## PRIVACY NOTICE

Here at Causeway Coast Vineyard (CCV) we take your privacy seriously. We are committed to protecting your personal information and being transparent about what information we hold about you, whether you are a visitor to our websites, a subscriber to our newsletters, a purchaser of our resources, a financial supporter, a volunteer or participant in one of our programmes or events, or a prayer supporter.

This policy explains how we collect and use the personal information you provide to us, whether this is online, in person or via phone, mobile, email, letter or other correspondence or printed form, and personal information about you that we may obtain from third parties.

If you use our websites or any of our services, or provide us with any personal information, we will bring this policy to your attention so that you are fully aware of how your information will be used and disclosed.

# **Our Privacy Policy in Brief**

It's important that you read the full policy to understand what information we hold, how we may use it, and what your rights are - but if you don't have time to read it all now, here's a quick summary:

- We collect information that is personal data. Personal data is information that can be used to help identify an individual, such as name, address, phone number, email address, IP addresses or website pages accessed.
- We collect information about most people who engage with us at CCV. (It is possible to remain anonymous by just browsing our website or by coming to church and not signing up to participate in any events.) This could be church attenders, newsletter subscribers, those who participate in our events, donors, volunteers, employees or trustees.
- We collect information to ensure the smooth running of the church and the associated activities and events which we run, to fundraise for our work, to resource our activities and fulfil our charitable objectives and for administration. This information may also be used for analysis and for the prevention or detection of crime.
- We only collect the information that we need or that you agree we can collect.
- We do our best to keep personal information secure wherever we collect personal data online
- We never sell your data and we will never share it with another company or charity for their own purposes.
- We only share data where we are required by law or with carefully selected service providers
  who carry out work for us. We recognise the importance of ensuring that all our service
  providers treat your data as carefully as we would, use it only as instructed, and allow us to
  check that they do this.
- Our websites use cookies. For more information, please read the cookies section below.

These are the key points of the privacy policy. You will find the policy in full below, so you've got all the details you need.

This policy applies to all the websites we operate, our use of emails and postal mailings and any other methods we use for collecting information. It covers what we collect and why, what we do with the information, what we won't do with the information, and what rights you have.

#### Who are we?

CCV is a Northern Ireland church and charity that is passionate about making a difference through the Christian faith by transforming lives and communities.

CCV's Northern Ireland charity registration number is 101605. We are also registered as a company in Northern Ireland under registration number NI068677.

CCV is registered with the Information Commissioner's Office (ICO) as a data controller, registration number Z783942X

CCV's registered address is 10 Hillmans Way, Ballycastle Road, Coleraine, County Londonderry, BT52 2ED.

For further information about our privacy policy and data protection, please contact us by:

- emailing dataprotection@causewaycoastvineyard.com
- writing to our Data Protection team at CCV's registered address
- calling us on 028 70326161 and asking for the Data Protection Officer.

#### What Information do we collect? Where do we collect it from?

We will only ever collect the information we need - including data to help improve our services - or which you agree we can collect.

Personal data is any information that can be used to identify you. For example, it can include information such as your name, email address, postal address, telephone number, mobile telephone number, bank account details, credit/debit card details, and whether you are a taxpayer so that we can claim Gift Aid on any donations you may make. It also includes Internet Protocol (IP) addresses (the location of the computer on the internet), details of pages visited on our websites and files downloaded.

We collect information in the following ways:

## Information that you give us directly

We collect this information in connection with specific activities, for example, when you use our websites or printed forms or telephone our offices to:

- make a donation to us
- purchase a resource
- register for an event or small group
- · engage with our social media
- sign up for our email newsletters
- complete a survey, questionnaire or feedback form
- or otherwise provide us with personal information.
- in the interests of security and safety, and the comfort of the Church community, the Church also operates video cameras within and around some Church premises.

• If you are a CCV employee or volunteer we may also hold certain categories of sensitive information such as personal financial details, age, gender, marital status, date of birth, full employment and educational history, references, medical and criminal records.

**Please note**: You don't have to disclose any of this information to browse our websites. However, if you choose to withhold requested information, we may not be able to provide you with certain services.

## Information that we collect from your use of our websites

Website usage information is collected using cookies. This helps us to see how many people use our websites, how many people visit on a regular basis, and how popular individual pages are. Cookies are also essential to our websites running correctly and delivering goods and services to users. For more information, please see the cookies section below.

## Information from third parties

We may receive information about you from third parties, for example Access NI.

## Sensitive/special categories of data

Data Protection law recognises that certain categories of personal information are more sensitive. This is known as sensitive personal data or special categories of data and covers health information, race and ethnicity, religious or philosophical beliefs and political opinions amongst other things.

We do not collect sensitive personal information about you unless there is a clear reason for doing so, such as involvement in an event where we need this information to ensure safeguarding, to carry out appropriate checks on volunteers, or care for participants. For some events we will collect health information so that leaders on our events have the relevant information to care for participants.

When we collect this information, we will make it clear to you what we are collecting and why and what are our legitimate interests or other legal grounds for processing this information.

# **Primary School Children**

If you attend primary school or are younger and would like to participate in an event, make a donation or get involved with us, we will need your parent or guardian's permission before giving us your personal information.

When we collect information about a child or young person, we will make it clear why we are collecting this information and how it will be used.

In most cases, children in secondary school upwards may give their own consent in relation to any data collection applicable to them.

### How do we use personal data?

We may use the personal data that you provide in the following ways:

- to process and contact you in relation to your participation in CCV's regular activities
- to process any donation(s) we may receive from you, to claim Gift Aid on these donations and to update you on how your donations are being used
- to process event bookings
- to set up direct debits, standing orders and one-off card payments

- to provide you with information that you have requested about our work or our activities
- to provide you with information about other resources, events or programmes we offer that are similar to those you have already purchased or enquired about and to which you have not objected to receiving
- to communicate with supporters
- · to record the contact that we have with you
- for administration purposes, e.g. we may contact you about a donation you have made or event you have expressed an interest in or registered for
- for internal record keeping, such as the management of feedback or complaints
- to notify you about changes to our services
- to analyse and improve the services we offer
- to analyse the use of our websites and ensure their content is presented in the most effective manner for you and your device (see the cookies section below)
- to further our legitimate charitable aims
- to maintain accurate and up to date records or our employees & volunteers.
- to run Access NI checks on employees & volunteers in accordance with our safeguarding and employment policies

#### Where Do We Store Your Personal Data?

We maintain a high level of security in relation to the collection, storage and disclosure of your information. This is very important to us and we take all necessary steps to ensure that any information we hold about you is safe.

We place great importance on the security of all personal data associated with our regular attenders, supporters, volunteers and staff.

Information is stored by CCV in secure cloud storage. We may also store information in paper files in secure locked cabinets in our offices.

We have security measures in place to attempt to protect against the loss, misuse and alteration of personal data under our control. For example, only authorised personnel are able to access personal information, we ensure access to information is password protected or secured via locked filing cabinets.

While we cannot ensure or guarantee that loss, misuse or alteration of data will not occur while it is under our control, we use our best efforts to try to prevent this.

Any sensitive or special categories of data you may provide to us are only shared on an absolute need to know basis, and are deleted after each relevant event unless we need to keep that information for a longer period e.g. for safeguarding reasons.

We enforce strict procedures and security features to protect your information and prevent unauthorised access, although we cannot completely guarantee the security of any information you transmit to us.

Where you or we have provided a password enabling you to access parts of our websites or use our services, it is your responsibility to keep this password confidential. Please don't share your password with anyone. If you think anyone else has gained access to your password, please let us know as soon as possible.

# Transferring your information outside of Europe

Although most of the information we store and process stays within the UK, some information may be transferred to countries outside the European Economic Area (EEA).

This may occur if, for example, one of our supplier's servers on which personal information is stored is located in a country outside the EU or if we use a cloud IT platform where data is dispersed between a number of different servers. These countries may not have similar data protection laws to the UK. However, we will ensure that your privacy continues to be protected as outlined in this privacy policy and in accordance with our legal obligations under applicable data protection legislation.

By submitting your personal information to us you agree to this transfer, storing or processing at a location outside the EEA.

## What Is Our Legal Basis For Processing Your Data?

Our legal basis for processing personal data is different depending upon the purpose it was collected for. The following list covers the main types of data that we hold, for a full list please contact dataprotection@causewaycoastvineyard.com

- Data collected for CCV newsletters and marketing lists is held on consent (unless otherwise stated). We will also ensure you have a right to unsubscribe from these.
- Data collected through our booking systems for the events and courses that we run is held on consent, for our legitimate interests or because of a contractual obligation to do so.
- Employee & volunteer data records are processed to comply with legal and contractual obligations and to fulfil our legitimate interests as an employer.
- Regular church attender's data is primarily held by consent but there may be occasions where we will rely on legitimate interest for the daily operations of the church.
- We use compliance with a legal obligation as the basis for processing any legally required activities such as Gift Aid returns to HMRC.

#### How Long Do We Keep Your Data For?

- We will hold your personal information on our systems for as long as is needed to fulfil the function for which we hold the data or as long as is required by law for the relevant activity. For example, HMRC requires us to keep a record of donations, Gift Aid and financial transactions for seven years.
- If you request that we stop sending you marketing or fundraising information, we will keep a record
  of your contact details and appropriate information to enable us to comply with your request not to
  be contacted by us.
- Legacy income is vital to the running of the charity. We may keep data you provide to us until 24
  months after a legacy gift is received, or until we are notified that CCV is not a beneficiary from the
  estate, to carry out legacy administration and communicate effectively with the families of people
  leaving us legacies. This also enables us to identify and analyse the source of legacy income we
  receive.
- Where your information is no longer required we will ensure that it is disposed of in a secure manner.
- Information will only be kept as long as is necessary for the purposes for which you provided it or
  we obtained it and will be minimised to ensure we only keep what is necessary.
- For a full list of our data retention periods you can contact dataprotection@causewaycoastyineyard.com

We'd like to keep all who engage with CCV up to date with our activities and events.

We will not use your information for marketing or fundraising purposes if you have asked us not to or we do not have your permission to use it for these purposes. (In certain circumstances we must obtain your permission before we contact you for marketing or fundraising purposes.) However, we will retain your basic details on a suppression list to help ensure that we do not continue to contact you.

If you are registered to receive one of our email newsletters, every email communication provides a clear opportunity for you to opt out of/unsubscribe from future email communications.

The General Data Protection Regulations give you certain rights over your data and how we use it. You have the right to:

- request a copy of the information we hold about you and details of what we do with that information (known as a subject access request)
- update or amend the information we hold about you if it is wrong
- change your communication preferences at any time
- withdraw your consent to use of your personal information where we are relying on consent as the legal ground for processing it
- ask us to remove your personal information from our records
- ask us to restrict the processing of your personal information
- obtain a portable copy of certain personal information where this is processed automatically
- object to the processing of your information for marketing purposes
- raise a concern or complaint about the way in which your information is being used
- ask us to explain any automated processing we carry out and the impact of this on you

  If you wish to exercise any of these rights, please contact our Data Protection team in writing at 10

  Hillmans Way, Ballycastle Road, Coleraine, County Londonderry, BT52 2ED or by

  emailing dataprotection@causewaycoastvineyard.com.

If we are not sure who you are, we may ask for reasonable proof of your identity before providing you with information or carrying out any of the above actions.

### **Cookies**

#### What are cookies?

Cookies are small text files that are automatically placed onto your device when you visit a website.

They are widely used to enhance the user experience, optimise the performance of websites, save options chosen by visitors, provide website owners with information about how their websites are being used and offer goods and services to users.

This allows website operators to identify areas for improvement, offer personalised and secure services and develop our websites effectively.

## Do I have to agree to cookies?

Most web browsers accept cookies automatically. However, you do not have to accept most cookies deployed to your device.

If you wish to control the cookies that are placed on your device, you should be able to customise the settings of your web browser (Chrome, Safari, Internet Explorer, Firefox, etc.) and adjust your cookie settings yourself. If you can't do so, you may wish to consider changing your web browser.

If you need help adjusting your cookie settings in your web browser, please check the information that came with your browser software, contact the company who supplied the software or visit www.aboutcookies.org or www.allaboutcookies.org.

Please note that if you disable some or all of the cookies, you may find that our websites don't function correctly.

It is not possible to disable cookies or other similar technology that are strictly necessary to operate our websites such as load-balancing cookies or those that enable us offer goods or services to you or offer secure log-in or sign-up options.

## Acceptance of our cookies policy

If you do not change your browser settings and you continue to use our websites, we will conclude that you have consented to us using cookies as detailed in this policy.

If you select any option we offer for us to store your cookie preferences for our websites, we will use a cookie on your device to remember this for future visits.

Our websites use cookies for the following reasons:

- To allow you to carry information across pages of our websites and avoid having to re-enter information when you return to one of our sites;
- To measure our website traffic and analyse how our websites work. This will allow us to make changes to our websites in the future and make them easier to use;

## **Changes To Our Privacy Policy**

Any changes we make to our privacy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

## Contact

If you have any questions, comments or requests regarding this privacy policy please dataprotection@causewaycoastvineyard.com or write to us at:

Data Protection Officer
Causeway Coast Vineyard
10 Hillmans Way
Ballycastle Road
Coleraine
Co. Londonderry
BT52 2ED