



## Privacy Notice

Essential Christian is committed to protecting your privacy. This Privacy Notice explains our data processing practices and your options regarding the ways in which your personal data is used. If you have any queries concerning your personal information or any questions with regard to our data handling please contact us at [recruitment@essentialchristian.org](mailto:recruitment@essentialchristian.org).

Details provided to Essential Christian will be stored on a database and used as described below. Essential Christian is the data controller.

### Information Collected

Essential Christian collects the details you provide in the online application process and via other Essential Christians websites.

The categories of personal data we process may include:

- Contact information,
- DBS certificate no. and issue date
- Photograph for use on ID badge or in marketing materials
- Declarations about health and background (criminal records etc.)
- Bank details (with restricted access for use when paying travel expenses or wages)
- National Insurance Number
- Date of Birth
- Nationality

Data may be collected through various means including online or paper forms, orders and transactions, and by recording visits to the website. It may also be collected through telephone calls and correspondence. We will use this data in the processing of delegate registrations, resource orders and literature requests, and for appointing and accommodating team members.

Our legal basis for processing personal data is that:

1. Processing the personal data is necessary for the purpose of carrying out the volunteer arrangement or agreement, or contract of employment or to take steps to enter into a volunteer arrangement or agreement or contract of employment;
2. Processing the data is necessary for the purposes of our “**legitimate interests**” as the data controller (except where such interests are overridden by the interests, rights or freedoms of the individual);
3. The processing of some sensitive data is carried out in the course of the legitimate activities of Essential Christian as a charity.

Our “legitimate interests” for these purposes are:

1. the need to process data on applicants for the purposes of assessing suitability for engagement as a volunteer or employment and then carrying out the arrangement, agreement or contract;
2. the need to gather data for the purposes of safeguarding the health and safety of applicants, employees, volunteers and team members;
3. the need to transfer applicant, volunteer and employee data intra-group for administrative purposes; and
4. the need to process applicant, volunteer and employee data for the purposes of ensuring network and information security.

There is no strict statutory or contractual requirement for you to provide data to us but if you do not provide at least that data that is necessary for us to assess suitability for engagement by us then it will not practically be possible for us to engage you as a volunteer or employee.

### **Sensitive Personal Information**

In order to appoint volunteers, team members and employees we may need to ask for information regarding your religious beliefs, physical or mental health, child protection or criminal matters to the extent necessary for carrying out our obligations as an employer or event organiser; or the processing of some sensitive data may be necessary in the course of the legitimate activities of Essential Christian as a charity. That will be assessed on a case by case basis.

### **Recipients of personal data**

Your personal data may be received by the following categories of people:

1. Our HR department;
2. In the case of job applicants, the interviewer and prospective manager;
3. Any individual authorised by us to maintain personnel files or access personal information;
4. Our professional advisers; and
5. Appropriate external regulators and authorities (such as HMRC and HSE)
6. Butlins, where appropriate

We do not envisage that your data would be transferred to a third country (ie. a country outside the European Union). If we perceive the need to do that we would discuss that with you and explain the legal basis for the transfer of the data at that stage.

### **Duration of storage of personal data**

We will keep personal data for no longer than is necessary, having regard to the original purpose for which the data was processed. In some cases we will be legally obliged to keep your data for a set period. Examples are below:

Income tax and NI returns, income tax records and correspondence with HMRC: We are obliged to keep these records for not less than 3 years after the end of the financial year to which they relate.

Wage and salary records: We are obliged to keep these records for 6 years.

### **Referees' Information**

We will also ask for details of referees and will use this information to make the necessary checks. This data may be passed on to an authorised recipient of your personal data for processing. The information that you give about yourself may be passed onto your referee.

### **Disclosure of contact information to other volunteers**

Where volunteers may need to contact others to help with the preparation before the event, we will include your contact details in the handbook. We will not include addresses which you mark as ex-directory.

### **Disclosure & Barring Service Information**

Essential Christian's policy is that some volunteers will be required to obtain a Disclosure from the DBS. The only information we hold on our database regarding individual Disclosures is the issue date, disclosure number and the recruitment decision. For more information on how we handle this data, please refer to our Secure Storage and Handling Policy.

### **Protection of information**

Essential Christian follows relevant data protection requirements and uses all reasonable precautions to ensure the security of your data.

Information will not be shared with third parties except where they are acting as agents on behalf of Spring Harvest or to comply with a legal obligation.

We will not make your data available to third parties for any other purposes (eg marketing) without your prior consent.

The website may contain links to other third party websites. However, we cannot be responsible for the content of these websites, nor for any use made by others of data you enter through these third party websites.

### **Cookies**

'Cookies' are small pieces of information sent by a web server and used by a browser to store information on your computer's hard drive. Each cookie can only be read by the web server that originally issued it. Cookies cannot profile your system or collect information from your hard drive. You can find out more about how the cookies work on [www.cookiecentral.com](http://www.cookiecentral.com) Essential Christian uses cookies to store user identification to help us ensure the security and authenticity of registered users and for traffic monitoring. We do not use cookies to store address or contact information, or any other personal information.

If you do not want to accept cookies you can alter the settings of your web browser – see the Help section within your browser.

## **Your rights in relation to your personal data**

### 1. The right to be forgotten

You have the right to request that your personal data is deleted if:

- a) it is no longer necessary for us to store that data having regard to the purposes for which it was originally collected; or
- b) in circumstances where we rely solely on your consent to process the data (and have no other legal basis for processing the data), you withdraw your consent to the data being processed; or
- c) you object to the processing of the data for good reasons which are not overridden by another compelling reason for us to retain the data; or
- d) the data was unlawfully processed; or
- e) the data needs to be deleted to comply with a legal obligation.

However, we can refuse to comply with a request to delete your personal data where we process that data:

- a) to exercise the right of freedom of expression and information;
- b) to comply with a legal obligation or the performance of a public interest task or exercise of official authority;
- c) for public health purposes in the public interest;
- d) for archiving purposes in the public interest, scientific research, historical research or statistical purposes; or
- e) the exercise or defence of legal claims.

### 2. The right to data portability

You have the right to receive the personal data which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided (us) where:

- a) the processing is based on consent or on a contract; and
- b) the processing is carried out by automated means.

Note that this right only applies if the processing is carried out by “automated means” which means it will not apply to most paper based data.

### 3. The right to withdraw consent

Where we process your personal data in reliance on your consent to that processing, you have the right to withdraw that consent at any time. You may do this in writing to the HR team via [recruitment@essentialchristian.org](mailto:recruitment@essentialchristian.org)

4. The right to object to processing

Where we process your personal data for the performance of a legal task or in view of our legitimate interests you have the right to object on “grounds relating to your particular situation”. If you wish to object to the processing of your personal data you should do so in writing to HR via [recruitment@essentialchristian.org](mailto:recruitment@essentialchristian.org) stating the reasons for your objection.

Where you exercise your right to object we must stop processing the personal data unless:

- we can demonstrate compelling legitimate grounds for the processing, which override your interests, rights and freedoms; or
- the processing is for the establishment, exercise or defence of legal claims.

5. The right of subject access

So that you are aware of the personal data we hold on you, you have the right to request access to that data. This is sometimes referred to as making a “subject access request”.

6. The right to rectification

If any of the personal data we hold on you is inaccurate or incomplete, you have the right to have any errors rectified. Where we do not take action in response to a request for rectification you have the right to complain about that to the Information Commissioner’s Office.

7. The right to restrict processing

In certain prescribed circumstances, such as where you have contested the accuracy of the personal data we hold on you, you have the right to block or suppress the further processing of your personal data.

8. Rights related to automated decision making and profiling

The GDPR defines “profiling” as any form of automated processing intended to evaluate certain personal aspects of an individual, in particular to analyse or predict:

- performance at work;
- economic situation;
- health;
- personal preferences;
- reliability;
- behaviour;
- location; or
- movement

You have the right not to be subject to a decision when it is based on automated processing; and it produces a legal effect or a similarly significant effect on you. However, that right does not apply where the decision is necessary for purposes of the performance of a contract between you and us. We may use data related to your performance or attendance record to make a decision as to whether to take disciplinary action. We consider that to be necessary for the purposes of conducting the employment contract. In any event that is unlikely to be an automated decision in that action will not normally be taken without an appropriate manager discussing the matter with you first and then deciding whether the data reveals information such that formal action needs to be taken. In other words there will be “human intervention” for the purposes of the GDPR and you will have the chance to express your point of view, have the decision explained to you and an opportunity to challenge it.

### **Complaints**

Where you take the view that your personal data is processed in a way that does not comply with the GDPR, you have a specific right to lodge a complaint with the relevant supervisory authority. The supervisory authority will then inform you of the progress and outcome of your complaint. The supervisory authority in the UK is the ICO.

### **Amendments**

Any changes to this Privacy Notice will be posted on the website.