

Open Door Centre Policy 08	Privacy Notice

### 1 Background

1.1 The John Trotter Trust is the Registered Charity for the Open Door Centre [Charity Registration No: 1141414]. The Centre is at the heart of the community outreach of Christ Church Barnet [CCB]. Where relevant, the Trust's policies reflect those of CCB.

# 2 The purpose of the Privacy Notice

- 2.1 This privacy notice explains what to expect when the John Trotter Trust collects and uses your personal information. The UK data protection regime is set out in the Data Protection Act 2018 (amended January 2021) along with the UK General Data Protection Regulation, January 2021 (GDPR). Please read it carefully.
- 2.2 The Privacy Notice is provided by the John Trotter Trust which is the data controller for your data.

# 3 Applicability of the Privacy Notice

3.1 This Privacy Notice applies to trustees and volunteers (including employees when acting in a volunteering capacity). It also applies, as appropriate, to customers, users and supporters of the Centre.

#### 4 Personal data

- 4.1 "Personal data" is any information about a living individual which allows them (the data subject) to be identified from that data (for example a name, photographs, videos, email address, or address). Identification can be by the information alone or in conjunction with any other information. If you are involved in, and/or support, the activities of the Open Door Centre then that probably includes you. GDPR gives you more control than previous legislation over the personal information that the John Trotter Trust holds about you. GDPR recognises some information as 'sensitive personal data'. This includes information which reveals your religious beliefs, health issues, race or ethnic origin. The John Trotter Trust will always treat any sensitive personal data with extra care, in accordance with GDPR.
- 4.2 The John Trotter Trust complies with its obligations under GDPR by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure; and by ensuring that appropriate measures are in place to protect personal data.

## 5 What data do the data controllers process?

- 5.1 The Trust will process some or all of the following where necessary to perform its tasks:
  - i. Names, titles, and aliases, photographs:
  - ii. Contact details such as telephone numbers, addresses, and email addresses;

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- iii. Where you make donations to the Charity; when you fundraise for the Open Door either directly or through Mydonate or other social platforms for giving; or when you pay for activities such as use of the rooms in the Open Door Centre, financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers;
- iv. The only data we would hold which is likely to constitute sensitive personal data is that which you may provide to us (for example you may give us information when corresponding with us by email, telephone or letter)

## 6 How personal data is used by John Trotter Trustees

- 6.1 We use your personal data for the following purposes:
  - i/. To enable us to provide a voluntary service for the benefit of the community in our parish and the surrounding area.
  - ii/. To administer customer records as appropriate including those hiring rooms in the Centre.
  - iii/. To fundraise and promote the interests of the Open Door Centre.
  - iv/. To manage our volunteers.
  - v/. To maintain our own accounts and records (including the processing of gift aid applications).
  - vi/. To inform you of news, events and activities running at the Open Door Centre through publications, invitations e-news and other communications.
  - vii/. To enable us to keep those taking part in events safe by sharing information about dietary restrictions or health concerns as appropriate. viii/. To enable us to ensure that photographs of individuals are only used with their permission.
  - ix/. Contacting you, your next of kin, or other relevant contact in case of an emergency.
  - x/. Communications to you may be sent by post, telephone or email address. xi/. Your personal mobile phone number which is used by the accessing of the Software Communication Account (Sling) providing you have given consent. (This applies to relevant staff and volunteers only).

## 7. The basis for processing your personal data.

7.1 We need to have a lawful basis for processing personal data. The following are the lawful bases that apply when the JTT processes your data:

i/ In some cases we ask for your explicit consent so that we can keep you informed about news, events and activities; so that we can process your gift aid donations; so that we can ensure your safety at events; so that we can respect your wishes about how photographs are used in our publicity.

li/ Some processing is necessary for carrying out our legal obligations under employment, social security or social protection law, or a collective agreement as appropriate.

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lii/. Some processing may be carried out in the course of our legitimate activities without explicit consent, which is permissible because we are a not-for-profit body with a religious aim. This includes, for example, contact details held by members of the Management Sub-Committee or Trustees for the purpose of keeping volunteers informed about activities of the Centre. We will only do this if: the processing relates only to volunteers or former volunteers of the Open Door Centre (or those who have regular contact with the Centre in connection with those purposes).

iv. We do not disclose any of your information to a third party without your consent.

# 8 Sharing personal data

8.1 Your personal data will be treated as strictly confidential and will only be shared with other individuals involved in running/supporting the Open Door Centre for purposes connected with the Centre. We will never share your information with third parties unless either this is explained to you at the time we collect your information and you give us your permission to, or we are legally required to do so. For example, we are legally required to provide your data to HMRC if you have agreed to us claiming Gift Aid on your donations.

## 9 How long is personal data kept?

9.1 The Trust will keep some records permanently if we are legally required to do so. We may keep some other records for an extended period of time. For example, it is current best practice to keep financial records for a minimum period of seven years to support HMRC audits. In general, we will endeavour to keep data only for as long as we need it. This means that we may delete it when it is no longer needed.

# 10 Your rights and your personal data

- 10.1 You have a number of rights with respect to your personal data. These apply generally, but there are some exceptions, for example to requesting erasure when we have an overriding legal obligation to keep your data.
  - i/. The right to request a copy of your personal data which the Trust holds about you.
  - li/. The right to request that the Trust corrects any personal data if it is found to be inaccurate or out of date.
  - lii/. The right to request your personal data is erased where it is no longer necessary for the Trust to retain such data.
  - lv/. The right to withdraw your consent to the processing of your data at any time.
  - v/. The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing.
  - vi/. The right to object to the processing of personal data.

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Vii/. The right to lodge a complaint with the Information Commissioner's Office.

# 11 Further processing

11.1 If we wish to use your personal data for a new purpose, not covered by this Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

### 12 Further Information

- 12.1 If you would like to know more about this privacy policy, or if you would like to exercise any of your rights as described above, then you can:
  - i/. Talk to one of the trustees.
  - ii/. Write to us at: Open Door Centre, St Albans Road, Barnet, EN5 4LA
  - iii/. Contact the Chair of Trustees, Andy Wright: Andy.Wright@barnetopendoor.com
  - iv/. For more details on the GDPR and for questions about how organisations may use your personal data, you can contact the Information Commissioners Office on 0303 123 1113 or via email <a href="https://ico.org.uk/global/contact-us/email/">https://ico.org.uk/global/contact-us/email/</a> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Signed	Date

### Andy Wright: Chairman of the John Trotter Trust

This Privacy Notice was reviewed by the Trustees of the John Trotter Trust at their meeting on 18 <sup>th</sup> January 2023		
Date of next review of this policy	January 2024	
Queries about this policy should be directed to	Chair of Trustees	