

Upper Reaches Data Policy and Privacy Notice

1. **Your personal data – what is it?**
 - 1.1. Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (the "GDPR")
2. **Who are we?**
 - 2.1. Upper Reaches CIO ("Upper Reaches ") is the data controller (contact details below).
 - 2.2. This means the Trustees of Upper Reaches decide on the contents of this Policy
3. **Overarching principles**
 - 3.1. We will always respect the way you wish to hear from us and you can update that at any time by contacting us on info@upperreaches.org.uk
 - 3.2. We will always treat your data with the upmost respect and commit to storing your personal information securely
 - 3.3. We will never sell your information
 - 3.4. We will only share your information where you have asked us to do so or if we have explained why in this policy
4. **What personal data do we hold?**
 - 4.1. We hold contact details provided by you (e.g. name, mobile number, email address, home address)
 - 4.2. We hold details of the organisation which you work for where applicable
 - 4.3. We hold information provided by you so that we can pray specifically for you
 - 4.4. Where you use the Prayer Barge for an activity we may hold information provided by you about what you are planning to do
 - 4.5. Where you make a donation, we may hold information related to that either in bank or account records or for accounting purposes
5. **Why do we hold personal data?**
 - 5.1. We hold personal data for the purposes of contacting you as you request and for praying for you or where necessary for accounting or legal reasons
6. **How do we process personal data?**
 - 6.1. We use personal data to contact you, to pray for you us to do so and to process donations from you.
 - 6.2. In particular we use personal data to send out the MailChimp communications with updates about news, events and activities relating to the Prayer Barge on a weekly, monthly and more occasional basis.
 - 6.3. We use personal data to help manage our Trustees and volunteers
 - 6.4. We use personal data to maintain our own accounts and records (including processing donations)
 - 6.5. The legal basis for processing your personal data is explicit consent and/or legitimate interest
 - 6.6. Processing is carried out by a not-for-profit body with a political, philosophical, religious or trade union aim provided: the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes); and there is no disclosure to a third party without consent.
7. **Where does the personal data come from?**
 - 7.1. The personal data we use comes from you or from someone who you have asked to provide it to us (e.g. a colleague who asks you to provide us with contact details)
8. **How long do we plan to hold your personal data?**
 - 8.1. We plan to hold your personal data as long as you want us to or for as long as is necessary
 - 8.2. We will generally delete emails containing prayer requests within 2 weeks of receipt of those emails
 - 8.3. Specifically, we retain gift aid declarations and associated paperwork for up to 6 years after the calendar year or last calendar year to which they relate
9. **Who might we share personal data with?**
 - 9.1. We will only share your prayer requests with the Upper Reaches Prayer Team which is approved by the Trustees of Upper Reaches from time to time
 - 9.2. We may share financial information with our bookkeeper and auditors/independent examiners and HMRC

- 9.3. We may share your personal data with other contacts of Upper Reaches if you ask us to do so
- 9.4. We may have to disclose your personal data for example where we are under a duty to disclose it in order to comply with any legal obligations or for safeguarding purposes
- 9.5. We use MailChimp to send regular emails. MailChimp operates highly robust data security systems. By providing us with your details you are giving us express permission to transfer your data in order to use this service
- 9.6. We receive donations from providers of donation services such as Mydonate, Stewardship.Give.net and text giving BOAT07 who process donations from you but only where you have opted to use those services

10. How do we hold and secure your data?

- 10.1. Data is held either electronically or physically
- 10.2. Data is held on MailChimp for the purposes of our mailing lists
- 10.3. Other electronic communications using dedicated “upperreaches.org.uk” email addresses will be stored on a password protected electronic device in a named folder
- 10.4. Hard copy data will be held in a lockable container (e.g. information cards) wherever possible

11. Can I change my consent to the use of personal data?

- 11.1. If you want to update your personal data or change the way you wish to hear from us or withdraw your personal data, simply let us know by emailing info@upperreaches.org.uk or unsubscribing using the MailChimp option to do so

12. What are my other rights in respect of personal data

- 12.1. You have other rights under the General Data Protection Regulations (which are summarised below in paragraph 14) and we will comply with our obligations under those regulations and other applicable laws
- 12.2. If you would like further information about your rights, then we suggest you start by contacting the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

13. Who is responsible for this policy and its review?

- 13.1. Ultimately, responsibility lies with Upper Reaches, but our data protection lead can be contacted on victor.tettmar@upperreaches.org.uk
- 13.2. This policy was created in May 2018 and will be reviewed annually.

14. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data

- 14.1. The right to request a copy of your personal data which we hold about you;
- 14.2. The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- 14.3. The right to request your personal data is erased where it is no longer necessary for us to retain such data;
- 14.4. The right to withdraw your consent to the processing at any time
- 14.5. The right to request that the data controller provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable) [Only applies where the processing is based on consent or is necessary for the performance of a contract with the data subject and in either case the data controller processes the data by automated means].
- 14.6. The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- 14.7. The right to object to the processing of personal data, (where applicable) [Only applies where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics]
- 14.8. The right to lodge a complaint with the Information Commissioners Office.