



## Privacy Notice

### WHAT'S INCLUDED IN THIS PRIVACY NOTICE?

Echo Church exists

***'To plant missional hubs that echo Jesus everywhere through strategically PRAYING, creatively LOVING, continually CONNECTING and simply GROWING people to faith.'***

Our heart is to see the church mobilised to reach the unreached starting with a particular focus on the East End of London. Jesus taught us in Matthew 28:19 to *'Go and make disciples of all nations, baptising them in the name of the Father, son and Holy Spirit.'*

Our heart is to pioneer and build churches that pray, love, connect and grow every person that it comes into contact with.

This document (our “privacy notice”) sets out information relating to how we use personal information relating to individuals we have dealings with, including individuals attending our churches, using our website, booking into events, people wishing to find out more about Echo Church, people wishing to obtain information from Echo Church, people wishing to contact Echo church for any reason It also sets out information about what rights individuals have in relation to their personal information and various other matters required under data protection law.

In particular, this privacy notice provides information to individuals about how they can object to our use of their personal information, how they can withdraw any permissions they have given to us to enable us to process their personal information and how they can make a complaint.

This privacy notice contains the following sections:

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## **1. Who does this privacy notice apply to?**

This privacy notice applies to:

- Individuals who use our booking facilities
- Individuals who contact us for information about Echo Church or contact Echo Church with questions or queries
- Individuals who use our websites
- Individuals who subscribe to our newsletters or updates
- Individuals who are listed as part of our Echo Hubs or other Echo events we run
- Donors
- Individuals who we engage to provide services to us

In the sections below, when referring to the individuals listed above, we use the terms “you” or “your”.

## 2. What’s our approach to privacy?

We take your privacy extremely seriously and want you to feel confident that your personal information is safe in our hands.

We will only use your personal information in accordance with data protection law applicable to England and Wales from time to time.

Under data protection law, when we use your personal information, we will be acting as a data controller. Essentially, this means that we will be making decisions about how we want to use your personal information and why.

Below, we summarise the main rules that apply to us under data protection law when we use your personal information:

1	We must be upfront about how we intend to use your personal information and must use your personal information fairly. Providing privacy information to individuals (such as in this privacy notice) is one aspect of using personal information fairly and complying with this obligation.
2	<p>We must only use your personal information if one of the legal grounds set out in data protection law apply. These legal bases include:</p> <ul style="list-style-type: none"> <li>• That you have consented to our use of your personal information;</li> <li>• That we need to use your personal information to perform a contract between us (or to take steps at your request prior to entering into a contract);</li> <li>• That we (or someone else) have a legitimate reason for needing to use your personal information and those legitimate interests are not outweighed by your rights or interests. This is known as having a “legitimate interest”. We must balance our respective rights and interests before we can rely upon this</li> </ul>

	<p>legal basis; or</p> <ul style="list-style-type: none"> <li>• We need to use your personal information to comply with laws we are subject to.</li> </ul>
3	<p>We must only use certain types of sensitive personal information (such as information relating to your health, racial or ethnic origin or religion) if we can also satisfy one of the conditions for processing this type of information set out in data protection law. These conditions include:</p> <ul style="list-style-type: none"> <li>• That you have given us your explicit consent to use the information;</li> <li>• We need to use the information in the course of the legitimate activities of Echo Church and the information is not being disclosed outside Echo Church as per article 9(2)(d) of UK GDPR;</li> <li>• You have made the information public;</li> <li>• We need to use the information to protect your vital interests or the vital interests of another person;</li> <li>• We need to use the information in connection with a legal claim; and</li> <li>• That the processing is necessary for reasons of substantial public interest.</li> </ul>
4	<p>We are only permitted to share your personal information with others in certain circumstances and if we take steps to ensure that your personal information will be secure.</p>
5	<p>Generally speaking, we must only use your personal information for the specific purposes we have told you about. If we want to use your personal information for other purposes, we need to contact you again to tell you about this.</p>
6	<p>We must not hold more personal information than we need for the purposes we have told you about and must not retain your personal information for longer than is necessary for those purposes (this is known as the “retention period”). We must also dispose of any information that we no longer need securely.</p>
7	<p>We must ensure that we have appropriate security measures in place to protect your personal information.</p>
8	<p>We must act in accordance with your rights under data protection law.</p>
9	<p>We must not transfer your personal information outside the United Kingdom unless certain safeguards are in place. One such safeguard is that the personal data is only transferred to a country that has been approved by the UK Information Commissioner’s Office as having an acceptable level of data protection law.</p>

### 3. How will we use your personal information?

How we will use your personal information, the legal bases we will rely upon, how long we will keep your personal information and other details will depend upon who you are and why we need your personal information in the first place.

In this section, we provide specific privacy information relating to the different categories of individuals that this privacy notice applies to.

## **INDIVIDUALS WHO USE OUR BOOKING SYSTEM**

What personal information we will use?	<ul style="list-style-type: none"><li>• Your name;</li><li>• Your address;</li><li>• Your email address;</li><li>• Your telephone number;</li><li>• Bank or credit card details (depending on the event; and</li><li>• Details of any complaints.</li></ul>
How will we obtain the personal information?	Provided by you when booking into an event
What purposes we will use the personal information for?	<ul style="list-style-type: none"><li>• We will use your name, address and other contact details to book in for the event and to communicate with you about such event.</li><li>• We will also use this information to deal with any complaints, that you make;</li><li>• We will use your bank or credit card details to take payment for any event charges.</li><li>• Other than your bank or credit card details, we will keep a record of the information listed above for our internal administrative purposes;</li><li>• We will also use the above information (other than your bank and credit card details), for legal and regulatory purposes.</li></ul>
The legal bases for processing we rely upon	<ul style="list-style-type: none"><li>• Our use of your personal information in connection with the provision of events, taking payment and dealing with any complaints is necessary for</li></ul>

	<p>the performance of the contract between us;</p> <ul style="list-style-type: none"> <li>• Our use of your personal information for our internal administrative purposes is based on our legitimate interests in ensuring that our business is run properly and efficiently;</li> <li>• Our use of your personal information for legal or regulatory purposes is necessary to enable us to comply with our legal and regulatory obligations and/or to enable us to bring, defend or deal with legal claims.</li> </ul>
How long we retain the personal information and why	<ul style="list-style-type: none"> <li>• We only use your bank or credit card details for the purposes of taking payment. We do not store such information.</li> <li>• We usually keep records relating to any booking you make for one year in case of any disputes.</li> </ul>
Consequences of not providing/permitting us to obtain personal information	<ul style="list-style-type: none"> <li>• Without your name, payment and contact details we will be unable book facilities for you</li> </ul>

## **INDIVIDUALS WHO CONTACT US FOR INFORMATION ABOUT ECHO CHURCH OR CONTACT ECHO CHURCH WITH QUESTIONS OR QUERIES**

What personal information we will use?	<ul style="list-style-type: none"> <li>• Your name;</li> <li>• Your contact details (such as your telephone number or email address)</li> <li>• Your connection with Echo church if relevant</li> <li>• Details of enquiry</li> </ul>
How will we obtain the personal information?	Provided by you when you contact us (e.g. by making a phone call or emailing us) or make

	an enquiry at any of our hubs or gatherings.
What purposes we will use the personal information for?	<ul style="list-style-type: none"> <li>• We will use the personal information to deal with your enquiry;</li> <li>• We will also make a record of your enquiry for internal administrative purposes.</li> </ul>
The legal bases for processing we rely upon	<ul style="list-style-type: none"> <li>• Our use of your personal information to deal with your enquiry is based on your implied consent and our legitimate interests in ensuring our church is run efficiently and effectively;</li> <li>• Our use of your personal information for record keeping purposes is based on our legitimate interests in ensuring our church is run efficiently and effectively.</li> <li>• Where the details of your enquiry reveal your religious belief because of your connection or contact with Echo church, our processing of that information will be carried out only where it is in the course of our legitimate activities, and won't be transferred outside Echo church without your consent.</li> </ul>
How long we retain the personal information and why	<ul style="list-style-type: none"> <li>• Records of correspondence are retained for one year, unless such information relates to safeguarding queries, in which case it is archived indefinitely</li> </ul>
Consequences of not providing/permitting us to obtain personal information	<ul style="list-style-type: none"> <li>• Without your name, payment and contact details we will be unable to deal with your enquiry</li> </ul>

## INDIVIDUALS WHO USE OUR WEBSITES

What personal information we will use?	<ul style="list-style-type: none"> <li>• Technical information, including the internet protocol address used to connect your computer to the internet including but not limited to your browser type and version, time zone setting, browser plug-in types and versions, operating system and platform and, your login information (if you use the member area of the site), using Google Analytics;</li> <li>• Information about your visit, including, via Google analytics, the full Uniform Resource Locators ("URL"), clickstream to, through and from our website (including date and time), products you viewed or searched for, page response times, download errors, length of visit to certain pages, page interaction information (such as scrolling clicks and mouse-overs), methods used to browse away from the page.</li> </ul>
How will we obtain the personal information?	<ul style="list-style-type: none"> <li>• Some of the information is obtained by us automatically whenever you use our websites;</li> <li>• Some of the information is collected by us each time you use our websites through our use of cookies.</li> </ul>
What purposes we will use the personal information for?	<ul style="list-style-type: none"> <li>• The above information is used by us to: make tailored websites available to you;</li> <li>• track usage of our websites;</li> <li>• help us to continually improve our websites</li> </ul>
The legal bases for processing we rely upon	<ul style="list-style-type: none"> <li>• Our collection and use of the above information is based on our legitimate interests in ensuring that our websites</li> </ul>



	are user- friendly and appeals to our customers and staff.
How long we retain the personal information and why	<ul style="list-style-type: none"> <li>Such information will be retained for one year. The data may be held permanently on Google Analytics platform.</li> </ul>
Consequences of not providing/permitting us to obtain personal information	<ul style="list-style-type: none"> <li>If you disable our Cookies, you will be unable to use certain parts of/functions on our websites.</li> </ul>

## INDIVIDUALS WHO SUBSCRIBE TO OUR NEWSLETTERS OR UPDATES

What personal information will we use?	<ul style="list-style-type: none"> <li>Your name and address;</li> <li>Your email address;</li> <li>Your delivery preferences.</li> <li>Your association with Echo Church</li> </ul>
How will we obtain the personal information?	<ul style="list-style-type: none"> <li>Provided by you when you subscribe to our newsletters or updates.</li> </ul>
What purposes we will use the personal information for?	<ul style="list-style-type: none"> <li>To provide you with the newsletters or updates you have requested;</li> <li>To provide you with related information that we think may be of interest to you.</li> </ul>
The legal bases for processing we rely upon	<ul style="list-style-type: none"> <li>We will rely on your consent to provide you with the newsletters or updates you have requested and retain your details on our subscriptions database;</li> <li>We will rely on our legitimate interest in promoting our products and services to provide you with other information that may be of interest to you.</li> </ul>
How long we retain the personal information	<ul style="list-style-type: none"> <li>We will retain such details until such</li> </ul>

and why	time as you confirm that you would like us to unsubscribe.
Consequences of not providing/permitting us to obtain personal information	<ul style="list-style-type: none"> <li>● Without your contact details, we will not be able to provide you with newsletters and updates;</li> <li>● You can opt-out of receiving related information at the time you subscribe to our newsletters and updates and each subsequent time we contact you.</li> </ul>

**INDIVIDUALS WHO ARE LISTED AS ECHO CHURCH MEMBERS WHETHER THROUGH AN ECHO HUB OR OTHER ACTIVITIES**

What personal information will we use?	<ul style="list-style-type: none"> <li>● Your name;</li> <li>● Your address;</li> <li>● Your email address;</li> <li>● Your telephone number;</li> <li>● Your religious preferences;</li> <li>● Disclosure and Barring Service (DBS) checks and other criminal background checks where services are being provided for young and/or vulnerable people;</li> <li>● Your date of birth.</li> </ul>
How will we obtain the personal information?	<ul style="list-style-type: none"> <li>● Provided by you when you sign up to connect with Echo Church via the website/linktree or a connect card.</li> </ul>
What purposes we will use the personal information for?	<ul style="list-style-type: none"> <li>● We will use your name, address and other contact details to list you as an attender of Echo church and/or to communicate with you in relation to such listing.</li> <li>● We will keep a record of the information listed above for our internal administrative purposes;</li> <li>● We will also use the above information for legal and regulatory</li> </ul>

	purposes.
The legal bases for processing we rely upon	<ul style="list-style-type: none"> <li>● Our use of your personal information for our internal administrative purposes is based on our legitimate interests in ensuring that our church is run properly and efficiently;</li> <li>● Our use of your personal information for legal or regulatory purposes is necessary to enable us to comply with our legal and regulatory obligations and/or to enable us to bring, defend or deal with legal claims.</li> </ul>
How long we retain the personal information and why	<ul style="list-style-type: none"> <li>● We will retain such details whilst you are still part of Echo church unless you ask for them to be removed. Having left the church, we will retain the information indefinitely unless specified otherwise.</li> </ul>
Consequences of not providing/permitting us to obtain personal information	<ul style="list-style-type: none"> <li>● Without your contact details, we will be unable to share information with you regarding Echo Church.</li> </ul>

## DONORS

What personal information will we use?	<ul style="list-style-type: none"> <li>● Your name;</li> <li>● Your address;</li> <li>● Your email address;</li> <li>● Your telephone number;</li> <li>● Your Bank Account Details;</li> <li>● Whether you are a UK taxpayer;</li> </ul>
How will we obtain the personal information?	<ul style="list-style-type: none"> <li>● The information is provided directly when donating via our website aoggb.com, by telephone or post or through churchsuite.</li> </ul>
What purposes we will use the personal information for?	<ul style="list-style-type: none"> <li>● We will use the personal information in order to process your donation</li> </ul>

	(whether a one off or a regular donation) and to obtain any tax reimbursements through gift aid.
Who we share your personal information with	<ul style="list-style-type: none"> <li>● We will share your name, amount of your donation and whether tax is reclaimed with you for accounting and records purposes.</li> <li>● We will share your personal information with HMRC in order to obtain any gift aid tax reimbursements, where applicable.</li> </ul>
The legal bases for processing we rely upon	<ul style="list-style-type: none"> <li>● Is that it is in our legitimate interests to process the personal information to process your donation and to obtain any tax reimbursements. These donations allow AoG to further its aims and interest. By making a donation you are supporting those aims.</li> <li>● If and to the extent that your donation to Echo church reveals your religious beliefs, our processing of that information will be carried out only where it is in the course of our legitimate activities, and won't be transferred outside AoG without your consent.</li> </ul>
How long we retain the personal information and why	<ul style="list-style-type: none"> <li>● Your contact details will be retained for the duration of the giving.</li> </ul>
Consequences of not providing/permitting us to obtain personal information	<ul style="list-style-type: none"> <li>● Failure to provide us with your name address and bank account details will mean we cannot process any donation other than a cash or cheque donation.</li> </ul>

## INDIVIDUALS WHO WE ENGAGE TO PROVIDE SERVICES TO US

What personal information will we use?	<ul style="list-style-type: none"> <li>● Your name and contact details;</li> <li>● Your bank account details.</li> </ul>
How will we obtain the personal information?	<ul style="list-style-type: none"> <li>● Provided by you when you agree to provide us with services.</li> </ul>
What purposes we will use the personal information for?	<ul style="list-style-type: none"> <li>● To enter into an agreement with you, to contact you, to administer the agreement for services and to pay you.</li> </ul>
The legal bases for processing we rely upon	<ul style="list-style-type: none"> <li>● The use of your personal information to enter into an agreement for services, for correspondence in relation to the services and associated matters and to make payment for services provided will be necessary for the purposes of taking steps prior to entering into a contract with you and for the performance of the contract between us.</li> </ul>
How long we retain the personal information and why	<ul style="list-style-type: none"> <li>● We will retain your personal information for the duration of the provision of services and for 6 years therefore in case there should be any contractual dispute.</li> </ul>
Consequences of not providing/permitting us to obtain personal information	<ul style="list-style-type: none"> <li>● Without your personal information, we will not be able to engage you to provide us with services nor will we be able to pay you.</li> </ul>

#### **4. When will we use your personal information for direct marketing?**

In addition to data protection law, if we use your personal information for direct marketing purposes, we may also be subject to additional rules that regulate direct marketing. The term

“direct marketing” essentially means directing marketing material or advertising at a particular individual.

To ensure compliance with both data protection laws and the specific rules relating to direct marketing, we will only use your personal information to tell you about our latest offers or to inform you of products and services which we think may be of interest to you in the circumstances outlined below:

Direct marketing by telephone or post	<ul style="list-style-type: none"><li>• We will only contact you in this way if you have given us your express consent to do so.</li></ul>
Direct marketing by email, text or other forms of electronic communication	<p>We will only contact you in this way if:</p> <ul style="list-style-type: none"><li>• you have given us your express consent to do so; or</li><li>• you are an existing customer and we want to tell you about similar products or services that may be of interest to you and you have not opted out of receiving such communications.</li></ul>

Our legal bases for such processing under data protection law will either be your consent. We will retain your personal information unless and until you inform us that you no longer wish to receive direct marketing information from us. You can ask us to stop sending direct marketing to you at any time by contacting us using the details set out below or following the “unsubscribe” options contained within all our email correspondence.

## **5. When will we share your personal information with others?**

Sometimes, we will need to share your personal information with others. This section sets out details of who we will share your personal information with and why. It also tells you about our legal basis for doing so under data protection law and steps we will take to protect your personal Information.

We will never sell your personal information on to third parties.

Who are our service partners?	<p>Our service partners include:</p> <ul style="list-style-type: none"><li>• event organisers</li></ul>
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	<ul style="list-style-type: none"> <li>• third party IT providers</li> <li>• gift aid processors</li> <li>• online ticketing platforms for booking event attendance;</li> <li>• Legal, HR and other professional advisors</li> <li>• Website providers and designers</li> <li>• Database management providers</li> <li>• couriers and other suppliers of delivery services.</li> </ul> <p>We haven't included the names of our service partners in this privacy notice because their identity will change from time to time. However, if you would like further information about any of our current service providers, please contact us using the details set out below.</p>
Why we need to share your personal information with them	<p>We use the service partners described above to enable us to perform our contracts with you and to receive a variety of services which Echo church requires as an organisation. A full list is not provided as this can change from time to time, but the services we engage are set out below.</p> <p>Various types of data, including sensitive personal data will be processed with our service providers from time to time to in the provision of services to Echo church:</p>
What precautions do we take?	<p>We enter into contracts with our service providers which require them to put appropriate security measures in place and which restrict their use of your personal information.</p>

## 6. Circumstances in which we will send your personal information outside the UK

If we do transfer your personal data outside the UK, we will use one of these safeguards to make sure it is protected: We will only transfer it to a country which the Information Commissioner's Office has decided has an adequate level of protection for personal data. You can find more about such countries here

<https://ico.org.uk/about-the-ico/what-we-do/information-commissioners-opinions-on-adequacy/>;  
or G:3211967v2

We will put a written contract in place between us and the recipient that incorporates the European Commission's model clauses relating to the transfer of personal data outside the EEA (to the extent they continue to apply to the UK) and any such other model clauses recommended and required by UK GDPR.

## **7. How do we keep your personal information secure?**

We take various steps to protect your personal information while it is in our possession, including:

- Implementation of appropriate security measures to protect our IT infrastructure (including but not limited to the use of passwords, other forms of encryption, two factor authentication and user restrictions to limit access).
- Implementation of internal data security policies and training for members of staff in relation to such policies;
- Regular reviews of data security measures implemented by service providers who may handle your personal data;

You can help us to protect your personal information by adhering to the following security Measures:

- Where we provide you with user logon details, keep your passwords private;
- When creating a password, do not use words such as your name, date of birth or other personal data;
- Change your password regularly.

## **8. What rights do you have under Data Protection law?**

Under data protection law, you have a number of different rights relating to the use of your personal information. The table below contains a summary of those rights and our obligations.

More information about your rights and our obligations can be found on the ICO website <https://ico.org.uk/>.

Your rights	What this involves	What our obligations are
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A right of access	This is a right to obtain access to your personal data and various supplementary information.	<ul style="list-style-type: none"> <li>• We must provide you with a copy of your personal information and the other supplementary information without undue delay and in any event within 1 month of receipt of your request;</li> <li>• We cannot charge you for doing so save in specific circumstances (such as where you request further copies of your personal information).</li> </ul>
A right to have personal data rectified	This is a right to have your personal information rectified if it is inaccurate or incomplete.	<ul style="list-style-type: none"> <li>• We must rectify any inaccurate or incomplete information without undue delay and in any event within 1 month of receipt of your request;</li> <li>• If we have disclosed your personal information to others, we must (subject to certain exceptions) contact the recipients to inform them, that your personal information requires rectification</li> </ul>
A right to erasure	This is a right to have your personal information deleted or removed. This right only applies in certain circumstances (such as where we no longer need the personal information for the	<ul style="list-style-type: none"> <li>• If this right applies, we must delete or remove your personal information without undue delay and in any event within 1 month of receipt of your request;</li> </ul>

	<p>purposes for which it was collected).</p> <p>We have the right to refuse to delete or remove your personal data in certain circumstances.</p>	<ul style="list-style-type: none"> <li>• If we have disclosed your personal information to others, we must (subject to certain exceptions) contact the recipients to inform them that your personal information must be erased.</li> </ul>
A right to data portability	<p>This is a right to obtain and re-use your personal information for your own purposes;</p> <p>It includes a right to ask that your personal information is transferred to another organisation (where technically feasible).</p> <p>This right only applies in certain limited circumstances.</p>	<ul style="list-style-type: none"> <li>• If this right applies we must provide your personal information to you in a structured, commonly used and machine readable form</li> <li>• Again, we must act without undue delay and in any event within 1 month of receipt of your request;</li> <li>• We cannot charge you for this service.</li> </ul>
A right to object	<p>This is a right to object to the use of your personal information.</p> <p>The right applies in certain specific circumstances only.</p> <p>You can use this right to challenge our use of your personal information based on our legitimate interests;</p> <p>You can also use this right to object to use of your personal information for direct marketing</p>	<ul style="list-style-type: none"> <li>• If you object to us using your personal information for direct marketing, we must stop using your personal information in this way as soon as we receive your request.</li> <li>• If you object to other uses of your personal information, whether we have to stop using your personal information will depend on the</li> </ul>

		particular circumstances.
A right to object to automated decision making	This is a right not to be subject to a decision which is made solely on the basis of automated processing of your personal information where the decision in question will have a legal impact on you or a similarly significant effect.	<ul style="list-style-type: none"> <li>• Where such a decision is made, you must be informed of that fact as soon as reasonably practicable;</li> <li>• You then have 21 days from receipt of the notification to request that the decision is reconsidered or that a decision is made that is not based solely on automated processing;</li> <li>• Your request must be complied within 21 days.</li> </ul>
A right to restrict processing	This is a right to 'block' or suppress processing of your personal information. This right applies in various circumstances, including where you contest the accuracy of your information.	<ul style="list-style-type: none"> <li>• If we are required to restrict our processing of your personal information we will be able to store it but not otherwise use it.</li> <li>• We may only retain enough information about you to ensure that the restriction is respected in future.</li> <li>• If we have disclosed your personal information to others, we must (subject to certain exceptions) contact them to tell them about the restriction on use</li> </ul>

If you wish to exercise any of your rights, you can make a request by contacting us using the details set out below.

If you request the exercise of any of your rights we are entitled to ask you to provide us with any information that may be necessary to confirm your identity.

### **9. Your right to withdraw consent**

If you have given us your consent to use any of your personal information, you can withdraw your consent at any time. To do so, please contact us using the details set out below.

### **10. How can you get in touch with us and who is our data protection lead?**

You can get in touch with us in the following ways:

Telephone number:	07824 424 846
Email:	echochurchuk@gmail.com

We have appointed Data Privacy Lead to oversee our compliance with data protection law and this privacy notice. Their details are as follows:

**Roselyn Mugeru**

If you have any questions about this privacy notice, how we handle your personal information or if you wish to make a complaint, please contact the above person.

### **11. Right to complain to the information commission officer**

If we are unable to deal with a complaint to your satisfaction or if you are unhappy with the way we are using your personal data, you also have the right to make a complaint at any time to the UK's supervisory authority for data protection issues, the Information Commissioner's Office.

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

We may update this privacy notice from time to time. If we make any substantial updates, we will provide you with a new privacy notice. We may also notify you in other ways from time to time about the processing of your personal information.