



DATA PROTECTION - PRIVACY POLICY

INTRODUCTION

The International Miners' Mission (otherwise known as The Glynn Vivian Miners Mission Incorporated 1906) is a Christian mission agency currently working in 12 countries around the world.

IMM values everyone who engages with us by whatever means, and we do all we can to protect your privacy and to make sure the personal data you provide us is kept safe.

Our Vision is to "Introduce Miners to the Master". Our Values are to follow Jesus Christ; to work relationally; to work through other agencies and/or churches and focus on reaching out to miners and their communities; to serve with humility and to pursue beauty, goodness and truth

Our Purpose is together to follow God's call responding to human suffering and graduating communities from extreme poverty.

This policy has been produced to address the requirements of GDPR which came into force on May 25th 2018. It explains how we collect data, how we use and store information and what it means for you. We also have specific **Terms and Conditions** for the use of our website, which you should read as well.

We treat all our supporters in line with our beliefs and we welcome any feedback on any of our actions. Just write to our Registered Address (as shown below) or email dshilltoe@minersmission.com

WHO WE ARE

IMM is a Christian charity involved in all aspects of reaching miners and their communities with the Good News of the Lord Jesus Christ. We are a charity registered in England and Wales (number 90484). Our company number is 221853 and our Registered Office is 5 Old Rectory Court, 61 Wood Street, Barnet, EN5 4BL

For the purposes of this Policy, 'us', 'we' and 'our' refer to IMM.

WHAT INFORMATION DO WE COLLECT?

Directly with us

We collect personal information each time you deal with us, For example when you make a donation, request materials or information, sign up for an event, provide comments, complete surveys or otherwise provide your personal details we collect the information you provide.

From website interaction with us

We collect non-personal data such as IP addresses, details of pages visited and files downloaded. Website usage information is collected using cookies, see the section on Cookies below.

Indirectly from 3rd parties

We collect information from 3rd parties such as event organisers or fundraising sites like give.net, where you have agreed to support IMM and have given your consent. You may wish to check their privacy policy to find out more information on how they will process your data.

Where you give your permission to other organisations

We may collect information that you make available on, for example, Twitter, Facebook, LinkedIn or similar organisations. You may wish to check their privacy policy to find out more information on how they will process your data.

From publicly available data

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

Sensitive data

Where you provide the information, we may collect sensitive personal data, including, but not limited to, your religious beliefs, or your physical or mental health.

WHAT DO WE DO WITH IT?

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;
- Ask for financial and non-financial support, such as volunteering or prayer;
- Process donations you give us, or to support your fundraising for us, including gift aid;

- Provide information or packs, for example Church packs you have requested;
- Provide a personalised service, such as customised website content or personalised emails;
- Keep records of your relationship with us eg. questions you have asked or complaints you have made;
- Classify supporters by location, for example Scotland, Northern Ireland or Wales;
- Analyse the personal information we collect about you and use publicly available information to aid our understanding of our supporters, understand the level of potential donations, profile supporters into categories and to help provide the right information at the right time to the right supporters; and
- Conduct market research to aid our understanding of our supporters and their views.

We may use publicly available information such as newspaper articles, or information you have given permission to other organisations to share such as LinkedIn, to identify supporters and non-supporters, including trustees, who have expressed an interest in giving major gifts or having a public profile with charities like IMM.

If you make a major gift to our work, and where you agree to such a relationship with us, one of the staff will discuss and agree with you any sensitivities you may have about the personal data we hold and the methods of contact suitable for you. We will do this at the earliest convenient opportunity. Where you do not wish to pursue such a relationship with us, we will not retain any additional publicly sourced personal data about you we have used for this purpose.

Basis of processing your data

- **Consent:** If you are a new supporter coming on board for the first time, on or after 25th May 2018, we will process your personal data on the basis of the consent you provided us with. You are free to change your preferences at any time by contacting us by telephone, post or email as shown in the section 'Your choices and telling us when things change' below.
- **Legitimate interest:** Contacting you; If you are an existing supporter as at 25th May 2018 we may continue to contact you by email where you have previously given us your consent. We may also contact you by post or telephone where we have a legitimate interest to do so. For example, where you have previously made a donation to IMM we may continue to send you information about the work your donation is making possible or other work we may wish to do. Where you have previously asked us not to contact you in this way we will continue to respect your contact preferences. 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 below
- **Legitimate interest :** Contacting the right supporters at the right time; When you make a donation, a series of donations, express an interest in our work, or show a potential 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 a member of staff and to ensure we use our supporter's money in the most effective ways.

Applying for a job or volunteering with us

Where you provide personal data and sensitive personal data when applying for a job 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;
- Provide anonymised data to monitor compliance with our equal opportunities policy.

Where you provide personal or sensitive personal data, such as dietary, mobility requirements or health information, to volunteer or travel on a trip with us we will store, process and disclose the personal information we collect to:

- Deliver the volunteering opportunity, including the disclosure of sensitive data, such as medical information, to our partner(s) where necessary to deliver a safe trip or event for all involved;
- Provide information including fundraising materials
- Provide the administration of these events or opportunities to serve;
- Monitor the quality of the volunteering opportunity or trip provided;

- Answer any questions or feedback you may have;
- Provide anonymised data to monitor compliance with our equal opportunities policy.

HOW AND WHERE WE STORE YOUR INFORMATION

How long?

We will keep your personal information only for as long as we consider it necessary to carry out each activity.

We have a data retention policy to implement this. We take account of legal obligations and accounting and tax considerations as well as considering what would be reasonable for the activity concerned.

For example, we will retain details of donations for 7 years to meet tax and accounting requirements, but we will only hold sensitive medical personal information provided to participate in an overseas trip until the trip is completed.

Legacy income is an important source of income for our beneficiaries. We may keep data you provide indefinitely to carry out the administration of legacies and to communicate with the families of those leaving us legacies.

If you have any questions about our Data Retention Policy, please contact us in writing at

Hon. General Secretary
International Miners' Mission
5 Old Rectory Court
61 Wood Street
Barnet
EN5 4BL

Or email to: dhillitoe@minersmission.com

Security

We ensure that we have in place appropriate technical controls in place to protect any personal data you provide. For example, we ensure that any online forms are encrypted and our network is protected and routinely monitored.

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.

We may make limited use from time to time of external companies to collect or process personal data on our behalf. When we do so, we carry out checks on these companies, put in place contracts to make sure our requirements are clear, and carry out periodic reviews. When we do use external companies, we remain responsible for the storing and processing of your personal data.

However, we need to remind you that despite all our efforts, the internet cannot be guaranteed to be 100% secure, and that you submit data at your own risk.

Credit / debit card security

If you use your debit or credit to donate to us, purchase something or pay for a trip, whether online, 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 and for reconciling standing orders that we receive.

Where we store your personal information

We use cloud based systems to process data and therefore data may be processed outside of the European Economic Area (EEA). We adopt the Information Commissioners approved measures and therefore ensure that personal data is held in compliance with European data protection regulations. 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 transfer, storing and processing of your information.

Should you travel overseas with us, we may share personal information with partners who deliver our work in overseas locations. For example, this may include sensitive personal data such as medical information. When we do so we will make you aware of the data being transferred and seek your consent to do so.

WHEN WE SHARE YOUR INFORMATION

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 fulfilling orders or 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.

COOKIES

What are Cookies?

We collect data using cookies. 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.

The use of cookies is an industry standard for most major websites. You can find more information about cookies by follow these [two links](#).

IMM's use of cookies on our website

To enjoy the IMM website to the full, we recommend that you leave cookies turned on. If you turn off cookies then you may not be able to enter parts of the site.

The cookie data that we collect we may use to:

- customise the content on our website and to help to understand visitor's current and future needs
- process any requests, applications or transactions you may make
- aid internal administration and analysis

Managing cookies

Most browsers allow you to turn off the cookie function. To do this you can look at the help function on your browser.

Third party cookies

IMM works with a number of third party suppliers who set cookies on our website to enable them to provide us with services. These are mainly used for reporting and advertising purposes so we can improve the way we communicate.

We use websites such as YouTube and Vimeo to embed videos and you may be sent cookies from these websites. We do not control the setting of these cookies, so we suggest you check the third-party website for more information about their cookies and how to manage them.

FHUK also uses third party suppliers such as Facebook, Google Analytics and these providers may use cookies. They may also use tracking pixels, which are commonly found in advertising to track the effectiveness of adverts.

As some of these services may be based outside of the UK and the European Union, they may not fall under the jurisdiction of UK courts. If you are concerned about this you can change your cookie settings (see above) and can find more information about this [here](#).

HOW WE TREAT CHILDREN AND VULNERABLE PERSONS

Aged 12 or under

We do not actively seek to collect children's data, and are most likely to do so when children are travelling on a trip with their parents' or guardian. If at any time we create any materials which may lead to someone aged 12 or under providing their details, we make it clear that they should make sure that they have your parent's /guardian's permission first, before giving us their personal information.

Supporters in vulnerable circumstances

We recognise the importance of identifying and supporting supporters in vulnerable circumstances. Staff who send or respond to supporter emails, mailings or calls are trained to be aware of, to identify signs of vulnerable circumstances and to deal with the supporter appropriately. Personal information will be recorded so that we may respond appropriately in future, for example by ceasing fundraising requests or no longer making calls.

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:

Email us on: dshillitoe@minersmission.com

Write to us at

Hon. General Secretary
IMM
5 Old Rectory Court
61 Wood Street
Barnet
EN5 4BL

Updating your details

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

We may use Post Office address search, postcode lists or other available sources to confirm data that you provide us with, where, for example, we are unsure of what you have completed on a form.

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; nor will we automatically update changes of address, we will normally only update your address when you tell us it's changed. However, if you are a regular giver, continuing to give regularly, and items such as Walking Together are returned to us, we may use external sources to update your address details so that we may update you on how your money has been spent through our news and stories.

Telling us to stop processing

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:

Hon General Secretary
IMM
5 Old Rectory Court
61 Wood Street,
Barnet
EN5 4BL

ACCESS TO YOUR INFORMATION

Your rights under DPA 1998

You have the right to request details of the information we hold about you. To receive a copy of the personal information we hold please write to our Data Protection Officer at the address given below, enclosing a cheque for £10 made payable to International Miners Mission. We will respond within 40 days of receiving your letter.

For more information about your rights under the Data Protection Act you can visit the website of the [Information Commissioner's Office](#).

CHANGES TO FHUK PRIVACY & SECURITY POLICY

Changes to this Policy

This policy was issued in March 2018. 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 our website, in our publications such as Walking Together or by writing to you directly. By continuing to use our website you will be deemed to have accepted these changes.

Feedback We welcome feedback or questions on this policy or on any of our actions by:

Email us on: dshillitoe@minersmission.com

Write to us at: Hon General Secretary, 5 Old Rectory Court, 61 Wood Street, Barnet, EN5 4BL