



YARNTON GOSPEL WORKERS TRUST

PRIVACY POLICY

1. Introduction

Yarnton Gospel Workers Trust ("YGWT") seeks to multiply gospel workers across England and Wales, to serve in local churches, reaching the lost. YGWT is committed to protecting individuals' rights and privacy in accordance with the General Data Protection Regulation (the "GDPR") and other applicable data protection law.

This policy has been adopted by the trustees of YGWT (and shall be amended from time to time) to ensure compliance with data protection law. The trustees of YGWT have overall responsibility for YGWT's compliance with data protection law. The Administrator of YGWT is responsible for managing data held by YGWT on an ongoing basis in accordance with this policy.

2. Key definitions

Certain key definitions used in this policy are as follows:

- **'personal data'** is any information about a living individual which allows them to be identified from that data (for example a name, photographs, email address, or address), either by the information alone or in conjunction with any other information
- **'processing'** refers to any action concerning personal data (including using the data to process grant applications or send communications, storing the data and sharing the data)
- **'data controller'** refers to any person or organisation who processes personal data, and determines what data is to be processed and the purposes for which it is to be processed
- **'data processor'** refers to any natural person who processes data on behalf of (and under instruction by) a controller
- **'data subject'** refers to any individual who has personal data being processed by a controller, whether provided by the individual or taken from other sources

3. Collection of personal data by YGWT

YGWT will collect personal data from a number of sources, including:

- grant-making (including through grant applications and church questionnaires)
- use of the YGWT website (including the Contact form) and other communication requests
- job applications
- event registrations
- other sources, including publicly available information and through church networks

4. The types of personal data processed by YGWT

YGWT may therefore collect and process personal data including the following (to the extent that these are relevant to our activities and/or you provide this information to us):

- names, titles, and aliases
- contact details such as telephone numbers, addresses, and email addresses



- demographic information such as gender, age, date of birth, marital status, nationality, education/work history, qualifications, hobbies and family composition, and dependants
- financial identifiers such as bank account numbers, payment card numbers and payment/transaction identifiers

The data we process is likely to constitute sensitive personal data because, as a Christian charity, the fact that we process your data at all may be suggestive of your religious beliefs.

5. Use of personal data by YGWT

YGWT uses personal data in a wide range of activities related to its work. The purposes for which YGWT may use personal data includes the following:

- to carry out YGWT's stated activities, including receiving and processing grant applications
- to enable YGWT to meet all legal and statutory obligations
- to carry out comprehensive safeguarding procedures (including due diligence and complaints handling) in accordance with best safeguarding practice from time to time
- to fundraise and promote the work of YGWT
- to maintain accounts and records
- to process a donation that you have made (including Gift Aid information)
- to seek your views or comments
- to notify you of key developments to YGWT (including regarding events, changes to role holders and updates regarding the grant application process)
- to send you communications which you have requested and that may be of interest to you (which may include information about campaigns, appeals, other fundraising activities)
- to process a job application

YGWT maintains a database which contains a record of all the personal data currently processed by YGWT. The database is managed by the Operations Director and other employees, and reviewed on a regular basis to ensure that all processing is undertaken on a lawful basis and that the information remains accurate.

YGWT will comply with its legal obligations to keep personal data up to date; to store and destroy it securely; to not collect or retain excessive amounts of data; to keep personal data secure, and to protect personal data from loss, misuse, unauthorised access and disclosure and to ensure that appropriate technical measures are in place to protect personal data. In relation to the YGWT database, these operational and technical measures include the database being subject to IT security measures such as encryption and access controls. YGWT will report any personal data breach to the Information Commissioner's Office within 72 hours (and to affected individuals if there is a high risk).

6. Your rights as a data subject

Unless an exemption applies under the GDPR (such as where YGWT has a legal requirement to process the data) you have the following rights with respect to your personal data. This policy and the way that YGWT uses your personal data have been designed to uphold these rights:

- the right to be informed about the collection and the use of your personal data
- the right to access personal data (known as a subject access request) and request certain information in relation to its processing
- the right to have inaccurate personal data rectified, or completed if it is incomplete
- the right to erasure (to be forgotten) in certain circumstances



- the right to restrict processing in certain circumstances
- the right to data portability (which allows you to obtain and reuse your personal data for your own purposes across different services)
- the right to object to the processing of your personal data used for direct marketing purposes or where YGWT processes your personal information relying on legitimate interests
- rights in relation to automated decision making and profiling
- the right to withdraw your consent at any time (where relevant)
- the right to complain to the Information Commissioner

7. YGWT's legal basis for processing data

YGWT requires a legal basis for the collection and processing of your personal data. In each case, the applicable legal base may be that:

- YGWT has a legitimate interest in processing the data, which is not outweighed by your rights and interests (this is the most common basis on which we will process personal data)
- you have provided consent for YGWT to process your data
- it is necessary to implement a contract between you and YGWT
- YGWT must process the data to comply with a legal obligation
- processing the data is essential for protecting the vital interests of a person
- processing the data is essential for carrying out a task in the public interest

8. Sharing your information with third parties

YGWT will not transfer your personal data to any third party unless the transfer is (a) required by law; (b) consented to by you; or (c) a necessary part of the activities that YGWT undertakes (for example, we may transfer your name, address and the values of your gifts to HMRC in order to claim gift aid).

9. Transfer of data abroad

Any electronic personal data transferred to countries or territories outside the UK will only be placed on systems complying with measures giving equivalent protection of personal rights to the UK.

10. Record-keeping

YGWT will keep records only for as long as required (which may be permanently if YGWT is legally required to do). As such, YGWT will delete personal data when it is no longer needed. For example, it is best practice to keep financial records for a minimum period of 7 years to support HMRC audits.

11. Further contact

Please contact us if you have any questions about this policy or the personal data that YGWT holds about you or to exercise any relevant rights, to complain or to share any queries:

- by email at info@yarntontrust.org
- by post at Yarnton Gospel Workers Trust, 116-118 Walworth Road, London SE17 1JL

If you believe that YGWT has not complied with your data protection rights, you can complain to the Information Commissioner. You can contact the Information Commissioner's Office on 0303 123 1113. For more information, visit www.ico.org.uk.