



Supporters Privacy Notice

Introduction

1. Our supporters are extremely important to Spurgeon's College. We recognise the great contribution you make in supporting our work financially, through prayer, volunteering your time, or 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 General Data Protection Regulation 2016 (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 (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.
6. Spurgeon's College may process the information outlined in this privacy notice for the purposes of:
 - Communicating with current and potential supporters
 - Providing benefits and services to supporters
 - Furthering the College's educational charitable mission (which includes fundraising and securing the support of volunteers)
 - Enabling the College to achieve its strategic and operational goals
 - Administrative purposes (e.g. processing donations or gift aid).
7. The College relies on your consent as the legal basis for most of this processing, where this is not overridden by the interests and rights or freedoms of the data subjects concerned. We recognise that this 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. Examples include:

- to fulfil contractual obligations we may have when you make a purchase from us
- to fulfil our legal obligations around gift aid and other financial regulations where you have made a donation or payment
- because we have a legitimate reason to process your data to enable us to process an information request from you or provide you with a service you have requested.

How do we collect personal information?

8. The vast majority of the information we hold is obtained directly from you. We obtain personal information from you when you graduate, enquire about our activities, register for an event, make a donation to the College or otherwise provide us with personal information.

What personal information do we process?

9. The personal information we collect will depend on the purpose of your interaction with the College. The data we may process includes name, date of birth, contact details including email address and mobile number. Other information we may collect might also include career and employment history, areas of interest and potential interest, 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 details of your donation and/or pledge, including Gift Aid status where applicable (as required by HMRC).
10. We may keep a record of our 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.
11. Spurgeon's College maintains a record of all former students and, as such, we hold education records in perpetuity.
12. 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 Policy).
13. The College does not store any credit/debit card details and is fully PCI-DSS compliant.
14. The College will also process some information that is considered more sensitive. This is referred to as 'special category' personal data in the General Data Protection Regulation and Data Protection Act 2018. Special category personal data is defined as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health or sex life and sexual

orientation, genetic data and biometric data which is processed to uniquely identify a person. In the UK this also includes any personal information relating to criminal convictions and offences.

15. When we process this type of information we are required to apply additional protections. We may require your consent to process sensitive information, or we may process it because we have a legal requirement to do so. For example, we may process special category data you have given us in order to fulfil any dietary requirements you have. This data is processed under social protection law relating to Food Safety and Allergens.

How do we use your personal information?

16. 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.
17. Your personal information will be used to administer any gifts or donations, provide any services you have requested and/or to keep in touch with you as a supporter. 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
18. We will ask for your consent to contact you for specific purposes and will only contact you through the communication channels (telephone, email, post or social media) 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.
19. 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) and provide us with a telephone number you have consented for us to use, we will call you on this number. We will not use any channel of communication which you have not consented to.
20. 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.
21. 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 'Virgin Money Giving') 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.

22. 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 Website Privacy Policy.
23. For those that have consented to receive marketing communications, 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.
24. We do not use your personal information to carry out automated decision-making processes.

Who do we share your personal information with?

25. 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).
26. Certain third-party service providers, such as payment gateways and other payment transaction processors, have their own privacy policies in respect to the information we are required to provide to them for your purchase-related transactions. For these providers, we recommend that you read their privacy policies so you can understand the manner in which your personal information will be handled by these providers.
27. We do not sell to or trade your data with any other organisations.
28. 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.

International data transfer

29. 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.

How do we protect your personal information?

30. 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.
31. 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.
32. 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.
33. 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 keep your personal information?

34. 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. 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

35. 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

Document control box			
Title	Supporters Privacy Notice		
Date approved	November 2018	Implementation date	November 2018
Updated	November 2019	Next Review Due	November 2020
Version	2	Supersedes version	1
Approving body		Governors	
Quality Code consulted			
Member of staff responsible		Director of Operations	