your personal information

The security of your personal information is important to us.

We use appropriate technical and organisational measures to safeguard personal information and encryption technology where appropriate to enhance privacy and help prevent information security breaches.

Any personal information that we provide to you will be held within the EEA.

All third parties who provide services to us or our software provider(s) are required to sign a contract requiring them to have appropriate technical, administrative and physical procedures in place to ensure that your information is protected against loss or misuse.

All information you provide to us is stored on our secure servers or on secure servers operated by a third party. Information on our third-party providers can be found above.

Retention of information

We only hold your personal information for as long as necessary for the purposes for which we collected your information.

We have a retention policy which lays down timescales for the retention of information.

We have set these timescales in accordance with any applicable legislation and where none exists then we will keep your information for the duration of any contract that you have entered into with us and then for a period of 7 years after which time it will be deleted.

Emails

If you chose to send us information via email, we cannot guarantee the security of this information until it is delivered to us.

Your rights

Access to information

You have the right to access information that we hold about you. If you wish to receive a copy of the information that we hold, please contact us at:
privacy@kingdomcause.community or write to us at the address above.

Changing or deleting your information

You can ask us at any time to change, amend or delete the information that we hold about you or ask us not to contact you with any further marketing information. You can also ask us to restrict the information that we process about you.

You can request that we change, amend, delete your information or restrict our processing by emailing us at privacy@kingdomcause.community

Right to prevent Automated decision making

You have a right to ask us to stop any automated decision making. We do not intentionally carry out such activities, but if you do have any questions or concerns we would be happy to discuss them with you and you can contact us at privacy@kingdomcause.community.

Transferring Personal Information

You have the right to request that your personal information is transferred by us to another organisation (this is called “data portability”). Please contact us at privacy@kingdomcause.community with the details of what you would like us to do and we will try our best to comply with your request. It may not be technically feasible, but we will work with you to try and find a solution.

Complaints

If you make a request to us under this Privacy Policy and you are unhappy with the response, you can ask for the request to be reviewed under our internal complaints procedure. Our internal complaints procedure allows your request to be reviewed by Paul Cooper, Pastor, who will do their best to try and resolve the issue.

If you have been through the internal complaints procedure and are still not happy with the result, then you have the right to complain to the Information Commissioner’s Office. They can be contacted as follows:

Website: www.ico.org.uk

Telephone: 03031231113

Address: Information Commissioner’s Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Changes to our Privacy Policy

We review our Privacy Policy on a frequent basis to check that it accurately reflects how we deal with your information and may amend it if necessary. You should check this page regularly to see the most up to date information.

How to Contact us

If you have any questions about this Policy or information we have collected about you, please contact us by email at privacy@kingdomcause.community or by postal mail at:

Kingdom Cause Community
39-41 New Bedford Road,
Luton, LU1 1HS

APPENDIX A - Our Contact Details

Kingdom Cause Community and its subsidiaries (collectively, "**we**", "**our**" or "**us**") provide services in solely within the UK. As detailed in our Privacy Policy (the "**Policy**"), Kingdom Cause Community acts as a data controller of certain personal information about users of Kingdom Cause Community's websites, applications, and other online services (individually referred to as "**you**") and as a data processor of other personal information. When we act as a data controller of your personal information, the Kingdom Cause Community entity that is the data controller is a charity registered in England and Wales, with its registered office at

39-41 New Bedford Road,

Luton,

LU1 1HS

Tel.: +44 (0)1582 520 521

E-Mail: info@kingdomcause.community

Charity Registration: 1136475

Authorised representatives: Rob Joy (Founder & Chair of Trustees), same address as Kingdom Cause Community.

All information concerning you that Kingdom Cause Community collects will be for the purposes described in the Policy or disclosed to you on our Sites or otherwise in connection with our services. The above data controller is responsible for administration of such personal information subject to such joint use by Kingdom Cause Community, including (for example, accepting and responding to requests for disclosure and complaints).

Appendix C - Cookies and Interest-Based Advertising Policy

Cookies and similar tracking technologies, such as beacons, scripts, and tags, are small bits of code, usually stored on a user's computer hard drive or device, which enable a website to "personalize" itself for each user by remembering information about the user's visit to the website. We may also use these technologies within emails or other communications we send to you. Where required by law, we will obtain your consent before we collect this information from your device or use these technologies.

As described in more detail below, our Sites may use cookies to store your preferences, display content based upon what you view on our Sites to personalize your visit, analyze trends, administer the Sites, track users' movements around the Sites, serve targeted advertising and gather demographic information about our user base as a whole. On mobile websites and mobile apps, we may use Anonymous Device IDs and/or Advertiser Identifiers in a manner similar to our use of cookies on our websites. To opt-out of advertising and certain other cookies, please see the opt-out links below.

Kingdom Cause Community Cookies (First Party Cookies). We, at Kingdom Cause Community, may use our own cookies to improve your web-browsing experience. For example, we may use these cookies to remember your language preference or city, or to keep you in a logged in state so the Sites does not require you to log in repeatedly to access different pages. Kingdom Cause Community's cookies, if and where used, are associated with other data we collect from you. However, no third party may use the information we collect through our Kingdom Cause Community cookies for their own purposes. Deletion of these types of cookies will result in limited functionality of our Sites and services.

Third Party Cookies. We work with third-parties that may place cookies on our Sites to provide their services, including:

- **Ad Targeting.** We may work with third-party advertising companies to serve ads while you are visiting our Sites and permit these companies to place and access their own cookies on your computer in the course of serving advertisements on our Sites. These companies may use information obtained through their cookie (which does not include your name, address, e-mail address or telephone number) about your visits to our and other websites, in combination with non-personally identifiable information about your purchases and interests from other online sites in order to provide advertisements about goods and services of interest to you. Other companies' use of their cookies is subject to their own privacy policies and not ours. **Data Providers:** We may also allow data providers to collect web log data from you (which may include IP address, where permitted, and information about your browser or operating system), when you visit our Sites, or place or recognize a unique cookie on your browser to enable you to receive customized ads or content. These cookies contain no personally identifiable information. The cookies may reflect de-identified demographic or other data linked to data you voluntarily have submitted to us, e.g. your email address, that we may share with data providers solely in hashed, non-human readable form.
- **Analytics/Measurement.** We also use third-party analytics cookies to gain insight into how our visitors use the Sites, to find out what works and what doesn't, to optimize and improve

our Sites and to ensure we continue to be interesting and relevant. The data we gather includes which web pages you have viewed, which referring/exit pages you have entered and left from, which platform type you have used, date and time stamp information and details such as the number of clicks you make on a given page, your mouse movements and scrolling activity, the search words you use and the text you type while using our Sites. We also make use of analytics cookies as part of our online advertising campaigns to learn how users interact with our Sites after they have been shown an online advertisement, which may include advertisements on third-party websites.

• **Google Analytics 360 Suite and Google Analytics Advertising.** Our Sites use Google Analytics 360 Suite, including and Google Analytics Advertising, which are web analytics and analytics advertising services provided by Google, Inc., which use third party cookies. Where required, our Sites have activated the IP-address anonymization functionality so that the IP-address of the user is shortened by Google. Our Sites may also use the following Google Analytics Advertising features: Google Remarketing with Analytics, Google Segments, Double Click by Google, Adwords and BigQuery. These features use third party cookies to collect information about our website traffic by tracking users across websites and across time and generating reports for us to better understand our website users and to create audiences for our advertisements based on such understanding.

Mobile Devices, Anonymous Device Identifiers and Hashed IDs. We and/or data providers that we have engaged may collect and store a unique identifier matched to your mobile device, in order to deliver customized ads or content while you use applications or surf the internet, or to identify you in a unique manner across other devices or browsers. In order to customize these ads or content, we or a third-party data partner may collect de-identified demographic or other data about you which you have either voluntarily submitted to us, e.g. your email address, or, which has been passively collected from you, such as your device identifier or IP address, where permitted. However, we will share your email address solely in hashed, non-human readable form.

OPTING OUT OF COOKIES AND TRACKING TECHNOLOGIES. We provide you with choice over the use of cookies as described in this policy.

First Party Cookies. If you'd rather we didn't use Kingdom Cause Community cookies when you visit us, click <http://www.allaboutcookies.org/manage-cookies/clear-cookiesinstalled.html> for information on how to configure your browser settings to reject cookies. Please note, disabling these types of cookies will result in limited functionality of our Sites and services, where these cookies are used.

Third Party Cookies. If you would like to opt-out of third-party cookies, here are some options:

- If you would like to generally (i.e. not just for this Site) opt-out of receiving personalized ads from third party advertisers and ad networks who are members of the Network Advertising Initiative (NAI) or who follow the Digital Advertising Alliance's (DAA) Self-Regulatory principles for Online Behavioral Advertising by visiting the opt-out pages on the NAI website and DAA website. If you are in the European Union, please click <http://www.youronlinechoices.eu/> to opt out.

- In order to control the collection of data for analytical purposes by Google Analytics, you may download and install the Google Analytics Opt-out Browser Add-on <https://tools.google.com/dlpage/gaoptout>. To control the collection of data for analytical advertising purposes by Google Analytics Advertising, you may also visit the Google Ad Settings page <https://www.google.com/safetycenter/tools/#!/#manage-your-adspreferences>. Please remember that changing your settings with certain browsers and ad networks will not carry your privacy choices across browsers and other ad networks.
- If you wish to block other cookies, including those being served by companies that are not part of the NAI or DAA, you can configure your browser settings to reject cookies. You can also delete all cookies that are already on your computer's hard drive by searching for and deleting files with "cookie" in it.

Do-Not-Track Signals. We currently do not employ technology that recognizes “donot-track” signals from your browser.

Please keep in mind that, without cookies, you may not have access to certain features on our Sites, including access to your profile/account and certain personalised content. Removing all cookies from your computer could also affect your subsequent visits to certain websites, including our Sites, by requiring that, for example, you enter your login name when you return to that website. Please note that even if you opt-out, you will still see ads, but they will not be targeted based upon the information collected through these tracking technologies.

Privacy Policy. Please review our privacy policy for additional details about how we collect, use, and disclose information in connection with the Services.

Appendix D

If you are a resident of the European Union ("EU") or the United Kingdom ("UK"), you may have certain additional rights, as detailed below. For purposes of this notice, "personal data" has the meaning ascribed in the EU General Data Protection Regulation .

PROCESSING BASES AND CONSEQUENCES

To process your personal data, we rely on the following legal bases:

- For the performance of a contract we have with you (such as if you use our services to undertake a decorating or renovation project, we'll use your information to carry out our obligation to complete and administer your booking).
- For compliance with a legal obligation to which we are subject (such as tax obligations and when we are obliged to comply with lawful requests from competent authorities such as law enforcement) .
- For the purposes of our legitimate interests (such as tailoring your experience on our Sites and for fraud detection), provided that such processing does not outweigh your rights and freedoms .

The processing may also be pursuant to other applicable legal bases for data processing, especially provisions set out by Member State law. To the extent that a legal ground described above would not apply to processing of your Personal data by us, we will seek your consent for such specific purpose in accordance with applicable law.

YOUR RIGHTS

To the extent a specific element of our processing of your personal data relies upon your consent, you may withdraw such consent at any time with future effect. Such a withdrawal will not affect the lawfulness of the processing prior to the consent withdrawal. Section VI of the Privacy Policy describes the options we provide you to easily decline or withdraw your consent.

If you wish to object to the processing of your personal data on the basis of legitimate interest and no opt-out mechanism is available to you directly, please Contact Us - Appendix A .

If you do not provide us with certain of your personal data, we may not be able to fulfill the requested purpose of collection, such as to respond to your queries or provide our Sites to you. However, unless otherwise specified, not providing your personal data will not result in legal consequences for you.

Additional data privacy rights: Below please find information on additional rights you may have under applicable law:

· **Access:** You may request that we confirm whether we are processing your personal data. If we are, you may request a copy of your personal data, which we will provide free of charge,

together with information about the such processing, such as the purposes of the processing and the categories of personal data concerned. However, this is not an absolute right and the interests of other individuals may restrict your right of access. For further copies, we may charge a reasonable fee based on administrative costs. We may decline requests which are excessive, particularly if repetitive.

- **Rectification:** You may also ask us to change, update or fix your personal data in certain cases, particularly if it's inaccurate.

- **Erasure:** You may request the erasure of your personal data via our email address: privacy@kingdomcause.community

- **Restrict Processing:** You may ask us to restrict the processing of your personal data under certain circumstances, such as if your Personal Data is inaccurate or unlawfully held.

- **Data portability:** You may ask for a copy of the personal data you provided to us in a structured, commonly used and machine-readable format and you may have the right to transmit this data to another entity.

- **Object:** You may object to the processing of your personal data on grounds relating to your particular situation under certain circumstances, for example for direct marketing. If you have a right to object and you exercise this right, your personal data will no longer be processed for such purposes by us, unless there are overriding compelling legitimate grounds for the processing or as otherwise provided under applicable law .

Please note that these rights may be limited under applicable laws. To exercise your data subject rights under EU General Data Protection Regulation, please submit your request to privacy@kingdomcause.community. So that we can better process your request, please provide the email you used to make requests or to use other services through our Sites.

Please note that we may need to retain certain information for recordkeeping purposes, to complete any transactions that you began prior to your request, or for other purposes as required or permitted by applicable law.

INTERNATIONAL TRANSFERS

Personal data may be transferred to and processed by recipients that are located inside or outside the European Economic Area ("**EEA**"). For recipients located outside of the EEA, some are certified under the EU-U.S. Privacy Shield and others are located in countries with adequacy decisions (click

https://ec.europa.eu/info/law/lawtopic/data-protection/data-transfers-outside-eu/adequacy-protection-personaldata-non-eu-countries_en#dataprotectionincountriesoutsidetheeu),

and, in each case, the transfer is thereby recognized as providing an adequate level of data protection from a European data protection law perspective. Other recipients might be located in countries which do not provide an adequate level of protection from a European data protection law perspective and for which we will base the transfer on appropriate

safeguards, such as standard data protection clauses adopted by the European Commission or by a supervisory authority, approved codes of conduct together with binding and enforceable commitments of the recipient, or approved certification mechanisms together with binding and enforceable commitments of the recipient. You may request a copy of such appropriate safeguards by contacting us as set out in Section XI of the Privacy Policy.

Last Updated: May 23, 2018