# Privacy Notice

**How New Life Trust operating as Christchurch Newport ("we") uses your information**

Your privacy is important to us. We are committed to safeguarding your personal data in accordance with UK Data Protection legislation (UK GDPR and Data Protection Act 2018).

**Why We Collect and Use Your Information**

We collect and process your personal information for specific purposes. UK GDPR requires us to have a lawful basis (under Article 6) for each processing activity:

| Purpose | Lawful Basis (Article 6) & Our Legitimate Interests |
|---|---|
| **Church administration & membership** | **Legitimate interests:** To efficiently run church operations, maintain member directories, and coordinate groups and rotas. |
| **Pastoral care** | **Legitimate interests & Explicit consent:** To provide pastoral support and care to our church community. |
| **Routine church communications** | **Legitimate interests:** To keep our congregation informed about regular services, events, and church news. |
| **Promotional & direct marketing** | **Consent:** for electronic messaging like news emails. |
| **Accounting & financial management** | **Legal obligation:** To maintain financial accounts in accordance with charity and tax laws. |
| **Payroll & staff management** | **Contract & Legal obligation:** To fulfil employment contracts and satisfy tax/pension laws. |
| **Safeguarding** | **Legal obligation & Legitimate interests:** To protect children and vulnerable adults in line with statutory duty. |

| Purpose | Lawful Basis (Article 6) & Our Legitimate Interests |
|---|---|
| **Processing donations & Gift Aid** | **Legal obligation** (HMRC Gift Aid compliance) and **Legitimate interests** (processing general donations). |
| **Managing volunteers** | **Legitimate interests:** To coordinate volunteer rotas, roles, and church activities. |
| **CCTV operation** | **Legitimate interests:** To maintain security and safety on church premises. |

*Please note, where processing is based on consent, you may withdraw your consent at any time.*

**Categories of Data We Collect**

We may collect, store, and share the following categories of data:

- **Personal Information:** Name, address, telephone number, email address, family details, age, marital status, donation/financial details, and volunteer records.
- **Personal Characteristics:** Gender, language, and nationality.
- **Special Category Data:** Information revealing religious beliefs, pastoral notes, or health/medical information.
- **Criminal Offence Data:** DBS check details collected strictly where necessary for safeguarding roles.

**Processing Special Category & Criminal Data**

As a religious non-profit organization, processing some of your data may reveal your religious beliefs. We rely on *Article 9(2)(d) of UK GDPR* (legitimate activities of a non-profit body with a religious aim) and explicit consent where appropriate. Where we process Criminal Offence data for safeguarding, we rely on *Schedule 1 of the Data Protection Act 2018* (safeguarding of children and individuals at risk).

Some personal information is necessary for us to meet our legal obligations or to enter into and manage employment arrangements. Where information is required for a particular process, we will explain whether it is a legal or contractual requirement and

the consequences of not providing it. If you do not provide information that is necessary for that process, we may be unable to complete it, for example, process a Gift Aid claim or carry out a required safeguarding check.

**How We Use Third-Party Services**

To help run Christchurch, we work with trusted external service providers:

- **Accounting (Sage & External Accountants):** We use Sage software and external accountants to manage financial records and meet statutory obligations.
- **Website & Mobile App (Subsplash):** We use Subsplash to host our church website and app, processing data related to app usage, user accounts, media streaming, and forms.
- **Church Management (ChurchSuite):** We use ChurchSuite to manage membership records, rotas, communications, and donations.
- **Technical Sub-Processors & Payment Gateways:** Our software platforms rely on secure cloud sub-processors for data hosting, email/SMS delivery, and online payments (e.g., Stripe, GoCardless). All providers operate under strict data processing agreements.

**International Data Transfers**

We use cloud-based services and software providers to help us run Christchurch, including Microsoft 365, Google Workspace, ChurchSuite, Sage and Subsplash. Some of these providers, or the organisations they use to deliver their services, may store or process personal information outside the United Kingdom, including in the United States.

Where personal information is transferred outside the UK, we will ensure that the transfer is permitted under UK data protection law and that appropriate safeguards are in place where required. Depending on the provider and the circumstances of the transfer, these safeguards may include the UK Extension to the EU–US Data Privacy Framework, an International Data Transfer Agreement (IDTA), or the UK Addendum to the EU Standard Contractual Clauses.

If you would like further information about international transfers involving your personal information, including details of the safeguards that apply, please contact our Data Protection Lead using the contact details provided in this notice.

**Technical Sub-Processors & Infrastructure**

To deliver their software services, our main platforms (ChurchSuite, Sage, and Subsplash) utilise technical sub-processors for functions such as secure cloud data hosting, automated email/SMS delivery, and online payment processing. All sub-processors operate under strict data processing agreements to ensure your data remains protected. Information regarding specific sub-processors is available via the privacy policies of these respective platforms or upon request.

**Data Retention**

We retain personal data only as long as necessary:

- **Financial & Gift Aid records:** Retained for 6 years following the end of the tax year to comply with HMRC requirements.
- **Membership & Rota details:** Normally retained while you are an active participant and for up to one year afterwards, unless a different retention period is justified by our legal obligations or other applicable circumstances.
- **Safeguarding records:** Retained in accordance with national statutory safeguarding retention guidelines.

For full details, please refer to our Data Retention Policy.

**Your Data Protection Rights**

Under UK GDPR, you have the following rights:

1. **Right to be informed** about how your data is used.
2. **Right of access** to obtain a copy of your personal data.
3. **Right to rectification** of inaccurate or incomplete data.
4. **Right to erasure** ("right to be forgotten") under certain conditions.
5. **Right to restrict processing** of your data.
6. **Right to data portability** to move your data to another service.
7. **Right to object** to processing based on legitimate interests or direct marketing.
8. **Rights regarding automated decision-making:** We confirm that we do **not** carry out any automated decision-making or profiling.

Where processing is based on consent, you may withdraw your consent at any time without affecting lawful processing carried out prior to withdrawal.

**Contact & Complaints**

If you have questions, wish to exercise your rights, or have a concern about how your data is handled, please contact our Data Protection Lead:

- **Name:** Gavin Smith
- **Email:** gav@christchurchnewport.co.uk
- **Phone:** 01633 822211
- **Address:** Christchurch Centre, BT Compound, Old Malpas Road, Newport, NP20 5PP

You also have the right to lodge a complaint directly with the **Information Commissioner's Office (ICO)** at ico.org.uk/concerns or by calling 0303 123 1113.