

EVERY MAN - EVERYDAY - EVERYWHERE



## Privacy Policy - May 2018

At CVM Ireland we are extremely grateful for the support we receive through prayers, gifts and time, and we thank God for each of our supporters. We could not carry out our vital work without you.

We are committed to protecting your privacy, and promise to respect your personal information and do all we can to keep it safe. We aim to be clear about how we obtain your details and only process them in ways we believe you would reasonably expect. This includes not selling or sharing personal details with third parties for the purposes of their marketing.

We always aim to communicate with you respectfully, effectively and efficiently. We are legally obliged to use your information in line with the law concerning the protection of personal information included in the General Data Protection Regulation (GDPR) 2018.

Our forms give clear choices and we include information on how to change your communication preferences whenever we contact you. This helps us send you news of our work only if you have explicitly stated you are happy for us to do so in ways that are most convenient to you (email, phone, post).

If you don't want to hear from us, please let us know by contact our office or by emailing [office@cvm.ie](mailto:office@cvm.ie)

### How do we collect information about you?

We collect information in the following ways:

#### When you give it to us DIRECTLY, Actively Opting In, including:

- When you contact CVM Ireland to make a donation, register to receive news about our work, sign up to CVM's online content, or you telephone, email, write to or text us, engage with CVM via social media channels, sign up for one of our events, register as a partnered group or order our resources online.
- When you attend a meeting or an event, fill out a questionnaire, or have a conversation with us and provide us with information about yourself.

#### When you give it to us INDIRECTLY

For example, your information may be shared with us by independent fundraising sites such as JustGiving, Stewardship or CAF when you give a gift. These organisations will only do so with your consent if you have indicated that you wish to support CVM. You should check their Privacy Policy when providing your information to understand fully how they will process your data.

#### When other organisations have permission to share or it is available PUBLICLY

The information we get from other organisations may depend on your privacy settings or the responses and permissions you give, so you should check them regularly.

This information comes from the following sources:

##### *Social Media*

Depending on your settings or the privacy policies for social media and messaging services like Facebook, WhatsApp or Twitter, we might have permission to access information from those sources. We will not add this information to your personal details.

*Other information that is available publicly*

This may include information found in publicly available sources such as Companies House, LinkedIn, the Charity Commission, Companies House, grant-making trusts and Government websites, biographical directories and information that has been published in reputable media.

### **When we collect information as you use our website:**

Like most websites, we use 'cookies' to help us make our site, and the way you use it, better. Cookies are small text files that sites transfer to your device (computer, phone or tablet) and make interacting with a website faster and easier – for example, by automatically filling in your name and address in text fields.

CVM Ireland may store information about you and your activity in cookies. If you want to delete any cookies that are already on your computer, please refer to the instructions for your file management software to locate the file or directory that stores cookies.

If you wish to restrict or block web browser cookies that are set on your device, you can do this through your browser settings; the Help function within your browser should tell you how. Alternatively, you may wish to visit [www.aboutcookies.org](http://www.aboutcookies.org) which contains comprehensive information on how to do this on a wide variety of desktop browsers.

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

If you support us — for example, make a donation, sign up to receive news of our work, volunteer, take part in an event, register as part of our Network or order our resources — we will usually collect:

- Your name
- Your contact details, including postal address, email, telephone numbers, along with your preferences as to which of these we should use to contact you in the future
- Your date of birth if on our speakers list
- Bank account details if you make a regular donation by direct debit or standing order
- Debit or credit card details used to donate to us or when ordering resources – this could be online, over the phone or by mail. We will process your information securely and in accordance with the Payment Card Industry Standards. Your details are only used to complete the transaction requested; we do not store your debit or credit card details. If you have provided them physically, they are securely destroyed once your donation or payment has completed
- Your Gift Aid status
- Your position within an organisation or charitable trust (if relevant)
- Other personal information or sensitive data you share with us, such as your family information, denomination, and your home church, and any appropriate health issues you may have told us about that will help us communicate with you in the most appropriate way (eg, large print).

## **How do we use this information?**

The information we gather helps us to send you what you want when you want it, to fulfil orders for resources, and send you updates and information about our work. It also helps us to shape our fundraising activities to ensure that our communication is relevant and timely and provides you with a good experience of supporting CVM Ireland.

We will use your personal information to:

- Provide you with the information, resources or services you have requested
- Keep you up to date with the work you are supporting and to ask for financial and non-financial support
- Administer your donation, including processing Gift Aid
- Ensure we know how you prefer to be contacted

- Keep a record of your correspondence, donations history, questions you have asked us, or comments or complaints you have made
- Understand how we can improve your supporter experience based on your interests and interaction with us
- Understand how we can improve our services, and the resources or information we send out
- Contact you in your capacity as a representative of an organisation such as a church, school, business or charitable trust
- Ensure that potentially vulnerable people are treated appropriately, particularly with regard to financial giving and legacies
- If you make a substantial gift to our work, we may contact you to thank you and to discuss how you might want to develop your interest in 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.**

## Legal bases for processing your data:

### Consent

From May 2018, we will process any new supporters' data based on the consent you have given us.

### Legitimate interest for existing supporters

If you have received communications from us over the past year since January 2017, we will use your support for us over this period as a legitimate interest reason to continue sending 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.

### Legitimate interest for potential supporters

We would use any information we gather to help us plan an appropriate approach, such as a meeting or an event invitation, where we could share further information about CVM and explore your interest and opportunities for support.

### Opting out

You can change or stop what you receive from us by following the instructions at the bottom of any postal communication, website or email, or you can contact us by phone at any time.

## Protecting your personal information

The security of your information is very important to us. We ensure that there are appropriate controls and procedures in place to protect your personal details. For example, information you submit on a physical form or when filling out online forms is encrypted and stored on a secure server. We also use encryption and secure servers when you make a donation via our website.

However, despite all the security and protection we put in place, the Internet cannot be guaranteed to be 100% secure. Therefore, you submit data at your own risk. We undertake regular reviews of who has access to information we hold to ensure that your details are only accessible by appropriately trained and authorised staff.

Your information may occasionally be passed to service providers that perform functions on our behalf, such as sending postal mail and email or analysing data. These companies may only use your information to perform these functions and may not use it for any other purposes. We carry out comprehensive checks on these companies before we work with them and put a contract in place that sets out our expectations and requirements, especially regarding how they manage the personal data they have collected or to which they have access. They are required to destroy this information once the function for which it has been transferred has been carried out.

If required, we may need to disclose your details to the police, regulatory bodies or legal advisors.

Due to the nature of servers and cloud-based storage all over the world, this may mean that, during the processing of your data, it leaves the European Economic Area (EEA). Although they may not be subject to the same data protection laws as in the UK, we will take steps to make sure they provide an adequate level of protection in accordance with UK data protection law. By submitting your personal information, you are agreeing to this potential transfer, storing or processing at a location outside the EEA.

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

## Keeping your information up to date

When possible, we use publicly available sources to keep your records up to date and accurate. We also take appropriate measures to ensure that information is only kept for as long as is necessary and only for the purpose for which it was given. We will also only use it when regulations permit us to do so. However, we would really appreciate it if you let us know if your contact or personal details change, as this gives us consent to use the updated information and continue to communicate with you.

### How long we will keep your information for:

- We will hold your personal information on our systems for as long as is necessary to carry out the activity relevant to your interaction with us. We will keep a record of any donations you have made for at least seven years
- Legacy gifts are vital to our work. We may keep information provided by you or your solicitor indefinitely, both to administer the gifts and to communicate with the families of people leaving 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.
- Disposal of personal data will be conducted according to correct practice and procedures.

## Right of access

If you want to access your information you should make the request in writing to the CVM Data Protection Officer, using the standard letter which is available online from [www.ico.gov.uk](http://www.ico.gov.uk). We do not accept these requests by email.

Please address all correspondence to:

FAO: The Data Protection Officer  
CVM Ireland  
9 - 11 Hightown Avenue  
NEWTOWNABBEY  
BT36 4RT

If you have any questions, please contact The Data Protection Officer 028 9084 3058 or [office@cvm.ie](mailto:office@cvm.ie) or for further information, see the Information Commissioner's guidance at [www.ico.org.uk](http://www.ico.org.uk)

## Changes to this notice

We may change this Privacy Notice from time to time. If we make any significant changes in the way we treat your personal information, we will make this clear on the CVM Ireland website and/or by contacting you directly.