



## **OPAL Trust UK Privacy Policy**

Approved by Board of Trustees of OPAL Trust UK – June 2020

Policy Review date by Board of Trustees - June 2023

At OPAL Trust we are deeply grateful for the prayers, gifts and time received from all our supporters. We could not do our work without your vital help.

OPAL Trust values everyone who engages with us by whatever means, and we are committed to protecting your privacy and respecting your personal information. While we cannot guarantee that loss, misuse or alteration of data will not occur while it is under our control, we will do all we can to protect your privacy and to make sure the personal data you provide us is kept safe and only used for purposes you have agreed to and in ways we believe you would reasonably expect. We aim to be clear about how we collect your details, how we use and store information and what it means for you, and this is explained in this Privacy Policy. We welcome any feedback about any of our activities and policies, just email us at [info@opaltrust.org](mailto:info@opaltrust.org)

We aim to communicate with you respectfully and efficiently, and to give you clear choices as to what information you supply to us. We want to share news of our work with you by the means you have chosen as the most convenient to you – email, SMS, phone, post. If you no longer wish to receive information from us, please contact us on [info@opaltrust.org](mailto:info@opaltrust.org)

Your continued use of the OPAL Trust website means you are happy for us to use your personal information as described in this notice.

### **How we collect information**

#### **When you give it directly to us**

We collect some personal information each time you contact us. For example, when you make a donation, ask to receive materials or information about our work, engage with OPAL Trust through social media channels, sign up for an event, or order resources or services from us.

### **From website interaction with us**

Non-personal data such as IP addresses, details of pages visited and files downloaded is collected when you visit the website. Website usage information collection includes the use of cookies.

### **Indirectly from third parties**

Your information may be shared with us by 3<sup>rd</sup> parties such as Stewardship, CAF or through bank payment details, when you give a gift to us. These organisations will only do so with your consent if you have indicated you wish to support OPAL Trust. You may wish to check their privacy policy to find out how they will process your data.

### **Where you give your permission to other organisations**

The information we get from other organisations may depend on your privacy settings or the permissions you give them, so you should check these regularly. We may collect information that you make publicly available on, for example, Twitter, Facebook, Whatsapp, LinkedIn or similar organisations. Please check their privacy policy to find out more information on how they will process your data.

### **Other publicly available data**

We may collect information from Companies House, the Charity Commission, grant making trusts and information published in articles, newspapers or blogs.

### **What sorts of personal information we might collect from you**

If you are a supporter of our work and make a donation, sign up to receive news of our work, volunteer, attend an event, or order something from us, we will may collect details such as:

- Your name
- Your contact details, including postal address, email address, telephone numbers and information about your preferences as to how you wish us to contact you in the future. These help us if there is a problem with an order.
- Your bank account details if you make a regular donation by direct debit or standing order
- Debit or credit card details used to make a donation or order resources – this could be online, over the phone or by mail. Information given will be processed securely and in accordance with the Payment Industry Standards. Your details are only used to complete the transaction you requested, and we do not store your debit or credit card details. If you have provided them physically, they will be destroyed once your donation or payment has completed
- Your Gift Aid status and any information relevant to that
- Your position within an organisation or charity (if relevant)
- Other personal information you share with us, such as about your family, denomination, home church, and any health issue you may have told us about to help us communicate with you in the most helpful way (e.g. large print)
- Our website and services are targeted at persons over the age of 18. If we have a reason to believe that we hold personal data of a person under that age in our databases, we will delete that personal data

## **Use of cookies**

Like most websites, we use 'cookies' to help us make our site, and the way you use it, better. A cookie is a text file that is sent from our website as soon as you visit the site. It is stored on your computer's hard drive and helps us to identify your computer (not you) and collects information in an aggregate, anonymous way.

Cookies may be used to collect information about your visit to our website, for example, traffic data, location data, device information, the date and time of your visit and the pages that you visit.

OPAL Trust may store information about you and your activities in cookies. If you want to delete cookies stored on your computer, please use the instructions from your file management software to locate the file or directory where the cookies are stored. If cookies are being collected, you will be informed about this when you visit the website, and you will be given the option to accept or decline. Most browsers allow you to turn off the cookie function. To do this you can look at the Help function on your browser.

## **How do we use the information we collect?**

The information we gather helps us send you what you want when you want it, to fulfil orders for resources, and send you updates and information about our work. Having accurate information helps us steward our resources so that the maximum amount goes to supporting the core mission of OPAL Trust.

## **Processing of requests / donations / calls to action**

- We may use the personal data we collect to:
- Keep you up to date on news and stories about our mission and work
- Request support, such as prayer
- Administer donations you give us, or to support your giving to us, including GIFT Aid
- Provide information packs, for example, events leaflets or magazines you have requested
- Provide a personalised service, such as customised website content or personalised emails
- Ensure we know how you prefer to be contacted
- Keep records of your relationship with us, for example, donations you have made, questions you have asked, or comments or complaints you have made
- Understand how we can improve your experience as a supporter based on your interest and interaction with us

- Understand how we can improve our services, resources, and the information we send out
- Contact you in your capacity as a representative of an organisation such as a church, business, or charity
- Ensure potentially vulnerable people are treated appropriately
- If you make a gift to our work, we will contact you to thank you and discuss ways in which we can give you further information about our work. This would include having a discussion with you about the methods of contact most suitable for you

**We do not sell or share personal details to third parties for the purposes of their marketing.**

### **Basis of processing your data**

#### **Supporters joining us on or after 1<sup>st</sup> January 2018**

From 1<sup>st</sup> January 2018, we will process any new supporters' data based on the consent you have given us. You can change your preferences at any time or object to us processing your data by contacting us by telephone, post or email as shown in the section 'Your choices and telling us when things change' below.

#### **Supporters who joined us prior to 1<sup>st</sup> January 2018**

If you were an existing supporter as of 1<sup>st</sup> January 2018, we will use your support for us over the previous three-year period as a legitimate interest reason to continue to send you the communications you receive from us. This includes if you have made a donation or updated us with new information to help us send you the right communications for your needs. If you have previously asked us not to contact you, we will continue to respect your wishes. You can change your preferences at any time or object to us processing your data by contacting us by telephone, post or email as shown below.

**Contacting the right supporters at the right time:** When you make a donation, a series of donations, express an interest in our work, or indicate that you may wish to give to our work, we will rely on our legitimate interest in order to collect additional information as noted above in 'Processing of requests / donations / calls to action'. This helps us to identify those supporters who would benefit from an initial discussion with us to ensure we use our supporters' money in the most effective ways.

### **Legitimate interest for potential supporters**

We may rely on legitimate interest to contact you or hold information about you:

- If you publicly share information about your interests and concerns that overlap with an area of activity of OPAL Trust's work
- If as a result of publicly available information you are identified as someone who may have an interest in our work

Any information gathered would be used to help to plan an appropriate approach, such as a meeting or invitation to an event where we could share information about OPAL Trust and explore your interest and opportunities for support.

### **Applying for a job or volunteering with us**

- Where you provide personal data and sensitive personal data when applying for a job or a voluntary position with us, such as the information on your CV, we will process, store and disclose the personal data we collect to:
- Support the recruitment process
- Enable you to submit your CV, apply online for jobs and to subscribe for alerts about job types of interest to you
- Answer any questions you may have
- Use third parties to provide services such as references, qualifications, criminal referencing, checking services, verification of information you have provided, health screening and psychometric evaluation or skills tests

### **How and where we store your information**

#### **Security**

The security of your information is very important to us. We will ensure that there are appropriate controls in place to protect any personal data you provide. We ensure that access to personal data is restricted only to those staff members or volunteers whose job roles require such access and that suitable training is provided for these staff members and volunteers.

Your information may occasionally be passed to service providers who perform functions on our behalf, such as sending postal mail, emails, or analysing data. These companies may only use your information to perform these functions and may not use it for any other purposes. When we do so, we carry out checks on these companies, put in place contracts to make sure our expectations and requirements are clear as to how they manage the personal data that have been collected or to which they have access, and carry out periodic reviews. They are required to destroy this information once the function for which it has been transferred has been carried out.

#### **Credit / debit card security**

If you use your debit or credit card to donate to us, or make a payment for goods, whether over the phone or by mail, we will process your information securely in accordance with the Payment Card Industry Data Standard.

We do not store your debit or credit card details once your transaction has completed. All card details are securely destroyed once your donation or payment has completed.

We hold bank account details for the purpose of collecting direct debits in accordance with direct debit mandate rules.

However, despite all the security and protection we put in place, the internet and postal delivery services cannot be guaranteed to be 100% secure, and you submit data at your own risk.

### **Where we store your personal information**

Because of the nature of servers and cloud-based storage systems used to store and to process data, some data may be processed outside of the European Economic Area (EEA). Although these systems may be in locations that are not subject to the same data protection laws as in the UK, we will take all reasonable steps to ensure they provide an adequate level of protection in accordance with UK data protection law. We take all reasonable steps to ensure that your data is stored and processed securely in accordance with this policy. By submitting your personal data you agree to this potential transfer, storing and processing of your information at a location outside the EEA.

### **When we share your information**

We will only ever share your data in other circumstances if we have your explicit, informed and unambiguous consent.

In line with our beliefs, we do not share or swap your information with any other charities.

### **Legal duty**

We may need to pass on information if required by law or by a regulatory body. For example, a GIFT Aid audit by the HMRC, or if asked for details by a law enforcement agency.

### **Our service providers and third parties**

Occasionally we may employ agents to carry out tasks on our behalf, such as processing donations. These agents are bound by contract to protect your data and we remain responsible for their actions.

We may provide third parties with general information about users of our site, but this information is both aggregate and anonymous. However, we may use IP address information to identify a user if we feel that there are or may be safety and/or security issues or to comply with legal requirements.

### **How long?**

We will keep your personal information only for as long as we consider it necessary to carry out each activity. We take account of legal obligations, and accounting and tax considerations, as well as considering what would be reasonable for the charity's monitoring of income.

We will keep a record of any personal donations you have made for at least seven years.

Legacy gifts are an important part of the funding for our work. We may keep data provided by you or your solicitor indefinitely in order to carry out the administration of legacies and to communicate with the families of those leaving us legacies.

If you ask us to cease communications with you, we will keep a record of your contact details and appropriate information to enable us to comply with your request.

If you have any questions about our data retention, please contact us in writing at:

OPAL Trust  
Administrative Office  
2B Green Street  
DARVEL  
East Ayrshire  
KA17 0AY

or: [info@opaltrust.org](mailto:info@opaltrust.org)

## **Contents of Emails**

Email messages and any associated files are intended solely for the use of the individual or entity to whom they are addressed and contain the views of the author. If you have received an email from OPAL Trust in error, please reply immediately and delete it from your computer. Because email moves through different servers on the internet, and different server administrators may be able to read what you send, we cannot ensure or guarantee that loss, misuse or alteration of data will not occur as data is being transferred, Email was not built for the transmission of confidential information, and therefore is not secure. OPAL Trust is therefore not bound by anything stated in an email purporting to be from OPAL Trust, and shall not be liable for any losses as a result of virus transmission, although safeguards are in place to protect against this. Emails and email addresses may be susceptible to alteration. You should not assume that the contents originated from OPAL Trust, or that they have been accurately reproduced from their original form. OPAL Trust accepts no responsibility for information, errors or omissions in an email message, nor for its use or misuse, nor for any act committed or omitted in connection with it. If you are suspicious about any email or other message claiming to be from OPAL Trust please contact the sender by another means to verify its contents.

## **Your choices and telling us when things change**

### **Preferences**

You can change your preferences on what you receive from us, including marketing and fundraising materials, or how we contact you, by mail, phone or email, at any time.

You can do so by:

Emailing us at: [info@opaltrust.org](mailto:info@opaltrust.org)

### **Write to us at:**

Opal Trust  
Administrative Office  
2B Green Street  
DARVEL, East Ayrshire  
KA17 0AY

## **Keeping your information up to date**

We do appreciate it if you keep your details up to date. You can do so in the same way as updating your preferences.

We may use publicly available sources such as Post Office address search, postcode lists to keep our records up to date and accurate.

We will not use these sources to create data that you have chosen not to provide, for example, if you have left a telephone number blank. We will normally only update your contact details (email address, postal address, telephone number) when you tell us they have changed. We would really appreciate it if you let us know of changes to any of these details, because this gives us consent to use the updated information and continue to communicate with you.

We will take appropriate measures to ensure that information is only kept for as long as necessary, and only for the purpose for which it was given. We will also only use it when regulations permit us to do so.

## **Telling us to stop processing your data**

You have the right to ask us to erase your personal data, to ask us to restrict our processing or to object to our processing of your personal data. You can do so at any time by writing to us at:

### **Write to us at:**

Opal Trust  
Administrative Office  
2B Green Street  
DARVEL  
East Ayrshire  
KA17 0AY

**Or emailing us at:** [info@opaltrust.org](mailto:info@opaltrust.org)

## **Access to your information - Your rights under DPA 1998 and GDPR**

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.

If you want to access your information please send a description of the information you want to see, and proof of your identity, to Opal Trust at the postal address given above. These requests are not accepted by email, so we can ensure that we only provide personal information to the right person. We will respond within one month of receiving your letter. If there are any discrepancies in the details we provide, please let us know and we will correct them.

For more information about your rights under the General Data Protection Regulation you can visit the website of the Information Commissioner's Office [www.ico.org.uk](http://www.ico.org.uk)

#### **Changes to this OPAL Trust Policy**

This policy was last updated 19th June 2020. We may amend this policy from time to time to take account of changes to our processes or changes to data protection or other legislation. If we make any significant changes to this policy, we will show this clearly on the OPAL Trust website, in our newsletters, or by contacting you directly. By continuing to use our website you will be deemed to have accepted these changes.

If you have any questions, comments, or suggestions about this Privacy Policy, please do not hesitate to contact us at: [info@opaltrust.org](mailto:info@opaltrust.org)