**EOT Privacy Policy**

Version: 2018-08-17

Document owner - Mark Jordan – Data Protection Manager

*This Policy is our public policy that should be emailed to people and displayed on our website. When that is done then these two lines do not need to be included.*

**Preamble**

This is the Privacy Policy of the European Outreach Trust (EOT). For the purposes of this policy EOT includes ‘Sword of the Spirit’ and ‘Kairos Europe and the Middle East’. In this policy “we”, “our” or “us” refers to the European Outreach Trust and where the context allows ‘Sword of the Spirit’ and ‘Kairos Europe and the Middle East’. We are a registered charity in England and Wales, no. 278068. Our principal office is

31 Lynton Road

Acton

London

W3 9HL

EOT operates primarily across Europe and the Middle East. We have 3 departments. An International department, a European and Middle Eastern department and one department dedicated just to Europe. We have staff in Europe, the Middle East, the USA, Philippines and Latin America.

We work with local communities in over 15 countries with around 200 volunteers who work with us each year. We act as the umbrella body for a number of member groups who exist as separate legal entities across the world (these groups may also be referred to as Host Legal Entities). We have websites published at

[www.swordofthespirit.net](http://www.swordofthespirit.net)

[www.kairos-eme.org](http://www.kairos-eme.org)

[www.sos-eme.com](http://www.sos-eme.com)

[www.thelovelycommission.org](http://www.thelovelycommission.org)

<https://www.facebook.com/KairosEuropeAndTheMiddleEast>

We may also from time to time set up other websites that promote specific events.

We email out information to our mailing lists:

* Living Bulwark newsletter
* Daily scripture meditations
* Kairos alumni
* Regional Community Membership lists
* SOS Leaders Updates
* The Lovely Commission

This Policy is effective from 24th May 2018.

1. **Introduction**

This notice is to inform you of our policy about all information that we record about you. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers information that could identify you (“personal information”) and information that could not. In the context of the law and this policy, “process” means collect, store, transfer, use or otherwise act on information.

We take seriously the protection of your privacy and confidentiality. We understand that all visitors to our websites, attendees at our events, members, and subscribers to our mailing lists are entitled to know that their personal data will not be used for any purpose unintended by them and will not accidentally fall into the hands of a third party.

We undertake to preserve the confidentiality of all information you provide to us.

Our policy complies with UK law accordingly implemented, including that required by the EU General Data Protection Regulation (GDPR).

The law requires us to tell you about your rights and our obligations to you in regard to the processing and control of your personal data.

Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website.

1. **The bases on which we process information about you**

The law requires us to determine under which of six defined bases we process different categories of your personal information, and to notify you of the basis for each category. If a basis on which we process your personal information is no longer relevant then we shall stop processing your data. If the basis changes then if required by law we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

1. **Information we process because we have a contractual obligation with you**

With some agreements a contract may be formed between you and us. In order to carry out our obligations under that contract we must process the information you give us. Some of this information may be personal information.

We may use it in order to:

* provide you with our services
* provide you with suggestions and advice on services we offer

We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract. Additionally, we may aggregate this information in a general way and use it to provide class information, for example to monitor our performance with respect to a particular service we provide. If we use it for this purpose, you as an individual will not be personally identifiable. We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

1. **Information we process with your consent**

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website, sign up for a mailing list or ask us to provide you more information about our work, including job opportunities and our products and services, or when we ask you if we can contact you, you provide your consent to us to process information that may be personal information.

Wherever possible, we aim to obtain your explicit consent to process this information, for example, by asking you to agree to our use of cookies, or agreeing that we can add you to our fundraising mailing lists.

Sometimes you might give your consent implicitly, such as when you send us a message by e-mail to which you would reasonably expect us to reply.

Except where you have consented to our use of your information for a specific purpose, we do not use ‘consent’ as the basis on which to process your information in any way that would identify you personally. We may aggregate it in a general way and use it to provide class information, for example to monitor the performance of a particular page on our website.

We continue to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us at DPM@swordofthespirit.net. However, if you do so, you may not be able to use our website or our services further.

1. **Information we process as a legitimate interest**

The work of EOT is intended to further the mission of the Sword of the Spirit and Kairos. As such we, or one of our member groups, may collect information in order to provide you with a service such as running an event for you. In this case it is in our legitimate interests to collect and process some personal information so that we can continue to provide our services. We only process personal information which is necessary to further our legitimate interests whereby our genuine and legitimate reason is to help you to attend an event or a related activity and we are not harming any of your rights or interests.

As a non-profit organisation with a religious aim, we can process personal data of our members, former members and persons who have regular contact with us in connection with our purposes, as long as we have appropriate safeguards and the personal data is not disclosed outside of us without the consent of the data subjects.

1. **Information we process because we have a legal obligation**

We are subject to the law like everyone else. Sometimes, we must process your information in order to comply with a statutory obligation. For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order. This may include your personal information.

1. **Information collection and usage**
2. **Information provided for events on the understanding that it will be shared with Host Legal Entities (HLEs)**

For some events, information that you share with us will need to be shared with one or more of our member groups/HLEs. An HLE is a legal entity that manages an event on our behalf. We will only share the information that is necessary for the safe and effective running of the event that you are signing up for.

1. The following people will use your information for risk management, practical and pastoral purposes:
	1. Event Director or Manager
	2. Administrator and Insurance Officer of the host legal entity
	3. Person pastorally responsible for you during the programme
2. **How and what information do we collect?**

We use different methods to collect data from and about you. You may give us your Identity, and Contact information by filling in forms or by corresponding with us by post, phone, email or face-to-face. This includes personal data you provide when you:

1. Buy or express an interest in our products or services, on our website or via the telephone;
2. Subscribe to our newsletter or similar publications;
3. Request that we send promotional materials to you by submitting your email address or telephone number face-to-face or on social media sites;
4. Complete a registration form and opt in to receive promotional materials;
5. Take part in an event;

We collect several different types of information for various purposes to provide and improve our Service to you.

1. **We may collect the following information:**
2. The following information is within our legitimate interests to collect and is necessary for the safe and effective running of each programme and will be deleted within 3 months of the programme ending:
	1. Your church affiliation
	2. Your medical condition and any medication you are using
	3. Your dietary needs
	4. The name and contact information for your emergency contact
	5. Qualifications, achievements and personal goals
	6. All information from references
	7. Personal spiritual journey
	8. Criminal convictions
3. Additional information that is within our legitimate interests to collect and is needed for the safe and effective running of a longer-term programme. It will be deleted within 3 months of the programme ending:
	1. Nationality and visa status
	2. Experience
		1. Employment status and experience
		2. International travel experience
		3. Service and team experience in your local situation
		4. Specific skills experience
		5. Study experience
		6. Spiritual experience and journey
	3. Hobbies
	4. Motivation, hopes, fears desires and expectations for the trip/year
	5. Personal strengths, challenges
	6. Fundraisings ideas for the trip/year
	7. Previous/current drug dependency, typical weekly alcohol consumption
	8. Personal goals, achievements and lessons learned
	9. Preferences on the type of work you would do, how you think about the work and how you relax outside of work
4. When you sign up for an event we will ask your consent to store the following information so that we can contact you about future events:
5. Your name
6. Your date of birth
7. Your email address, phone number and address
8. Your sex
9. The group you attended this programme with
10. What programme you attended
11. Specific skills that impact future programmes
12. Languages you understand
13. **Information relating to your method of payment**

Payment information (including recurring payments, for example regular donations) is never taken by us or transferred to us either through our website or otherwise. Our employees and contractors never have access to it. At the point of payment, you are transferred to a secure page on the website of PayPal. That page may be branded to look like a page on our website, but it is not controlled by us.

1. **Job application and employment**

If you send us information in connection with a job application, we may keep it for up to three years in case we decide to contact you at a later date. If we employ you, we collect information about you and your work from time to time throughout the period of your employment. This information will be used only for purposes directly relevant to your employment. After your employment has ended, we will keep your file for seven years before destroying or deleting it.

1. **Sending a message to us**

When you contact us, whether by telephone, through our website or by e-mail, we collect the data you have given to us in order to reply with the information you need. We record your request and our reply in order to increase the efficiency of our operations. We keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high quality service.

1. **Use of information we collect through automated systems when you visit our website**
	1. **Use of Cookies**

Cookies are small text files that are placed on your computer by websites that you visit. To learn more about cookies, you can visit www.aboutcookies.org. You will also find details on how to block and delete cookies from your computer as well as more general information about cookies. For information on how to do this on the browser of your mobile phone you will need to refer to your handset manual.

Our websites listed in the preamble use cookies. They are placed by software that operates on our servers, and by software operated by third parties whose services we use.

When you first visit our website, we ask you whether you wish us to use cookies. If you choose not to accept them, we shall not use them for your visit except to record that you have not consented to their use for any other purpose.

* 1. **The Cookies We Use**

Google Analytics – These cookies collect information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don’t collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous.

This data helps us to understand:

* Which pages people visit on the site
* Which internet browsers are being used
* What is popular on the site
* Which interactive tools are used by visitors

You can find out more about Google’s cookies on their privacy policy: <http://www.google.com/intl/en/policies/privacy/> . You can also install the Google Analytics Opt-out tools in your browser: <https://tools.google.com/dlpage/gaoptout>

* 1. **YouTube & Vimeo**

If you play an embedded video on one of our sites, there may a cookie set by YouTube or Vimeo containing anonymous, non personally-identifiable information about the number of playbacks of embedded videos. To find out more please visit YouTube’s embedding videos information page. You can find out more on the Google Privacy Policy (Google owns YouTube):http://www.google.com/intl/en/policies/privacy/ and the Vimeo Privacy Policy: <http://vimeo.com/privacy>

**d. Sharing Tools**

If you use one of the ‘Share’ buttons on one of our website, an anonymous cookie may be set by addthis.com to help you to easily bookmark/share selected pages through a number of popular social networks. They also help us know what pages are being bookmarked/shared. You can find out more on the AddThis Privacy Policy: <http://www.addthis.com/privacy>. If you ‘Like’ or ‘Tweet’ using these services, third party websites may set a cookie when you are also logged in to their service (like Facebook or Twitter). We do not control these cookies and you should check the relevant third party website for more information about these cookies.

1. **Personal identifiers from your browsing activity**

Requests by your web browser to our servers for web pages and other content on our website are recorded. We record information such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution. We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you. If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally.

1. **Data may be processed outside the European Union**

We have staff in countries outside the European Union who run aspects of our operations. Accordingly, data obtained within the European Union or any other country could be processed outside the European Union.

We use the following safeguards with respect to data transferred outside the European Union:

* the processor (our staff member) is within the same group as our organisation and abides by the same binding rules listed in this policy regarding data processing.
1. **Retention period for personal data**

Except as otherwise mentioned in this privacy policy, we keep your personal information only for as long as required by us:

* to provide you with the services you have requested;
* to comply with other law, including for the period demanded by our tax authorities;
* to support a claim or defence in court.
1. **Access to your own information**
2. **Access to your personal information – Subject Access Request**

At any time you may review or update personally identifiable information that we hold about you. To obtain a copy of any information you may send us a request at DPM@swordofthespirit.net.

After receiving the request, we will provide you with the information within one month. If we will not be able to provide you with this information within one month we will contact you to explain when we will be able to provide it. There may be a fee for this service.

1. **Removal of your information**

If you wish us to remove personally identifiable information that we have saved about you, you may contact us at DPM@swordofthespirit.net. This may limit the service we can provide to you.

1. **Verification of your identity**

When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

1. **Other matters**

**Encryption of data sent between us**

We use Secure Sockets Layer (SSL) certificates to verify our identity to your browser and to encrypt any data you give us. Whenever information is transferred between us, you can check that it is done so using SSL by looking for a closed padlock symbol or other trust mark in your browser’s URL bar or toolbar.

**Website links**

We are not responsible for the availability or content of external sites that may be linked to, from the site. If you find a broken link or if you have any questions or concerns about a link, please contact us.

**Complaining**

When we receive a complaint, we record all the information you have given to us. We use that information to resolve your complaint. If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is. We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

Complaints regarding content on our website:

If you complain about any of the content on our website, we shall investigate your complaint.

If we feel it is justified or if we believe the law requires us to do so, we shall remove the content while we investigate. If we think your complaint is vexatious or without any basis, we shall not correspond with you about it.

How you can complain:

If you are not happy with our privacy policy or if have any complaint then you should tell us by email. Our address is DPM@swordofthespirit.net. If a dispute is not settled then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration. As a UK Charity our Supervisory Authority is the Information Commissioners Office. If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner’s Office. This can be done at <https://ico.org.uk/concerns/>

Compliance with the law

Our privacy policy has been compiled so as to comply with the law of every country or legal jurisdiction in which we aim to do business. However, we are a small organisation operating across multiple legal jurisdictions, so if you think we’ve got it wrong, or have failed to satisfy the law of your jurisdiction, we would be delighted to hear from you.

1. **Review of this privacy policy**

We may update this privacy policy from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website or submit your information to us. We advise you to print a copy for your records.

If you have any question regarding our privacy policy, please contact us at DPM@swordofthespirit.net.