



# Website Privacy Notice

## 1. Introduction

Spurgeon's College is committed to looking after any personal information that is made available to us when you visit our website at <http://www.spurgeons.ac.uk> in accordance with data protection law.

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).

This notice outlines what categories of information we retain and how we use it.

## 2. What personal information do we collect?

### Automatic information collection

When you visit Spurgeon's College website the following information is received and stored by our web servers: anonymised details of your IP address, browser type and operating system; the web pages you visited and the date and time of your visit. This data is known as web server logs and is a standard function of web serving technology. We use this information in an aggregated form strictly to analyse how the college website is used by our visitors or for problem solving purposes. We may archive this information in an anonymous form for historical records.

### Personal data

You don't have to create an account or provide us with any personal information to access the College website. However, we may ask for some personal details if you wish to access some of our services or for us to respond to a request from you, for example:

- to register for open days;
- to order a publication or course;
- to subscribe to email marketing communications such as online newsletters.

The vast majority of the personal information we hold about you will be obtained via our websites' forms or if you contact us by email.

Some of the personal data we store and process may include:

- biographical information consisting of your name, title, birth date, age and gender;
- your contact details including address, email address and phone number;
- information about your time at the College;
- your professional activities;
- current interests and preferences;
- records of communications sent to you by the College or received from you;
- attendance at College events.

Any personal information which you provide via the website, such as your name and address, will only be used only for the specific purpose stated. We process this information which you have provided as we have a legitimate interest to do so, following a request from you.

We will never sell, trade or license this information to other parties. We never provide website users' personal information to direct marketing companies or similar organisations.

### **3. How do we use the information we collect?**

Automatic information we gather arising from your visit to the website is used to ensure that we understand who uses our site, how our site is used, to improve our site and ensure it is secure. This processing occurs because it is necessary to meet our legitimate interests in operating and improving the website, analysing its use, and ensuring its security.

Personal information that you provide is used to respond to your request for information or a service.

We will only use your data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another related reason and that reason is compatible with the original purpose. If we need to use your data for an unrelated purpose, we will seek your consent to use it for that new purpose.

We may store data collected by the website manually or electronically. The data is stored on our secure servers and/or within the College premises.

When you provide us with your contact details you may be asked whether you wish to receive any further communications from us. You will receive information only about the specific services or products to which you have consented.

If after you opt-in, you change your mind, you may withdraw your consent for us to contact you, for the continued collection, use or disclosure of your information, at anytime, by contacting us at [enquiries@spurgeons.ac.uk](mailto:enquiries@spurgeons.ac.uk) or mailing us at: Spurgeon's College, 189 South Norwood Hill, London, SE25 6XQ

#### **4. Who do we share your personal information with?**

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 third parties who provide services on our behalf, such as those who help us to operate the website. All our third-party service providers are required to take appropriate security measures to protect your data in line with our policies. We permit them to process your data only for specified purposes and in accordance with our instructions.

We do not sell to or trade your data with any other organisations.

We may also share your personal data with third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our site terms of use or to protect the rights, property or safety of our site, our users, and others.

Where your data is shared with third parties, we will seek to share the minimum amount necessary.

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.

#### **5. International data transfer**

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 is 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.

#### **6. How long do we keep your information for?**

We will only retain your data for as long as we need it to fulfil our purposes, including any relating to legal, accounting, or reporting requirements. Details of how long different categories of personal information are retained by the College are published in the Records Retention Schedule.

#### **7. Web shop and financial information**

Our web based store is hosted on Shopify Inc. They provide us with the online e-commerce platform that allows us to sell our products and services to you. Your data is stored through Shopify's data storage, databases and the general Shopify application. They store your data on a secure server behind a firewall.

If you choose a direct payment gateway to complete your purchase, then Shopify stores your credit card data. It is encrypted through the Payment Card Industry Data

Security Standard (PCI-DSS). Your purchase transaction data is stored only as long as is necessary to complete your purchase transaction. After that is complete, your purchase transaction information is deleted.

All direct payment gateways adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of credit card information by our store and its service providers. For more insight, you may also want to read Shopify's Terms of Service here or Privacy Statement here.

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

## **8. Cookies**

Our websites use 'cookies' which are small files downloaded onto your device when you browse websites. Cookies help webpages display properly and help us understand how you use our website. You can learn more about cookies at [www.allaboutcookies.org](http://www.allaboutcookies.org).

Cookies don't collect personal data from your computer, only the data created by your browsing. The information we gather through cookies includes things such as your physical location and your computer's IP address.

Some cookies are essential to website functionality ('strictly necessary cookies') whilst others you can opt out of or block.

Preference Cookies store your user preferences in order to improve your experience on the website. While they aren't strictly necessary, you may have to re-enter preferences every time if they are disabled.

Performance Cookies allow us to track the performance and usage of our website with anonymised 'statistics'.

Marketing cookies are used to track visitors across websites. The intention is to display ads which are relevant for the individual. Some third party services may use these cookies e.g. You Tube.

You can choose not to accept cookies by changing your browser settings or deleting existing cookies installed on your computer (see below).

Two types of cookies are used on this website:

- **Session Cookies.** These are temporary cookies, which only exist for the period you access the website (or more strictly, until you close the browser after accessing the website). Session cookies help the website remember what you chose on the previous page, therefore avoiding having to re-enter information.

- **Persistent Cookies.** These are cookies which remain on your device after you have visited our website. These cookies help us identify you as a unique visitor (by storing a randomly generated number).

The length of time a cookie will remain on your device will depend on the type of cookie.

The College uses cookies for a variety of reasons, including to:

- make the website work as you'd expect
- remember your preferences during and between visits
- allow you to share pages with social networks
- collect anonymous data that helps the College improve the website
- record session information, such as items that consumers add to their shopping cart
- customise web page content on visitors browser type or other information that the visitor sends

The most common type of cookie used on the Spurgeon’s College web site is set by Google Analytics, which provides anonymous statistical data to us to show usage trends and to aid in making decisions about what types of content are most popular.

In addition, some third-party services we use also store cookies. For more information on the cookies used by these third parties see their Privacy/Cookie policies:

- [Facebook](#)
- [Twitter](#)
- [YouTube](#)

Cookie Name	Cookie Description	Cookie Classification	Cookie Behaviour
ASP.NET_SessionId	Randomly generated session ID. Our suppliers have deemed this as essential to the operation of the service.[Find out more about this cookie from Microsoft Support.]. also used by SHOPIFY	Strictly necessary cookie	Session cookie - disappears when the user closes the browser.
_utma	Google Analytics. Used by Google Analytics to track user count of visits to a site, when a first visit was, and a last visit.	Performance cookie	Persistent cookie, lasts for 2 years
_utmb	Google Analytics. Used by Google Analytics to track exactly when a user visits a site.	Performance cookie	Persistent cookie, lasts for 30 minutes
_utmc	Google Analytics. Used by Google Analytics to track exactly when a user leaves a site.	Performance cookie	Session cookie - disappears when the user closes the browser.
_utmt	Google Analytics. Used by Google Analytics to.	Performance cookie	Session cookie - disappears when the user closes the browser.
_utmz	Google Analytics. Used by Google Analytics to track how a user got to this site (where from), what link was used, what search engine and term.	Performance cookie	Persistent, lasts for 6 months.

_SHOPIFY_VISIT	SHOPIFY. Used to record the number of visits.	Performance cookie	Persistent, lasts for 30 minutes from last visit.
_SHOPIFY_UNIQ	SHOPIFY. Used to count the number of visits to the store by a single customer	Performance cookie	Persistent, expires midnight of the next day.
_SHOPIFY_CART	SHOPIFY Stores information about the contents of your cart.	Performance cookie	Persistent, lasts for two weeks.
Storefront_digest	SHOPIFY If the shop has a password, this is used to determine if the current visitor has access.	Performance cookie	Persistent, indefinite.

## 9. Disabling cookies

You can disable cookies set by this or any other website by adjusting the settings on your internet browser. However, if you do so, some parts of our website might not work properly for you. To find out more, visit [allaboutcookies.org](http://allaboutcookies.org).

Google also provides website visitors [Google Analytics opt-outs](#) for the web, which provides a browser add-on for opting out of Google Analytics tracking altogether.

## 10. Links to third party websites

Our site contains links to and from various third party websites. Inclusion of the other sites by links does not imply any endorsement of the material or information on the other sites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please look at their privacy statements to make sure you are happy with how they will handle your data before you submit any personal information.

## 11. Information security

We recognise that many people are concerned about the privacy and protection of information as it is transmitted over the Internet. We are committed to taking all reasonable steps to keep your information secure.

You should keep in mind, however that when you email us, the possibility exists, however remote, that unauthorised people might be able to intercept your message. You should never use unsecure forms and email to send personal data such as financial information to us. We aren't responsible for the privacy of emails except those stored on our own servers.

When we receive personal data through forms, we use 'Formsite' which is a third party secure site.

## 12. Your rights and 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. 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.

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.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

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.

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

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.

<b>Document control box</b>			
Title	Website Privacy Notice		
Date approved	29 September 2018	Implementation date	September 2018
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Member of staff responsible	Director of Operations		