



# Supporter Privacy Notice

## The aim of this Privacy Notice

Our supporters are extremely important to us as a College and to our work of furthering God's Kingdom. This Privacy Notice explains how Spurgeon's College collects, stores, manages and protects the data we collect from our supporters. It outlines the types of data that we hold and how we use them to provide services to you. It also outlines what steps you can take if you would like us to change how we use your data or if you would like us to stop using it altogether.

## Our responsibilities and the legal basis for processing your data

Spurgeon's College is committed to protecting your personal data. We aim to be clear how we use your personal information, and not do anything you would not reasonably expect. We are the data controller for all the personal data we hold and process, except where we use data in the capacity of a data processor on behalf of another data controller.

All information you provide to us will be used in accordance with the College's data protection policy (A copy of this policy is available from the Director of Operations). Your personal data will be stored securely in our database which is part of Spurgeon's IT infrastructure and held in accordance with the Data Protection Act 1998.

Spurgeon's college processes the information outlined in this privacy notice for the purposes of:

- Communicating with current and potential supporters about our work
- Providing benefits and services to supporters
- Furthering the College's educational charitable mission (which includes fundraising and securing the support of volunteers)
- Administrative purposes (including processing donations and gift aid)
- Enabling the College to achieve its strategic and operational goals

We may pursue these interests by contacting you by telephone, email, post or social media. Information about how you can manage the ways that we contact you, including how to opt out from some or all contact from us, is outlined in the 'Your rights' section below.

The College relies on your consent as the legal basis for processing, where this is not overridden by the interests and rights or freedoms of the data subjects concerned. We recognise that it is not the only lawful ground for processing data. As such, where appropriate the College will sometimes process your data on an alternative legal basis – for example, to fulfil contractual obligations we may have when you purchase from us.

## **Where do we collect the information from?**

The vast majority of the information we hold is obtained directly from you, for example when you:

- Make a donation to the College
- Visit our website
- Register for an event
- Contact us with an enquiry
- Complete a survey
- Purchase goods or services from us
- Apply for a job with us
- Volunteer with us
- Are a church leader and/or have a key role in a church working in partnership with Spurgeon's
- Otherwise provide us with personal information

We may also collect information from other sources, for example:

- We may use the Royal Mail's postcode finder, National Change of Address update (NCOA®) or the electoral roll, to check the accuracy of the address we hold;
- Information made available publicly by Charity Commission, Companies House, social media, or information that has been published in newspapers and articles.

## **What information do we collect about you?**

The personal information we will collect and process will include your name and contact details including email address and mobile number. The information we collect might also include date of birth, areas of interest and potential interest, and details about propensity to volunteer and/or to support the College financially through charitable donations. If you make a donation to the College, or pledge a donation to the College, we will also record your donation and/or pledge details on your record, including Gift Aid status, where applicable (as required by HMRC).

We will keep a record of contact with you and your attendance at College events or activities. We will also keep a note of any changes you tell us about, including when you change your address, or name. You can keep your personal and employment details up to date by contacting [enquiries@spurgeons.ac.uk](mailto:enquiries@spurgeons.ac.uk).

We also collect information by tracking which pages you visit when you click on links to our website in our emails, and may use this information to personalise the way our websites and emails are presented to you.

The College does not store any credit/debit card details and is fully PCI-DSS compliant.

## How we use your personal information

We will only process your data for the specific purposes that we tell you and then only to the extent necessary for that specific purpose.

Your personal information will be used to provide any services you have requested and to keep in touch with you as a valued supporter of Spurgeon's College. We may communicate with you about the following:

- College updates and news
- Publications
- Invitations to events
- Ways to get involved
- Fundraising
- Services you have requested or that may be of interest
- Administrative purposes (e.g. processing donations or gift aid)

We will ask for your consent to contact you for specific purposes and will only contact you through the communication channels you have consented to. Unless you have requested otherwise, your data is used and processed for the full range of supporter activities and programmes and all relevant communications, fundraising and marketing activity. Note that we may have to contact you for a reason where your consent is not required, for example to comply with the law or to fulfil a contractual obligation.

Contact details provided directly by you will update any previous in relation to this channel unless you inform us otherwise. If you are registered with the Telephone Preference Service (TPS) but provide us with a telephone number which you have consented for us to use, we call you on this number. We will not use any channel of communication which you have not consented to.

Your data will not be disclosed to external organisations other than those acting as agents for the College. We always make sure there are appropriate controls in place so that your data will remain secure. We will never sell, trade or give away your data.

We may use third-party partners to support the activities described above. If you interact with the College through a third party (for example, supporting Spurgeon's via JustGiving) then we may obtain information about you from that third party. The receipt of data in this manner is subject to the third party's own privacy policy. A list of parties with whom we partner in this way is available on request. Data obtained in this way are treated no differently to any other once held by the College, and are bound by the terms of this Privacy Notice as soon as they are received.

Tools may be used to help us improve the effectiveness of the College's communications with you, including tracking whether the emails we send are opened and which links are clicked within a message. We monitor (using cookies) website visits and use tools such as

Google Analytics to improve our website and services. Further information on cookies, and how to disable them if desired can be found in our Cookie Policy.

We may analyse the personal information we collect to create a profile of your interests and preferences so that we can contact you in the most appropriate way and with the most relevant information. We may also use your data to help plan our supporter engagement activity and fundraising. This may include wealth screening whereby publically available information (for example press cuttings, the Charity Commission Register), together with information from third party suppliers, could be used to assess capacity to provide philanthropic support to the College. Wealth screening enables us to understand the background of our alumni and other stakeholders, and to make appropriate requests to those who may have the means and the inclination to give more.

### **Protecting your data & sharing data with third parties**

We are committed to holding your data securely and treating them with sensitivity. All data are held securely and in accordance with the Data Protection Act 1998. Your data are held on a database hosted on a secure server within the College's IT network. Access is restricted to staff and volunteers who need to see the data to carry out their duties at the College. User access rights to the database are restricted according to individual job roles in order to ensure that users only see information relevant to them. This access is reviewed on a regular basis.

Unless we have a legal obligation to do so, we will not disclose your data to individuals, organisations or other entities outside the College other than those which are acting as agents for the College (for example, if we use a company to print and send out documents). All external entities with whom data are being shared and to whom we are not legally bound must sign a contract and/or confidentiality and non-disclosure agreement before any data transfer takes place. We do not sell to or trade your data with any other organisations.

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 trusted partners' servers are located in a country outside the EEA. Where these countries do not have similar data protection laws to the UK, we will take steps to make sure they provide an adequate level of protection in accordance with UK data protection law.

We may need to disclose your information to a third party if required by law (for example to government bodies and law enforcement agencies) or if we have your permission to do so.

### **How long we keep your information**

Spurgeon's College considers its relationship with its supporters to be lifelong, and we will hold your details until you tell us you no longer wish to hear from us. Generally, we will process your personal data only as long as is necessary for the purpose(s) for which it was collected (unless otherwise advised) and in accordance with the College's records retention schedule. Sometimes we are obliged by law to keep your data for a certain length of time

e.g. HMRC requires that we keep a record of your name, address and Gift Aid declaration for six years from the date of your last donation. Data will be kept securely and destroyed appropriately when no longer required. The College may also decide to archive some data.

## **Your rights & how to contact us**

We will always try to ensure that the data we hold for you are up to date, reasonable and not excessive. You will always have the right to:

- Be informed as to how we use your data (via this Privacy Notice)
- Access or request a copy of the data we hold about you
- Update, amend or rectify the data we hold about you
- Change your communication preferences at any time to restrict how we process your data, or opt out of some or all communication from College Conference
- Ask us to remove your data from our records
- Withdraw consent, where it is used as a legal basis for processing
- Object to or restrict the processing of your information for any of the purposes outlined above.

If you have any questions about this Privacy Notice, your data rights, or would like to receive a copy of the information we hold about you, please contact:

**Rev Helen Stokley**

**Data Protection Officer  
Spurgeon's College  
South Norwood Hill  
London  
SE25 6DJ**

**[h.stokley@spurgeons.ac.uk](mailto:h.stokley@spurgeons.ac.uk)**

**+44 (0)20 8653 0850**

If you feel that we have let you down in relation to your information rights then please contact us so that we can discuss this with you and rectify the situation.

You can also make complaints directly to the Information Commissioner's Office (ICO). The ICO is the independent authority upholding information rights for the UK. Their website is [ico.org.uk](http://ico.org.uk) and their telephone helpline number is 0303 123 1113.

From time to time, we may use your information for new purposes not currently described in this Privacy Notice. If our information practices change at some time in the future, we will always post the policy changes on this page.

Last updated on: 17/4/18