

# **Privacy Policy**

Covers bookings, mailing list, volunteers, donations.

#### Our contact details

Name: Crowhurst Christian Healing Centre
Address: Forewood Lane, Crowhurst, East Sussex, TN33 9AD
Phone Number: 01424 830204/01424 830033

E-mail: <a href="mailto:enquiries@crowhursthealing.org.uk">enquiries@crowhursthealing.org.uk</a>
Website: <a href="mailto:www.crowhursthealing.org.uk">www.crowhursthealing.org.uk</a>

## The type of personal information we collect

We currently collect and process the following information:

- Personal identifiers, contacts and characteristics (title, name, address, telephone number, financial details relating to your donation and email address).
- The name and telephone number of an emergency contact when booking a stay.
- Dietary information and relevant health information when making a booking (which will allow us to best accommodate you).

Health and dietary information is classed as **Special Category Data** because it is likely to be more sensitive. We only collect Special Category Data about you when there is a clear reason for doing so, in this case to ensure safeguarding, meet our health and safety obligations and to appropriately accommodate guests using the centre.

## How we get the personal information and why we have it

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- An online or telephone booking at Crowhurst Christian Healing Centre
- You have given us permission to contact you in order to receive regular information and updates.
   You may have done this by completing a paper form, completing a website contact form or by completing our feedback form after a visit.
- You have made a donation and you may have also given us permission to claim gift aid on your donation.
- You volunteer with us or are a Prayer Partner and the information you provided allows us to manage our relationship and responsibilities towards you.

We also receive personal information indirectly, from the following sources in the following scenarios:

- When you make a donation via a third-party organization (e.g. Bank Bacs payment, Charities Aid Foundation, PayPal etc.) they will send us information related to your donation.
- References for some volunteer positions we may gather information from third party sources to help us judge the suitability of the position.
- We **do not** use cookies, that store information, on our website or bookings system. Our booking system requires the use of session cookies which browsers automatically delete when closed.

We use the information that you have given us in order to:



- Process your booking (e.g. sending you a confirmation of your booking and to contact if necessary regarding your booking).
- Provide you with the best possible visit/stay at the centre (your dietary and health needs enable
  us to ensure that individual guests needs are catered for and allows us to adhere to Health and
  Safety requirements).
- In the case of an emergency, use the emergency contact details you have provided.
- Send you regular newsletters, information and updates about Crowhurst Christian Healing Centre.
   If you have opted to receive information by email your contact details will be transferred to Mailchimp and processed by Mailchimp.
- If you are a volunteer or a Prayer Partner, we will send you regular prayer requests.
- To process your donations, to claim Gift Aid on your contributions and verify transactions.
- To manage and support the volunteer/Prayer Partner relationship we have with you.

In order to claim gift-aid on eligible donations, we share gift-aid information with HMRC.

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

- We have a contractual obligation (bookings).
- We have a legitimate interest (volunteer and Prayer Partners mailings).
- Not-for-profit body is our specific condition for processing special category information (condition d in Article 9).
- Your consent (to go on our mailing list). You are able to remove your consent at any time. You can
  do this by contacting <a href="mailto:enquiries@crowhursthealing.org.uk">enquiries@crowhursthealing.org.uk</a> / 01424 830204 / Crowhurst Christian
  Healing Centre, Forewood Lane, Crowhurst, East Sussex, TN33 9AD.
- We have a legal obligation (donations and Gift Aid processing).

## How we store your personal information

Your bookings information is securely protected and encrypted on the server. Paper copies are kept in a locked filing cabinet. We keep the information that you provided at the time of your booking for 2 years from your stay (unless you book again within that period). We will then dispose your information by deleting it from the server and shredding paper copies.

Our mailing list is securely held on a protected database. We keep the information that you provide until you withdraw consent or for 5 years. After this time we will contact you to check that you still wish to remain on our mailing list. If you wish to be removed from our mailing list, your information will be deleted permanently.

If you volunteer with us we securely retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal or reporting requirements.

Gift aid information is securely kept for 6 complete calendar years after last gift claimed on the declaration.



## Your data protection rights

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the right to object to the processing of your personal information in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at <a href="mailto:enquiries@crowhursthealing.org.uk">enquiries@crowhursthealing.org.uk</a> / 01424 830204 / Crowhurst Christian Healing Centre, Forewood Lane, Crowhurst, East Sussex, TN33 9AD if you wish to make a request.

### How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at Crowhurst Christian Healing Centre, Forewood Lane, Crowhurst, East Sussex, TN33 9AD / 01424 830033. You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113 ICO website: https://www.ico.org.uk

#### Privacy notice - TRACK & TRACE

Recording customer details: how we use your information

To support NHS Test and Trace (which is part of the Department for Health and Social Care) in England, we have been mandated by law to collect and keep a limited record of staff, customers and visitors who come onto our premises for the purpose of contact tracing.



By maintaining records of staff, customers and visitors, and sharing these with NHS Test and Trace where requested, we can help to identify people who may have been exposed to the coronavirus.

As a customer/visitor (over the age of 16) of Crowhurst Christian Healing Centre, you will be asked for the following details (unless you have 'checked in' using the NHS COVID-19 app):

the name of the customer or visitor

a contact phone number for each customer or visitor. (if a phone number is not available, an email address, or if neither are available, then postal address)

date of visit, arrival time and, where possible, departure time

Crowhurst Christian Healing Centre as the data controllers for the collection of your personal data, will be responsible for compliance with data protection legislation for the period of time it holds the information. When that information is requested by the NHS Test and Trace service, the service would at this point be responsible for compliance with data protection legislation for that period of time.

The NHS Test and Trace service as part of safeguarding your personal data, has in place technical, organisational and administrative security measures to protect your personal information that it receives from Crowhurst Christian Healing Centre, that it holds from loss, misuse, and unauthorised access, disclosure, alteration and destruction.

In addition, if you only interact with one member of staff during your visit, the name of the assigned staff member will be recorded alongside your information.

NHS Test and Trace have asked us to retain this information for 21 days from the date of your visit, to enable contact tracing to be carried out by NHS Test and Trace during that period. We will only share information with NHS Test and Trace if it is specifically requested by them.

For example, if another customer at the venue reported symptoms and subsequently tested positive, NHS Test and Trace can request the log of customer details for a particular time period (for example, this may be all customers who visited on a particular day or time-band, or over a 2-day period).

We may require you to pre-book appointments for visits or to complete a form on arrival.

Under government guidance, the information we collect may include information which we would not ordinarily collect from you and which we therefore collect only for the purpose of contact tracing. Information of this type will not be used for other purposes, and NHS Test and Trace will not disclose this information to any third party unless required to do so by law (for example, as a result of receiving a court order). In addition, where the information is only collected for the purpose of contact tracing, it will be destroyed by us 21 days after the date of your visit.

However, the government guidance may also cover information that we would usually collect and hold onto as part of our ordinary dealings with you (perhaps, for example, your name, date of birth and phone number). Where this is the case, this information only will continue to be held after 21 days and we will use it as we usually would, unless and until you tell us not to.

Your information will always be stored and used in compliance with the relevant data protection legislation.

The use of your information is covered by the General Data Protection Regulations Article 6 (1) (c) - a legal obligation to which we as a Crowhurst Christian Healing Centre are subject to. The legal obligation to which we're subject, means that we're mandated by law, by a set of new regulations from the government, to co-operate with the NHS Test and Trace service, in order to help maintain a safe operating environment and to help fight any local outbreak of corona virus.



Crowhurst Christian Healing Centre does not transfer personal data outside the UK, the EU or to anywhere else.

By law, you have a number of rights as a data subject, such as the right to be informed, the right to access information held about you and the right to rectification of any inaccurate data that we hold about you.

You have the right to request that we erase personal data about you that we hold (although this is not an absolute right).

You have the right to request that we restrict processing of personal data about you that we hold in certain circumstances.

You have the right to object to processing of personal data about you on grounds relating to your particular situation (also again this right is not absolute).

If you are unhappy or wish to complain about how your information is used, you should contact a member of staff in the first instance to resolve your issue.

If you are still not satisfied, you can complain to the Information Commissioner's Office. Their website address is www.ico.org.uk.

John Brown our Administration Manager is in charge of data protection duties of Crowhurst Christian Healing Centre.

We keep our privacy notice under regular review, and we will make new versions available on our privacy notice page on Crowhurst Christian Healing Centre website. This privacy notice was last updated on 14th April 2021.