

# CROSSROADS PRIVACY POLICY

## Our Commitment to Privacy

Your privacy is a top priority for us.

When dealing with your personal data, we as a church are required to observe our obligations under The General Data Protection Regulation (**GDPR**) (Regulation (EU) 2016/679).

This policy sets out how we will collect, use, store, disclose and anonymize your personal data.

### COLLECTION OF INFORMATION

We collect and retain personal data when necessary for the purposes of the ministry and related activities of Crossroads International Church. No one is under any compulsion to give us any personal data unless they wish to. The Church may collect general data about you such as your name, address and other details so that we can contact you. We may also collect personal data during the course of dealing with you, for example when you wish to obtain goods or services from the Church, when you register for conferences or events and when you participate in Church activities or complete other forms. Where practicable, the purpose for which we collect personal data will be made clear at the time of collection. While not providing the Church your personal data will have no influence on the way the Church deals with you, if you do not provide us with certain information we may be unable to provide you with access to some of our services or the assistance you have requested.

## **1. DEFINITION OF PERSONAL DATA AND THE TYPES OF DATA WE COLLECT**

Personal data means any information relating to an identified or identifiable living individual. The types of personal data we may collect can include:

- a. Regular personal data, such as;
  - contact details (name, address, telephone numbers, email, gender, date of birth, marital status, nationality);
  - complaint details;
  - donation history for administrative purposes; and
  - credit card and/or bank account details (only for the purpose of processing payments e.g. membership/donations by direct debit).
- b. Sensitive data, including;
  - health information (only if you have provided us with this information or if it is strictly required for your safe participation in a church activity, such as information regarding a food allergies);
  - religious data (including attendance, denominational details, involvement in church, roles in church, baptism dates, etc.); and
  - photograph (only with your explicit consent).

## **2. THE DATA CONTROLLER**

Crossroads International Church is the data controller. Being a data controller means that, Crossroads International Church determines the means, and the purposes for which, any personal data are processed (for our contact details please see paragraph 14 below).

## **3. THE LEGAL BASIS FOR PROCESSING PERSONAL DATA**

The legal basis for Crossroads International Church to process your personal data is:

- Explicit consent by you (via our Consent Form, attached to this policy). By giving your consent we can keep you informed about news, events, activities and services;
- Processing of your data for religious purposes (this data will not be disclosed to a third party);
- If the Church has a legitimate interest in processing your personal data;
- If there is a legal obligation for the Church to process your personal data;

- To provide our Church members with a service; or
- If the processing is strictly necessary in order to protect your vital interests.

#### **4. THE PURPOSE OF THE DATA PROCESSING**

We use data only for the purposes we have disclosed at the time of collection, or otherwise as set out in this Privacy Policy. We will not use or disclose your personal data for any other purpose without informing, unless authorised or required by law. We will not share any sensitive data provided to us with any third party without your explicit prior approval (or your legal guardian).

Generally, we will only use and disclose your personal data as follows:

1. to establish and maintain a record of your involvement and attendance;
2. to keep you informed about upcoming events and events for your children;
3. to answer your inquiry;
4. to register you for events, camps or retreats;
5. to keep you informed of new developments we believe may be of interest to you (if we contact you in this way, you will have the opportunity to decline any further such communications); [and]
6. to provide the products or services you have requested from the Church; and
7. process donations that you have made

#### **5. SHARING YOUR DATA WITH THIRD PARTIES**

In principle, we do not share your data with third parties. In certain limited cases, it may be that we grant a third-party access to our IT-system e.g. for regular maintenance. In such a case, the Church will ensure that these third-parties are bound to confidentiality and the same level of data protection as is provided under this policy. These third parties can only provide their services under supervision and instructions of the Church. Furthermore, your personal data may be shared with a third party if we are legally required to do so.

#### **6. HOW WE COLLECT YOUR DATA**

We may collect information from you either directly or from third parties. Information we collect from third parties may be by formal or informal means.

We collect personal data about supporters, donors, volunteers, employees, contractors and visitors to our events. We collect your data in the following ways:

- information provided on our Consent Form;

- face to face contact;
- electronically including information that you have voluntarily given on our website and (online) surveys;
- during phone calls;
- whilst delivering and administering services at our facilities or other facilities; and from forms and other correspondence (both in writing and electronically).

## **7. ACCESSING AND CORRECTING YOUR PERSONAL DATA**

You can always access or view your data by asking us. You may also request that we correct your personal data or delete it.

When you request access, we will ask you to provide some form of identification so that we can ensure that you are the person to whom the data relates.

If you have a question about this privacy policy or want to access your personal data you can contact us by email at: [privacyofficer@xrds.nl](mailto:privacyofficer@xrds.nl)

We will aim to respond to you within 28 days of receiving your request.

If we're not able to help with your request, you will receive a written explanation as to why.

## **8. HOW LONG WE RETAIN YOUR PERSONAL DATA**

The Church will only retain data as long as it is necessary to serve the purpose for which the data was initially obtained or for as long as needed to meet legal obligations to retain certain data.

## **9. COMPLAINTS ABOUT A BREACH OF YOUR PRIVACY**

If you are concerned about how we have collected or managed your personal data we request you follow the procedure set out below.

1. Contact us by email at [privacyofficer@xrds.nl](mailto:privacyofficer@xrds.nl)
2. Complete the Complaints Form (available via request at [info@xrds.nl](mailto:info@xrds.nl))
3. Submit your completed Complaints Form to [privacyofficer@xrds.nl](mailto:privacyofficer@xrds.nl). In order to effectively address your complaint, we may request further information from you about your complaint and the reasons behind it.
4. After we receive all the information we need from you, allow us approximately 28 days to address your complaint.

## **10. DISCLOSING YOUR PERSONAL DATA OVERSEAS**

We use facilities or contractors outside the European Economic Area (**EEA**) to process or back-up data or to provide other services. As a result, we may disclose your personal data to our non-EEA facilities or contractors for these purposes. Any disclosure of your personal data in this respect, does not change our commitment to safeguarding your privacy. We do not otherwise disclose or transfer your personal data outside the EEA. Countries in which we store data either directly or with third parties, as previously described, include the United States of America.

If we transfer your data outside of the EEA, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring an adequate level of data protection or, if necessary, a comparable adequate mechanism in place (e.g. model clauses, Privacy Shield certified, etc.). All, in order to continue to protect your privacy as outlined in this policy.

Such partners currently include (online) software or application providers.

- Planning Center Online
- MailChimp
- Eventbrite
- Microsoft Office 365

## **11. SECURING YOUR DATA**

We take reasonable steps to ensure the security of personal and sensitive data we hold and to protect it against loss, misuse or unauthorised access, destruction, use, modification or disclosure.

Our IT systems are password protected and comply with applicable security standards. Only authorised personnel are permitted to access these details.

It is our policy to:

- permanently de-identify personal data where reasonable and possible; and
- destroy personal data once there is no longer a legal or business need for us to retain it.

## **12. ANONYMITY**

One of your data protection rights, includes your right to be dealt with anonymously, provided that is it lawful and practicable.

We will try to accommodate a request for anonymity wherever possible, however we note that in some circumstances, this may prevent us from practically and effectively communicating with you.

If this is the case, we will notify you.

### **13. COOKIES AND LINKS TO OTHER WEBSITES**

Currently our website does not use cookies but in the future, we might use this to compile statistical information about the use of our website. It is not used for other purposes. If you do not want ‘cookies’ to be used please adjust your browser settings to disable them.

When you visit the website a record of your visit is logged. The following data is supplied by your browser:

- Your IP address and/or domain name;
- Your operating system (type of browser and platform);
- The date, time and length of your visit to the website; and
- The resources you accessed and the documents you downloaded.

#### ***Links to other websites***

Our website may contain links to third-party websites, and third-party websites may also have links to our website.

Our privacy policy does not apply to external links or other websites. The operators of other websites may collect your personal data.

We encourage you to read the privacy policies of any website you link to from our website.

### **14. CONTACT DETAILS**

To exercise all relevant rights, queries of complaints please in the first instance contact: Privacy Officer at [privacyofficer@xrds.nl](mailto:privacyofficer@xrds.nl).

For general data, please contact the office on 020 5451444, or via email [info@xrds.nl](mailto:info@xrds.nl) or at Bovenkerkerweg 49, 1185XA, Amstelveen.