

Enfield Vineyard Data Protection & Privacy Policy

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Data Privacy Summary

By simply reading this document you are not providing consent - please provide your consent via one of our consent forms (ask a member of staff if you don't have one).

1. We collect different kinds of personal data on three groups of people:

- (a) Our core (including Church meeting/gathering attendees, volunteers, company directors and trustees, paid and unpaid staff and donors)
- (b) Our outreach ministries (including volunteers, clients, staff, guardians and sponsored orphans)
- (c) Other (including business contacts)

2. We use this data for a number of reasons:

- (a) to know who we have in our church
- (b) to support you with pastoral support
- (c) to support our outreach ministries
- (d) to run our day-to-day business, as we are both a registered company (no. CE023487) and a charity (no. Charity No 1191391)

3. We don't store and use your data longer than necessary, which varies by document, form or type of data

4. We may share your data for a number of reasons:

- To perform processing on our behalf (e.g. ChurchSuite)
- For legal reasons or official public interests (e.g. DBS forms)
- For safeguarding and safety reasons

5. You have a number of rights regarding your personal data:

- (a) to be updated on how we process your data
- (b) to request us to update, erase or provide access to your data
- (c) to object to us either processing your data or contacting you directly

6. Your consent is optional, and you can withdraw it at any time

- If you are under age 16, consent must be given from your legal guardian
- If you are aged 16 or over, you must consent for yourself

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Document Revision History

The below table describes historical changes to this document:

Date	Author	Description of change
16 April, 2020	Paul Twelftree	● Initial draft
29 April, 2020	Susanna Blustin	● Review
29 April, 2020	Wendy Banks	● Edits
5 May, 2020	Ben Collins	● Review
1 June, 2022	Deborah Cullingford	✎ Edits
20 March 2023	Trust Board	✎ Reviewed and approved

Definitions

The below table describes some key terms used throughout this Policy, to avoid confusion. Many terms are discussed and explained in further detail within the Policy.

Term	Description
data	A fact or figure; examples vary from numbers to a person's signature
information	When one or more pieces of data are processed (see below) to create something more meaningful than a plain fact or figure
data privacy	Data privacy generally refers to who can access to a piece of data
data protection	Data protection generally refers to how the access to a piece of data is restricted
data processing	Any action on data can be considered processing; e.g. obtaining, creating, storing, reading, copying, changing, moving, destroying
data subject / individual	A data subject or individual is the legal term for a person who the data in question relates to
personal data	Types of data which can identify an individual, either directly (e.g. name) or indirectly (e.g. email)
sensitive personal data	A subset of personal data which is treated somewhat differently by law. E.g. biometric, religious beliefs and health data
data controller	An organisation (not a person) that controls and is responsible for what, why and how personal data is processed for that organisation
data processor	An organisation that is instructed to process data by a data controller

The legal stuff

Who are we?

Enfield Vineyard ("EV") is a Christian church affiliated to [Vineyard Churches UK](#)

We are a registered charity in England and Wales (number Charity No 1191391)

You can contact us via email at info@enfieldvineyardchurch.com or post. Our addresses are:

- *Church office: 36 Brigadier Hill, EN2 0NQ*
- *Registered address: 32-36 Brigadier Hill, EN2 0NQ*

Accountability for Enfield Vineyard's compliance with this privacy policy rests with the Chair of Trustees. The Chair of Trustees may delegate an individual to act on his or her behalf. All Enfield Vineyard employees are responsible for their own compliance with this policy.

Scope of this Policy

This privacy policy applies to all personal data processed by full-time and part-time employees, contractors, volunteers and partners doing business on behalf of Enfield Vineyard, as well as all legal entities, all operating locations in all countries and all church processes conducted by Enfield Vineyard that are subject to comply with the contents of the policy.

The national and local laws of every country and legal jurisdiction in which personal data is collected and processed apply. Any mandatory registration provisions that may exist according to legal requirements must be observed. Every legally independent entity within Enfield Vineyard is responsible for assessing whether and to what extent such registration obligations exist toward national and/or regulatory authorities. In case of uncertainty, stakeholders must consult the ICO and/or general counsel.

Collection of personal data by — and the disclosure to — governmental institutions and authorities will be carried out only on the basis of specific legal provisions. In all cases, this privacy policy imposes those restrictions that are necessary to meet the legal requirements of the respective laws.

Disclaimer

We have tried to ensure that all information provided through this Policy document is correct at the time it was included and apologies for any errors - though do let us know.

Please note that whilst we hope you'll find any links we provide useful, we cannot be responsible for the content of external websites.

Introduction

What is the **purpose** of this document?

This Policy document describes the personal data and information we process at Enfield Vineyard (the “controller”). It does not cover non-personal data in detail.

This Policy applies to all subsidiaries, business units and personal data-processing activities under the responsibility of Enfield Vineyard.

In the *General Data Protection Regulation* (GDPR), an EU law brought in during May 2018 to replace the *Data Protection Act 1998*, a number of changes to the law were made. The Information Commissioner’s Office (ICO) govern this law in the U.K.

This Policy refers heavily to the GDPR throughout, as the basis of legal rights for both EV and its people.

What is **personal data**?

The ICO states that personal data relates to a living individual who can be identified either:

- A. directly from the data or,
- B. from the data in combination with other data that may come into the controller’s possession

Certain types of personal data given further special laws due to their sensitive natures are called “sensitive personal data”.

The following table may help to illustrate what is, and what is not, personal and sensitive information:

Not personal data	Personal data	Sensitive personal data
Address without a name	Name and address	Racial or ethnic origin
Generic or company email addresses hello@enfieldvineyard.com	Personal email address	Political, religious or sexual opinions and beliefs
Receipts with only 4 digits of a card number showing	Signatures	Physical or mental health
Financial accounts with summarised payroll data	Pay records with gender and age, even without a name	Biometric information
Company name and website	Web cookies	Offence records

How do we process your personal data?

Processing means a wide range of different things for personal data. Our major data processing activities include create, store, use, share, archive and destroy.

The following sections cover who are people are and each of these data processing activities, and what you need to know for each.

Who do we collect personal data on?

We collect and process data on a wide range of people, both within our core church and also within and linked to our outreach ministries. For the purposes of data privacy, we group our people into three categories (*please note that this list may not be exhaustive*) :

- **EV Core**
 - Company Directors and Trustees
 - Paid staff
 - Volunteers, including unpaid leadership team
 - Sunday attendees
 - Donors
- **EV Outreach Ministries**
 - Outreach volunteers
 - Outreach clients (including Growbaby, CAP and EV Gym)
- **Other**
 - Business contacts and loan recipients

We may also process data on people who are no longer members of the above groups, for example past volunteers who have since stopped.

Why do we process your personal data?

EV processes your personal data for one of several reasons. The table below illustrates why we process different people's data for different reasons.

In some cases, we process multiple parts of an individual's personal data due to different reasons for processing.

If you're interested in finding out more about why we process your specific personal data, please get in touch with EV.

Reason for processing	Notes from EV
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By consent	Consent must be provided from the individual in question. Note that consent can also be withdrawn. Please see the later section “How can you consent?” for more details.
Due to a contract	We generally hold contracts with businesses partners and our staff and process their data in alignment with those contracts.
Out of legal obligation / an official public interest	Rarely, we may be asked to provide data for legal reasons, such as providing information to the police.
To protect an individual's health (vital interests)	Rarely, we may use personal data to protect an individual's health, such as providing it to healthcare services (physical health), or for child safeguarding reasons to the local council (mental or physical health).
Legitimate interests	Generally applies to data processing where withdrawal of consent would prevent EV fulfilling or providing a service to the individual.

How do we collect your personal data?

Depending on which of our people categories you belong to, we collect different kinds of information from or about you. Broadly, there are three categories:

- 1. Information you provide** - We collect a range of personal data from you, from basic data (e.g. name, email, phone number) to more comprehensive data (e.g. attendance at events). You may enter your personal data into a printed form or electronically or give it to us verbally.
- 2. Information provided to us** - Occasionally, personal data is provided to us by other data controllers, including the government (for example for DBS checks) or from local authorities (for example for safeguarding issues).
- 3. Device information** - When you use your device for our electronic media, like when visiting our website or logging into our ChurchSuite platform, we may capture details about your device, for example your IP address or cookies. Cookies are small pieces of information that we generate and store on your computer's web browser to allow us to track visits to our website, to better understand how our website is used and therefore improve it.

To request a full list of data we may hold on you, or to find out more about web browser cookies, please contact us.

Where do we store your personal data?

As with any business, we hold your data in a number of locations, including paper form and electronically.

The main locations your data is held are listed below:

- Devices (e.g. Computers, tablets and phones)
- Portable media (e.g. USB memory stick, CD, DVD)
- Platforms (e.g. ChurchSuite for contact details, accounting software for expenses, Mailchimp for communications, Microsoft Office 365, Dropbox or Google Suite for shared files)
- Web hosts and email accounts
- Web browser cookies
- Filed paper (e.g. forms that you may have signed, or documents we may print and store as hard copies)

Protecting your data

Keeping your personal data safe is crucial to us, so we both explore data protection as an organisation and train our team on data privacy to keep your data as safe as possible. We also consider data security when deciding to use a new platform. A range of different people may have access to different parts of your data, including paid and unpaid team members.

Data breaches

When personal data is exposed unintentionally to a person outside of our organisation, it is classed that as a data breach. Whilst it is highly unlikely to occur to your data at EV, if a data breach does occur, we will inform you in due course to what happened and our actions to prevent any further problems.

How do we **process** your personal data?

As discussed above, data processing is any action that can be “done” to personal data, from creation, storage and use through to archiving old data and destroying data.

There are a wide number of uses for us to process your personal data, many of which are explained when the data was collected. The below list shows a number of examples of how we may process your personal data:

- Collecting and storing your personal data (for example entering written data into an electronic format)
- Using your contact details to speak to you
- Using your personal data to support pastoral care (for example, if you are a newcomer or stop attending Sunday services)
- Matching bank statements to your account number to understand how you give
- Plotting Sunday attendees’ addresses on a map to understand how people travel to church
- Storing bank account details to reimburse expenses
- If requested by the government, showing completed consent forms to show your consent to us processing your data
- Sending emails to you, including one-off emails and regular newsletters
- Including photographs on the website

Who do we share your personal data with?

As shown above, we primarily share your personal data with our platforms, who perform data processing on our behalf. The below list shows our main platforms and their functions, but this may change from time to time, for example in the future to collect online payments via our website:

- ChurchSuite (for contact details, teams, connect groups and events)
- Planning Centre Online (for planning worship)
- Google Drive (to store documents and files)
- Microsoft Office 365
- Stripe (for invoicing and payments)
- Zettle (to collect contactless card payments)
- Mailchimp (for newsletters and communications)
- —

We may also share your personal data to support official government requests for information, for legal reasons, or for safeguarding issues.

Please note that each platform has its own privacy policy - please get in touch for more information.

How long do we process your personal data for?

Under the GDPR, EV has a responsibility to not hold data for longer than necessary. At the end of its lifespan and useful duration, we destroy the data in question (see “How do we destroy personal data?”).

Different types of documents and data require different durations, for example financial accounts may be kept for a minimum of 7 years, or a volunteer’s contact details may be kept for 2 years after they have left the outreach ministry.

To enquire on the duration a specific type of document or data is kept, please contact EV.

How do we **destroy** your personal data?

We erase and destroy data from time to time; an example could be a staff member from 10 years ago, who we no longer need the information on. We do not inform the individual that their data has been destroyed.

For digital documents, we permanently delete these from whichever storage location they currently sit.

For paper documents, we either incinerate or shred and securely dispose of these documents.

What are your legal rights?

The GDPR outlines a number of legal rights for all data subjects, you have the following rights to:

Your right to	Legal Right
Be informed	... be informed about how EV processes your personal data
Request Access	... request access to your personal data in a portable, readable format (e.g. CSV)
Update your personal data	... update the personal data EV hold on you
Request erasure	... request erasure of your personal data that we hold
Request restriction	... request that we restrict processing of your personal data
Object to processing	... object to processing of your personal data
Object to direct marketing	... object to direct marketing
Automated decision making	... inform you of, and allow you to request human involvement of any automated decision making and profiling (where there is no human involvement in data processing)

How can you consent?

We collect consent via written form (for example, your name, date and a signature) or via an electronic form (for example, a tick box or submit button).

If you're reading this document, it is likely you have been given a form to complete. However, if you don't have a form but wish to consent, please contact us via info@enfieldvineyardchurch.com.

At a minimum, to consent we will require your full name.

How should individual requests be made?

You are able to make a number of different requests at any time, as discussed in the previous section.

Please note that we log all requests, even after deletion of your personal data.

Request type	Notes from EV
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Accessing your personal data	<ul style="list-style-type: none"> • Specific access requests are preferred (e.g. a particular part of your personal data, or your personal data on a particular document) • We are also able to provide all of the personal data we hold on you in a portable format. This may include .CSV files and scanned paper documents in a folder repository, provided to you via a .ZIP file.
Erasing your personal data	<ul style="list-style-type: none"> • Before destroying any of your personal data, we will walk through the implications of such actions, such as not being able to provide the same services anymore. • Specific erasure requests are preferred (e.g. a particular part of your personal data, or your personal data on a particular document) • We are also able to erase all of the personal data we hold on you.
Update your personal data	<ul style="list-style-type: none"> • We can update your electronic personal data if it is provided to us via email or in writing. • Unfortunately, we cannot amend paper-based documents.
Restrict processing of your personal data	<ul style="list-style-type: none"> • As many of our systems and processes are integrated together, we may not be able to restrict processing on a particular part of your personal data. • However, we will fully attempt to do so, after discussing with you the implications of such an action.

Please contact us with your requests in as much detail as possible, as discussed in the previous section via email or in written form, with details of how to best contact you.

Note that EV have up to 30 days to respond to your request.

Note that EV do not legally have to grant requests to erasure or restricting should processing be carried out for any reason other than consent (as covered in this Policy).

You can read more on requesting information, along with a wide range of other information on data privacy legislation on the Information Commissioner's Office (ICO) website by visiting <https://ico.org.uk>.

Complaints

We encourage anyone interested to raise any concerns via info@enfieldvineyardchurch.com and we will investigate and attempt to resolve any complaints and disputes.

How will I be informed of updates to this Policy?

As laws and legislations change from time to time, we may wish to inform you of updates to this Policy. A summary of these updates will be sent to all consenting individuals via email where possible, or at any time you can visit [here](#) to view the latest version of this Policy.

Employees handbook for Data Privacy

Responsibilities

Enfield Vineyard's Data Protection & Privacy Policy applies in full to all employees, as does their right to requests. Protecting employee and customer privacy is a responsibility of every individual employee of Enfield Vineyard, including all its subsidiaries.

Every church process in which personal data is processed falls under the delegated responsibility of the relevant mandated church process owner.

Permissibility of Data Processing

Processing of personal data is permitted only if the individual has consented to it or if legal permissibility follows from applicable law.

The consent shall be declared either in writing via a consent form or with other legally permissible means (such as electronic consent form), whereby the individual has to be informed in advance about the purpose of such processing of personal data. The declaration of consent has to be highlighted when included as part of other statements so as to be clear to the individual.

Purposeful use

Personal data may be collected only for specific, explicit and legitimate purposes and may not be further processed contrary to such intended purpose. Business process owners (in consultation where necessary with the Enfield Vineyard legal counsel and the chief privacy officer) define and document processing purposes. Changes of purpose are permissible only with the consent of the individual or if permitted by law.

Based on the defined and documented purposes, business process owners motivate the personal data records/items necessarily processed to serve those purposes.

Privacy by design

It is Enfield Vineyard's explicit goal to implement any new application or service with "privacy by design" considered. One of the best ways to protect an individual's privacy is to not collect their personal data in the first place. Processing of personal data that Enfield Vineyard possesses must be truly necessary for the intended purpose.

Enfield Vineyard further minimizes the risk of data exposure by reducing the sensitivity of stored information, wherever possible:

- One approach is to restrict access to large amounts of personal data. For example, employees who have a need to access individual records of personal data do not automatically have access to batches of personal data.

Reduce data retention

The longer that personal data is retained, the higher the likelihood is of accidental disclosure, loss, theft and/or information growing stale. In other words, time is a critical success factor for a data breach. At Enfield

Vineyard, personal data is retained only for the minimum amount of time necessary to support the church purpose or to meet legal requirements.

Any personal data kept by Enfield Vineyard is managed under a retention policy that states how long the data is being kept and why, and the manner in which it will be removed from all data stores. An expiry date is set, and that expiry date is stored together with that personal data. Retention expiration triggers should be connected to a specific phase — for example, when collecting the personal data.

Sensitive information and special categories

Special categories of personal data include information revealing racial origin, political opinions, religious or philosophical beliefs, trade union membership, and data concerning health or sex life. Such information by definition is sensitive, and barring legal instructions, Enfield Vineyard will not process this information. One exception to the matter is religious beliefs, which may be inferred (but not processed) due to Enfield Vineyard being a Christian church organisation.

Taking into account context and attribution, volume and intended usage, other processing activities of personal data at Enfield Vineyard may be considered sensitive as well, following the identified privacy risk. Financial information in the context of Enfield Vineyard's salary administration, for example, requires additional protection and security controls.

Social Media

Employees of Enfield Vineyard participate in social media activities. Enfield Vineyard reserves the right to monitor social media activities to the extent permitted by law, but it will also strive to protect employees' privacy where possible.

Employee mobile devices

Employees of Enfield Vineyard use mobile devices such as smartphones and tablets. Enfield Vineyard will strive to protect personal data where possible and where the use of these devices for personal reasons is permitted.

Data breaches

A data breach is any (potential) unintended loss of control over or loss of personal data within Enfield Vineyard's environment. Preventing a data breach is the responsibility of all Enfield Vineyard's staff and contracted workforce. In addition, everyone is encouraged to notify the Senior Pastors in case of an irregularity in relation to personal data processing activities.

Training, awareness & enforcement

Enfield Vineyard will ensure that the general principles set forth in this privacy policy are observed. In this respect, managerial staff of Enfield Vineyard shall ensure that this policy is implemented, which includes, in particular, providing policy information to employees.

Third party services & subcontracting

Enfield Vineyard may decide to contract a third party for the collection, storage or processing of data, including personal data. The third party may offer services such as hosting, outsourcing of processing, or private or public cloud computing services.

Enfield Vineyard remains responsible and accountable for the personal data processed by the third party, but the subcontractor is contractually obligated to process personal data only within the scope of the contract and the directions issued by Enfield Vineyard. Processing of personal data may not be undertaken for any other purpose.

If Enfield Vineyard decides to contract a third party for the processing of personal data, it should be regulated in a written agreement in which the rights and duties of Enfield Vineyard and of the subcontractor are specified. A subcontractor shall be selected that will guarantee the technological and organizational security measures required in this privacy policy and provide sufficient guarantees with respect to the protection of the personal rights and the exercise of rights related thereto.