



**SOWINGROOTS**

## Privacy Policy

### Your Privacy

Your privacy is important to Sowing Roots (“us”/”we”). We value everyone who gives us their personal data. We do all we can to protect your privacy and to make sure the personal data you provide is kept safe. This Privacy Policy explains what personal data we collect from you, why we collect it, how we collect it, the legal basis by which we process this data and how we protect and store it. It also explains your rights under the General Data Protection Regulations (‘GDPR’). Please read this Privacy Policy carefully and ensure you understand it. This privacy policy can also be found on our website <http://sowingroots.org.uk/>

### 1 Terms

In this Policy, the following terms shall have the following meanings:

**“SR”, “Us” “We” and “Our”**

Means Sowing Roots (Charity number **1201617**). Our registered office is  
32 WESTBURY DRIVE  
MACCLESFIELD  
CHESHIRE  
SK11 8LR  
our email is [chair@sowingroots.org.uk](mailto:chair@sowingroots.org.uk)

**“You / your”**

Means any living individual.

**“Website”**

<http://sowingroots.org.uk/>

**“Personal data”**

Means any information that relates to an identifiable person who can be directly or indirectly identified from that information.

### 2 Your rights

#### 2.1

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data. This Privacy Policy and the way we use your personal data have been designed to uphold these rights:

**2.1.1** The right to be informed about our collection and use of your personal data;

**2.1.2** The right of access to the personal data which we hold about you; You have the right to ask us for copies of your personal information.

**2.1.3** The right to request that we correct any personal data if it is found to be inaccurate, incomplete, or out of date;

**2.1.4** The right to request your personal data is erased where it is no longer necessary for us to retain such data;

**2.1.5** The right to change or withdraw your consent at any time;

**2.1.6** The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller (known as the right to data portability);

**2.1.7** The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;

**2.1.8** The right to object to us using your personal data for particular purposes;

**2.1.9** Rights with respect to automated decision making and profiling; and

**2.1.10** The right to lodge a complaint with the Information Commissioners Office. (See Section 15 below for details).

## **2.2**

If you have any queries, want to exercise the rights above or you wish to complain about how we use your personal data, please contact us in the first instance by emailing [chair@sowingroots.org.uk](mailto:chair@sowingroots.org.uk).

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.

## **3 What does this Privacy Policy cover?**

This Privacy Policy applies to the personal data you supply to us.

## **4 What personal data do we collect?**

We collect the personal data defined by this policy when you subscribe to our mailing list, donate money, request information, volunteer or apply for a job with us, or otherwise provide us with your personal data, including by post, telephone or email.

We may also collect personal data indirectly, for example via accessing a school or Christian community website or from a third party (e.g. another member of staff at the same school provides your contact details).

## **5 How do we use your personal data?**

### **5.1 Our obligations**

SR complies with its obligations under the GDPR by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data for longer than is necessary; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

### **5.2 What is the legal basis for processing your personal data?**

Our processing of your personal data will always have a legal basis, either because you have explicitly consented to our use of your personal data, or because it is necessary to supply you with the services you have requested or is necessary for us to perform a contract with you, or because it is in our legitimate interests. Specifically:

**5.2.1** All personal data collected for our supporter's mailing list requires consent to process so that we can keep you informed about SR news, events, and activities including fundraising activities and appeals;

**5.2.2** Personal data collected for our school's contacts (mailing list) is used in our legitimate interests so that we can keep you informed about SR news, and liaise with you about arranging, SR events, and activities;

**5.2.3** Personal data collected from Christian communities is used in our legitimate interests so that we can keep you informed about SR news, and liaise with you about arranging, SR events, and activities;

**5.2.4** Safeguarding Lead personal data from Christian communities is used with consent;

**5.2.5** Personal data, which includes sensitive personal data e.g. religion, is also collected and processed in the normal course of the recruitment and employment of staff in accordance with normal employment contractual relationships. We also collect personal data from your referees which may include personal sensitive data;

**5.2.6** Personal data relating to both financial supporters and employees is also processed where necessary to meet our legal obligations relating to employment, social security, social protection law, Financial regulation, fraud and other crime:

**5.2.7** Personal data from third parties including but not limited to; financial sites such as PayPal and social media sites such as Facebook, WhatsApp and Twitter. This is where you have independently accessed these third-party suppliers to enable you to interact with us in some way. You should check their privacy policies to ensure you understand and are happy about how they will process your personal data in these circumstances. We will take all reasonable steps to ensure that your personal data collected via third parties will be handled safely, securely and in accordance with your rights, our obligations, and the obligations of the third parties.

### **5.3**

Our data processing activities enable us to:

**5.3.1** Inform you of news, events, and activities;

**5.3.2** Organise and provide services to schools

**5.3.3** Process your gifts and gift aid applications;

**5.3.4** Manage our employees and volunteers;

**5.3.5** Maintain our own accounts and records;

**5.3.6** Ask you for financial and non-financial support, such as volunteering or prayer;

**5.3.7** Administer the recruitment process if you apply to be a volunteer or employee;

**5.3.8** Use third parties to provide services such as references and criminal referencing in connection with your application (DBS checks);

**5.3.9** Provide appropriate support in the event of assistance being requested including in an emergency;

**5.3.10** Where we have a legal right or duty to use or disclose your information (including for financial processing and accounting, crime and fraud prevention);

**5.3.11** Support our safeguarding policy

## **6 How We Protect Your Personal Data?**

Data security is important to us and we take all reasonable steps to ensure that your data is collected, stored and processed securely, whether in electronic or hard copy formats and is protected from unauthorised access, use or disclosure. We ensure that access to personal

data is restricted only to those personnel whose roles require such access and that suitable training is provided for these personnel.

## **7 Where do we store your personal data?**

We store physical data in the UK.

Our website host is GoDaddy.com.

You can access their full privacy policy here: <https://www.godaddy.com/en-uk/legal/agreements/privacy-policy>

Our DBS checks are made through Atlantic Data. Their privacy policy is available here: [https://policydocuments.disclosures.co.uk/Privacy\\_Statement.pdf](https://policydocuments.disclosures.co.uk/Privacy_Statement.pdf)

## **8 Do we share your personal data?**

We do not share your data with third parties for marketing purposes.

We use third parties to process personal data on our behalf. For example, PayPal to receive donations. When we do use third parties we will take all reasonable steps to ensure your personal data is handled in accordance with your rights, our obligations, and the obligations of the third party in law. In this case we remain responsible for the storing and processing of your personal data in accordance with the GDPR regulations. We do not store your credit or debit card details.

We may in certain circumstances such as legal requirements, a government authority or an order of the Court, be legally required to share data held by us which may include your personal data including sensitive personal data.

## **9 How long do we keep your personal data?**

We will keep your personal data only for as long as we consider it necessary to carry out each activity. We also take account of legal obligations and accounting and tax considerations as well as considering what would be reasonable for the activity concerned. We retain personal data about gifts and gift aid declarations for up to 7 years after the tax year to which they relate.

## **10 How can you control your personal data?**

In addition to your rights in section 2 of this Privacy Policy, you can contact us using the details given either in Section 1 or 14 of this Privacy Policy.

You can also contact us there are changes to your personal information.

## **11 Further processing**

If we wish to use your personal data for a new purpose, not covered by this Privacy Policy, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

## **12 External links**

Where links on our website take you to external websites owned by third-parties outside of our control, we accept no responsibility for the content or any damage or loss caused by websites that are not owned or operated by us. Even though we have made every effort to ensure these links are authentic you follow them at your own risk. In addition, the presence of a link does not imply we agree with the content or endorse the provider.

### **13 Third party websites**

We have links via our website to various third-party external websites including social media sharing buttons. You use these at your own discretion and accept that doing so may publish content to your social media profile feed or page. We recommend you check the Privacy Policies of these sites before providing them with your personal data.

### **14 Contact details**

To exercise all relevant rights, queries or complaints please contact us using the following details and we will do our best to assist you. Our registered office is 32 Westbury Drive, Macclesfield, SK11 8LR, and our email address is [chair@sowingroots.org.uk](mailto:chair@sowingroots.org.uk). If we are unable to help, you can lodge an enquiry or complaint with the Information Commissioners Office (ICO), using the details in section 15 below.

### **15 ICO**

You can contact the ICO on 0303 123 1113, <https://ico.org.uk/make-a-complaint/> or by post to the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

### **16 Changes to this Privacy Policy**

SR will change this Privacy Policy periodically to reflect changes in the law or feedback from those who use our services.

Date of first preparation 03/2023

Reviewed and revised 03/2025