

## GREAT LAKES OUTREACH PRIVACY NOTICE

Great Lakes Outreach is committed to protecting and respecting your privacy.

Your privacy is very important to us, which is why we make sure you are always in control of what we do with your personal information.

The purpose of this notice is to tell you what information we collect from you, how and when it may be collected and what happens to it. For the purpose of this notice “we”, “our” and “us” refers to Great Lakes Outreach (“the Charity”)

The Charity is a data controller and can be contacted using the contact details as set out in the Contact us section of this Privacy Notice. This means that we make decisions about how and why we use your Personal Data, as defined below, and, because of this, we are responsible for making sure it is used in accordance with applicable data protection laws.

This notice only applies to personal information processed by or on behalf of the Charity.

### Contact us

You can contact us by emailing: [info@greatlakesoutreach.org](mailto:info@greatlakesoutreach.org)

Our address is:

1<sup>st</sup> Floor, Tower House, Latimer Park, Chesham, HP5 1TU, United Kingdom

Telephone: +44 (0)1494 766731

registered Charity number: 1097267

registered company number: 4686283

If you have a specific question about this notice or how we use your Personal Data, you should contact us via the postal or email address set out above; please mark your communication as “Data Protection Enquiry”

### 1. Definitions

In this notice the following words will have the following meanings:

<b>Data Protection Laws</b>	means any applicable law relating to the processing, privacy, and use of Personal Data, including (a) in the United Kingdom, (i) the Privacy and Electronic Communications (EC Directive) Regulations 2003, SI 2003/2426, and any laws or regulations implementing Directive 2002/58/EC (ePrivacy Directive); and/or (ii) the General Data Protection Regulation (EU) 2016/679 (GDPR), Data Protection Act 2018 and/or any corresponding or equivalent national laws or regulations (b) in member states of the European Union, the GDPR and the ePrivacy Directive, and all relevant member state laws or regulations giving effect to or corresponding with any of them; and (c) any judicial or administrative interpretation of any of the above, any guidance, guidelines, codes of practice, approved codes of conduct or approved certification mechanisms issued by any relevant supervisory authority;
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## **Personal Data**

means any information relating to an identified or identifiable natural person ("Data Subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person and where referred to in this notice includes special categories of personal data.

## **2. Information we collect from you**

2.1. We will collect and process the following Personal Data about you:

2.1.1. **Personal Data you give us.** This is information about you that you give us by contacting us via our website at [www.greatlakesoutreach.org](http://www.greatlakesoutreach.org) ("our site") or by corresponding with us by telephone, e-mail or otherwise. The information you give us may include your name, address, your role and place of employment, country of residence, e-mail address and phone number and payment method information, including account name and number.

2.1.2. **Personal Data we collect about you.** With regard to your visits to our site we may collect the following information:

2.1.2.1 personal and contact details you give us when subscribing to receive marketing information from us (for example name, role and email address), to order any books available on our site, or interact with our online challenge via our Choose Life website, <http://www.chooselife.org.uk/about>;

2.1.2.2 technical information, browser type and version, time zone setting, and operating system and platform. Any personally identifiable information collected is not shared with the Charity;

2.1.2.3 information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), page response times, download errors and length of visits to certain pages. Any personally identifiable information collected is not shared with the Charity;

2.1.2.4 information from social media activity (such as likes, shares and tweet) when you interact with us on social media;

2.1.2.5 information you provide if you report a problem with our website or service.

## **3. Cookies**

A cookie is a small amount of data, which often includes a unique identifier that is sent to your computer or mobile phone browser from a website's computer and is stored on your computer's or mobile phone's hard drive. Each website can send its own cookie to your browser if your browser's preferences allow it, which the site can then access when you visit it again to track online traffic flows, for example. A website cannot access cookies sent by other websites.

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our [Cookies Policy](#).

#### **4. Uses made of the Personal Data**

4.1. We will only use your Personal Data to the extent that the law allows us to do so. Under the Data Protection Laws we will rely on the following legal bases for processing your Personal Data:

- 4.1.1. where you have given us your consent;
- 4.1.2. where it is necessary for the purposes of our legitimate interests (or those of a third party) and your interests or fundamental rights and freedoms do not override those interests;
- 4.1.3. as necessary to comply with a legal obligation: for example when you exercise your rights under data protection laws and make requests, for establishment and defence of legal rights or obligations, such as in dealing with any complaint from you;
- 4.1.4. as necessary to perform our contract with you, for example in fulfilling a book order, to manage and perform that contract and to update our records.

4.2. **Personal Data you give to us.** We may use this information:

- 4.2.1. to record and process donations, to invite you to fundraising events that we organise, or are organised on our behalf, to send you our prayer news, information on our appeals and updates as to how your donations have been utilised and their impact, as well as to process an enquiry received from you;
- 4.2.2. to ensure that content from our site is presented in the most effective manner for you and for your computer;
- 4.2.3. if applicable, processing your application for employment and we shall retain a copy of your CV in case of future suitable opportunities.

4.3. **Personal Data we collect about you.** We may use this information:

- 4.3.1. to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- 4.3.2. to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- 4.3.3. to allow you to participate in interactive features of our service, when you choose to do so;
- 4.3.4. as part of our efforts to keep our site safe and secure;

#### **5. Disclosure of your Personal Data**

- 5.1. We may use third party service providers to support the Charity in achieving its charitable objectives. This could include cloud storage providers, including (without limitation) IT support, hosting our data on cloud platforms, (for example with Beacon Apps Ltd), legal, accounting, audit, consulting, together with online fund raising platforms, such as Charity Checkout and Justgiving, as well as other professional service providers with whom we have a contractual relationship with. Portions of our services may be provided by interns, social media consultants and mailing houses. We will ensure that we have a data processing agreement in place with these service providers prior to disclosure of your Personal Data to them. We only provide these organisations with the information that they need to be able to perform their services.
- 5.2. You agree that we have the right, should we require it, to share your Personal Data with analytics and search engine providers that assist us in the improvement and optimisation of our site.
- 5.3. We may disclose your Personal Data to third parties if we are under a duty to disclose or share your Personal Data in order to comply with any legal obligation, or in order to enforce or apply our standard terms and conditions of business and other agreements; or to protect the rights, property, or safety of the Charity. This includes exchanging information with other companies and organisations for the purposes of fraud protection.

## **6. Sensitive Information**

We may need to collect your health information in order to meet our legal requirements in relation to vulnerable persons.

We may require you to supply us with details of your dietary requirements, where necessary, if attending one of our fundraising events. This information will be shared with the host of an event or the hotel where the event is being held. We do not collect this information every time a user uses the site. However, we do store the information in a database if the user provides it, for example during registration or booking an event.

We may collect details of your religious beliefs and health information as part of our work in achieving our charitable objectives.

We may collect other sensitive information if it is provided to us by you or on your behalf voluntarily. By giving us this information, you agree that we may use such information as set out in this notice.

## **7. Children's Data**

- 7.1. We recognise any individual under the age of 18 years old as being a child. We take safeguarding of children (including the protection of their personal data) seriously and will take all reasonable steps to ensure that children are provided with sufficiently clear information on how we will collect, process and store their personal data, and that children and their guardians understand the nature of the processing of their personal data together with their rights in respect of the same
- 7.2. Children below the age of 13 years old will always require the consent of an adult with parental responsibility to provide personal data to, and consent to the processing of that data with us.
- 7.3. Children between the ages of 13 years old and 18 years old may be able to provide consent in their own right to the processing of their personal data depending on their maturity and

ability to understand the nature of the processing of that data. We will take reasonable steps to assess a child's maturity and ability to understand the nature of data processing before determining whether a child can reasonably consent to processing in their own right. Further information on how we will assess a child's ability to consent in their own right can be supplied on request via our contact details above.

## **8. Photographs and filming**

There is often filming and photography taking place at events, during our fund raising activities and as part of capturing our charitable activities in line with our charitable objectives. Films and photographs will be used on our promotional material (such as on our site). Personal devices may be used to film and take these photographs. If you do not wish to be filmed, or have your picture taken, please make this known prior to such filming or taking photographs.

## **9. Where we store your Personal Data**

- 9.1. All Personal Data you provide to us, and that which we disclose to third parties as listed in section 5 above, is stored on cloud based solutions.
- 9.2. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your Personal Data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your Personal Data, we will use strict procedures and security features to try to prevent unauthorised access.

## **10. Direct Marketing**

We use Personal Data about you for the purposes as outlined in section 4 above. You authorise us to use any email address, or other contact information you provide, at any time for such purposes.

You can opt out of receiving electronic communications at any time. If you wish to do so, please follow the 'unsubscribe' link provided in the electronic communication that you have received or contact us using the details in section 13 below.

## **11. International Transfer**

11.1 If we transfer your Personal Data outside the European Union, we will only make that transfer if:

- 11.1.1. that country ensures an adequate level of protection for your Personal Data;
- 11.1.2. the recipient or recipient country is subject to an approved certification mechanism or code of conduct with binding and enforceable commitments which amount to appropriate safeguards for your Personal Data – this includes for example, the EU-US Privacy Shield which enables the secure transfer of personal data to the United States;
- 11.1.3. we have put in place appropriate safeguards to protect your Personal Data, such as a contract with the person or entity receiving your Personal Data which incorporates specific provisions as directed by the European Commission;

11.1.4. the transfer is permitted by applicable laws; or

11.1.5. you explicitly consent to the transfer.

11.2 We have not set out the specific circumstances when each of these protection measures are used. You can contact us at the contact details above for the details as to how we protect the specific transfer of your Personal Data.

## **12. Retention of Personal Data**

12.1. We will only retain your Personal Data for as long as necessary to fulfil the purposes for which we collected your Personal Data.

12.2. To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of that Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

## **13. Control of and access to your Personal Data**

You may withdraw your consent to receiving marketing at any time by emailing [info@greatlakesoutreach.org](mailto:info@greatlakesoutreach.org)

We also offer the following controls:

13.1.1. you may request access to or copies of the Personal Data that we hold about you. If you would like to exercise this right, please correspond with us in accordance with the details set out in the Contact us section above;

13.1.2. if you believe that any Personal Data we have about you is incorrect or incomplete, please correspond with us in accordance with the details set out in the Contact us section above as soon as possible. We will take steps to seek to correct or update any information if we are satisfied that the Personal Data we hold is inaccurate. You may request that we restrict our processing;

13.1.3. you may request that your Personal Data be deleted where it is no longer necessary for the purposes for which it is being processed and provided there is no lawful basis for which we may continue to process such information;

13.1.4. if we are processing your Personal Data to meet our legitimate interests (as set out above), you may object to the processing of your personal information by us. If we are unable to demonstrate our legitimate grounds for that processing, we will no longer process your personal information for those purposes;

13.1.5. if you have objected to our processing as set out above;

13.1.6. you may withdraw any consent given to processing (this will not affect the lawfulness of processing based on consent before its withdrawal); or

13.1.7. if we are processing your Personal Data automatically for the purposes of performing our contract with you, you may have the right to request that the Personal Data we hold about you be transferred to a third party data controller.

You may also request that we restrict the processing of your Personal Data to that to which you have consented to, for the establishment, exercise or defence of legal claims or the

protection of the rights of another person, whilst we verify your Personal Data as set out in point 13.1.2 above, or pending verification of our legitimate grounds as set out in point 13.1.4 above.

Please contact us if you would like to exercise any of these rights or if you have any concern about how your Personal Data is processed via the contact details as set out in the Contact us section above and we will try to resolve your concerns. However, if you consider that we are in breach of our obligations under data protection laws, you may lodge a complaint with the Information Commissioner's Office (<https://ico.org.uk/global/contact-us/>). You have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or of an alleged infringement of the GDPR.

#### **14. Changes to our privacy notice**

Any changes we make to our privacy notice in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy notice.