



## Donor Privacy Notice

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### Amendment History

Version	Revision Summary	Date Approved	Author



# Donor Privacy Notice

## Introduction

1. Our donors are extremely important to Spurgeon's College. We recognise the great contribution you make in supporting our work financially, through prayer, or by other means.
2. This Privacy Notice explains how Spurgeon's College collects, stores, manages and protects your data. 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.
3. The College is the 'Data Controller' of your personal data and is subject to the Data Protection Act 2018 and the UK General Data Protection Regulations (UK GDPR). We are registered with the Information Commissioner's Office (ICO).

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

4. 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.
5. All information you provide to us will be used in accordance with the College's Data Protection Policy.
6. The College will process your data only when we are satisfied that we have a lawful basis for doing so. We may process your data because we have a legitimate reason to process your data to enable us to process your donation, an information request from you, or provide you with a service you have requested. There may also be circumstances where we will process your data because you have given us your consent, we have entered a contractual arrangement with you or because it is necessary to fulfil a legal obligation.

## **How do we collect information on you?**

7. The information we hold has been provided when you have donated to us or from direct updates you have provided us.

## **What data do we process?**

8. The personal information we normally hold includes:
  - Name and Title
  - Contact details (address, telephone, email)
  - Details of your donation and donation history, including gift aid status where applicable (as required by HMRC)
9. We may keep a record of our communications with you, including data updates you have provided. You can keep your personal details up to date by contacting [enquiries@spurgeons.ac.uk](mailto:enquiries@spurgeons.ac.uk).
10. 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 (see our [Website Privacy Notice](#)).
11. As part of Direct Debit arrangements, the College does store credit/debit card details. The College is fully Payment Card Industry Data Security Standard (PCI-DSS) compliant.
12. The College does not hold any special category personal data for donors.

## **How do we use your data?**

13. 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.
14. We may use your data to:
  1. Undertake administrative activities such as donation management and stewardship (including due diligence), processing and submitting HM Revenue and Customs Gift Aid claims and other mandatory reports required by law.
  2. Provide any services you have requested.
  3. Correspond with you, e.g., send you a thank you letter, provide updates on the College or invite you to an event.
15. Before accepting major donations directly, we are required to conduct due diligence, including reviewing publicly available personal data.
16. Contact details provided directly by you will update any previous details held in relation to this channel unless you inform us otherwise. If you are registered with the Telephone Preference Service (TPS) and provide us with a telephone number you have consented for us to use, we will call/text you on this number.

17. 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.
18. We may use third-party partners to support the activities described above. If you interact with the College through a third party, 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. 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.

### **Who do we share your data with?**

19. 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.
20. We do not sell, trade or give away your data to any other organisations.
21. We may need to disclose your data 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.

### **International data transfer**

22. Although most of the data we store and process stays within the UK, some information may be transferred to countries outside the UK. This may occur if, for example, one of our trusted partners' servers are located in a country outside the UK. 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.

### **How do we protect your data?**

23. We are committed to holding your data securely and treating them with sensitivity. Your personal data will be stored securely in our database which is part of Spurgeon's IT infrastructure and otherwise held in accordance with the Data Protection Act.
24. We limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.
25. Where we engage third parties to process personal data on our behalf, they do so on the basis of written instructions contained within a contract, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.
26. We have put in place procedures to deal with any suspected data breach. If you

suspect a data breach has occurred at the College, the organisation has a duty to report this to the Information Commissioners Office (ICO) within 72 hours. Please report suspected data breaches to the Data Protection Officer as soon as you can.

### **How long do we hold your data for?**

27. The College will hold your 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. We may be obliged by law to keep your data for a certain length of time e.g., HMRC requires we record 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 and how to contact us**

28. We will always try to ensure that the data we hold for you are up to date, reasonable and not excessive. In certain circumstances, by law you 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 us
  - 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.
29. If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Data Protection Officer.
30. You will not have to pay a fee to access your data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access requires a lot of copying, is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.
31. We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.
32. Where you wish to restrict the use of your data for the purposes outlined above, please note that we may need to retain some limited data to facilitate

this request.

33. 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**

**dpo@spurgeons.ac.uk**

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

34. 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.
35. 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.
36. From time to time, we may use your data 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.