



## DATA PRIVACY NOTICE

### Introduction

This Data Privacy Notice provides information about how Refresh Church Trust ("We" "Us" "Refresh") gathers and uses personal data. We are committed to respecting the confidentiality of the personal data you supply to us and to storing and processing the data in accordance with data privacy laws.

You have the right to be provided with clear, transparent and easily understandable information about how we use your personal data and your rights. This is why we are providing you with the information in this Data Privacy Notice.

The rules on processing of personal data are set out in the [General Data Protection Regulation](#) (the "GDPR").

### 1. Definitions

- **Data controller:** A controller determines the purposes and means of processing personal data.
- **Data processor:** A processor is responsible for processing personal data on behalf of a controller.
- **Data subject:** Natural person.
- **Categories of data:**
  - **Personal data** – The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example name, National Insurance number, home address or private email address. Online identifiers include IP addresses and cookies.
  - **Special categories of personal data** – The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

- **Processing:** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- **Third party:** means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

## 2. About us

We are Refresh Church Trust (charity number 1139476; company number 7455600) and for the purposes of data privacy legislation, we are the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are:

Refresh Church Trust  
129 Walton Road  
East Molesey  
Surrey  
KT8 0DT

Tel: 020 8979 1452

Email: [churchoffice@refreshchurch.org.uk](mailto:churchoffice@refreshchurch.org.uk)

For all data matters, please contact our Data Representative on 020 8979 1452 or via [churchoffice@refreshchurch.org.uk](mailto:churchoffice@refreshchurch.org.uk).

## 3. Our purposes for collecting and using your personal data

We use your personal data to:

- Keep you informed of Refresh news, activities and events
- Enable Refresh church members to communicate with each other
- Ensure the smooth running of Refresh courses, sports teams and events
- Reimburse expenses
- Fulfil legal obligations regarding Gift Aid, payroll processing, safeguarding events, trustee roles

## 4. The category of data we hold and how we have obtained it

With reference to the categories of data described in the definitions section, we hold 'Personal data' which may include: your name, address, email address, telephone number, date of birth, dietary requirements, bank details, DBS status.

We have obtained your personal data from you yourself or, in the case of children or vulnerable adults, from your parent or guardian.

## 5. Our legal basis for processing your personal data

Our legal basis for processing your personal data is twofold:

- To comply with a legal obligation – this relates specifically to Gift Aid declarations, payroll processing, safeguarding events, trustee roles
- Legitimate interests – this means that we use your personal data in ways that you would reasonably expect and that have a minimal privacy impact. This includes:
  - Keeping Refresh church members and members of the public who have expressed interest in Refresh activities informed of Refresh news, activities and events
  - Enabling Refresh church members to communicate with each other
  - Ensuring the smooth running of Refresh courses, sports teams and events
  - Reimbursing expenses

More information on lawful processing can be found on the Information Commissioner's Office (ICO) [website](#).

## 6. Sharing your personal data

Your personal data will be treated as strictly confidential, and will not be shared with anyone or any organisation outside of Refresh except for:

- HMRC for Gift Aid declarations
- Third-party payroll processing and pension administration organisations (for RCT employees)
- Relevant safeguarding agency for a safeguarding incident
- Charity Commission and Companies House for trustee information
- Independent Examiners Limited for year-end accounts examination

We may share your personal information with other third parties, for example a regulator, or to otherwise comply with the law.

## 7. How long do we keep your personal data?

We keep your personal data only for as long as necessary depending on the purpose for which it was provided. When determining the relevant retention periods, we will take into account factors including:

- The nature of our relationship with you (eg: long-term, short-term)
- Legal obligations under applicable law to retain data for a certain period of time
- (Potential) disputes
- Guidelines issued by relevant supervisory authorities (eg: safeguarding)

## 8. Providing us with your personal data

Unless you are an employee or trustee of Refresh, you are under no statutory or contractual requirement or obligation to provide us with your personal data. However, if you choose not to do so, we will be unable to communicate Refresh news and information to you.

## 9. Your rights

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

- The right to be informed about how we collect and use your personal data
- The right to request a copy of the personal data which we hold about you
- The right to request that we correct any personal data if it is found to be inaccurate or out of date
- The right to request your personal data is erased where it is no longer necessary to retain such data
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request that we place a restriction on further processing
- The right to object to the processing of personal data where we are relying on a legitimate interests and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object to the use of your data for direct marketing purposes

## 10. Transfer of data abroad

We do not transfer personal data outside the European Economic Area.

## 11. Automated decision-making

We do not use any form of automated decision-making in our activities.

## 12. Our e-newsletter and website

We use a third-party provider to deliver our e-newsletters. We use industry standard technologies to gather statistics around email opening and clicks to help us monitor and improve our e-newsletter.

We do not use cookies on the Refresh website. We use third party technology, such as Google Analytics, to provide us with information about how you use our website. We may use this information to compile statistics and to help us to improve our website and the information we make available. Google's privacy policy is available at <https://policies.google.com/privacy/update>.

## 13. Links to other websites

Links on the Refresh website may take you to third-party sites over which we have no control. While such links are provided for your convenience, you should be aware that the information-handling practices of the linked websites might not be the same as ours. You should review any privacy notices on those linked websites. We are not responsible for any linked websites.

## 14. Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on our website and, where appropriate, notified to you by email.

## 15. How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact our Data Representative via email: [churchoffice@refreshchurch.org.uk](mailto:churchoffice@refreshchurch.org.uk).

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioner's Office](https://ico.org.uk/global/contact-us/email/) (ICO) on 030 3123 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, England.