Waverton Evangelical Fellowship General privacy notice

This privacy notice tells you what to expect us to do with your personal information.

Date Effective: September 2026

- Contact details
- What information we collect, use, and why
- Lawful bases and data protection rights
- Where we get personal information from
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Contact details

Email data@wefchurch.org

What information we collect, use, and why

We collect or use the following information to **provide services and goods, including delivery and third party referrals**:

- Names and contact details
- Gender
- Addresses
- Date of birth
- Emergency contact details
- Next of kin details
- Photographs or video recordings
- Service use history
- Health information (including medical conditions, test results, allergies, medical requirements and medical history)
- Dietary information (including allergies and health conditions)
- Information about care needs (including disabilities, home conditions, dietary requirements and general care provisions)
- Information about work, home and living conditions
- Information about support requirements
- Criminal offence data
- Records of meetings and decisions
- Payment details (including card or bank information for transfers and direct debits)
- Website user information (including user journeys and cookie tracking)
- Information relating to compliments or complaints

We also collect or use the following special category information to **provide services and goods, including delivery and third party referrals.** This information is subject to additional protection due to its sensitive nature:

- Religious or philosophical beliefs
- Health information

We collect or use the following information to **receive donations or funding and organise fundraising activities**:

- Names and contact details
- Addresses
- Payment or banking details
- Donation history
- Tax payer information (for Gift Aid purposes)
- Gifts in wills
- Visitors to our stores and website

We also collect or use the following special category information to **receive donations or funding and organise fundraising activities.** This information is subject to additional protection due to its sensitive nature:

- Religious or philosophical beliefs

We collect or use the following personal information for **service updates or marketing purposes**:

- Names and contact details
- Marketing preferences
- Records of consent, where appropriate

We also collect or use the following special category information **for service updates or marketing purposes.** This information is subject to additional protection due to its sensitive nature:

- Religious or philosophical beliefs

We collect or use the following personal information to **comply with legal requirements**:

- Name
- Contact information
- Financial transaction information
- Any other personal information required to comply with legal obligations
- Health and safety information
- Safeguarding information
- Criminal offence data

We also collect or use the following special category information to **comply with legal requirements.** This information is subject to additional protection due to its sensitive nature:

- Religious or philosophical beliefs

- Health information

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Address
- Video recordings of public areas
- Witness statements and contact details
- Relevant information from previous investigations
- Financial transaction information
- Information relating to health and safety (including incident investigation details and reports and accident book records)
- Correspondence

We also collect or use the following special category information for **dealing with queries, complaints or claims.** This information is subject to additional protection due to its sensitive nature:

- Religious or philosophical beliefs
- Health information

Lawful bases and data protection rights

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO's website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. Read more about the right of access.
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. Read more about the right to rectification.
- **Your right to erasure** - You have the right to ask us to delete your personal information. Read more about the right to erasure.

- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. Read more about the right to restriction of processing.
- **Your right to object to processing** - You have the right to object to the processing of your personal data. Read more about the right to object to processing.
- **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. Read more about the right to data portability.
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. Read more about the right to withdraw consent.

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide services and goods, including delivery and third party referrals** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
    - We collect and use personal information to organise and deliver church services, groups, events, and pastoral activities. This includes managing attendance, coordinating group sign-ups, communicating event details, and providing pastoral support to our congregation and wider community. Processing this information is necessary to run an effective church community and to ensure members and attendees receive relevant information about services, groups, and events they participate in. Without

this data, we would be unable to organise activities, respond to pastoral needs, or maintain accurate records of who is involved in specific groups or ministries. The benefits of this processing include enabling smooth coordination of church life, ensuring safeguarding and pastoral care needs are met, and allowing members to stay informed about activities relevant to them. We only collect information that is proportionate to these purposes and limit access to those who need it to fulfil their roles within the church. We have considered the impact on individuals and believe this processing does not cause undue risk of harm, since the information is used solely to support participation in voluntary church activities that people have chosen to engage with. Individuals can opt out of specific communications or activities at any time, and we do not use this information for purposes unrelated to church life without separate consent.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

- Vital interests – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.

Our lawful bases for collecting or using personal information to **receive donations or funding and organise fundraising activities** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
    - We collect and use personal information to receive donations, administer giving (including Gift Aid where applicable), and organise fundraising activities in support of our church\'s mission and community work. This includes recording who has given, managing giving records, and

communicating with supporters about fundraising campaigns or specific appeals. Processing this information is necessary to maintain accurate financial records, ensure donations are properly acknowledged, and enable us to run effective fundraising activities that sustain our church\'s ministries and services to the community. Without this data, we would be unable to track donations accurately, provide donors with confirmation of their giving, or organise fundraising campaigns that rely on knowing who has previously supported us. The benefits of this processing include enabling Waverton Evangelical Fellowship to continue its charitable and pastoral work, ensuring transparency and accountability in how funds are managed, and allowing supporters to stay connected with causes and activities they care about. We only collect information that is proportionate to these purposes, such as names, contact details, and donation records, and we do not use this data for purposes beyond donation administration and fundraising communications without separate consent. We have carefully considered the impact on individuals and believe this processing does not cause undue risk of harm, since donors have chosen to support our church voluntarily and can request to stop receiving fundraising communications or ask us to delete their information at any time, subject to our legal record-keeping obligations. We do not share donor information with third parties for their own marketing purposes, and we take appropriate security measures to protect all donation-related data

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for **service updates or marketing purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
    - We collect and use personal information to send essential service updates to members and attendees of Waverton Evangelical Fellowship, such as changes to service times, event cancellations, or important announcements affecting activities people have already engaged with through our church. Processing this information is necessary to keep our congregation and wider community informed about changes or updates

directly relevant to their participation in church life. Without this data, we would be unable to notify people promptly about changes that affect their attendance or involvement in specific services, groups, or events. The benefits of this processing include ensuring people are not inconvenienced by unexpected changes, supporting smooth coordination of church activities, and maintaining trust with our congregation through timely and relevant communication. We only use this information for updates that individuals would reasonably expect to receive given their existing relationship with the church, and we do not use it for unrelated promotional purposes without separate consent. We have considered the impact on individuals and believe this processing does not cause undue risk of harm, since the communications are limited to essential, service-related updates rather than general marketing. Individuals can request to stop receiving these updates or ask us to review how their information is used at any time, and we ensure the frequency and content of these communications remain proportionate and relevant to their engagement with Waverton Evangelical Fellowship.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information to **comply with legal requirements** are:

- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- **Legal obligation** – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- **Legitimate interests** – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
    - We collect and use personal information to respond to queries, investigate complaints, and handle claims raised by members of our congregation, donors, or the wider community. This includes recording the details of the query or complaint, any correspondence exchanged, and information needed to properly investigate and resolve the matter. Processing this information is necessary to ensure we can respond effectively to concerns raised with us, maintain fair and transparent complaint-handling practices,

and address any issues that affect our relationship with members, donors, or the public. Without this data, we would be unable to properly investigate complaints, communicate outcomes, or take appropriate action to resolve queries or claims raised against us. The benefits of this processing include enabling us to maintain trust and accountability within our church community, ensuring people who raise concerns are heard and receive a fair response, and helping us identify and address any recurring issues that could affect the wellbeing of our congregation. We only collect information that is proportionate and relevant to resolving the specific query, complaint, or claim, and we limit access to those directly involved in handling the matter. We have carefully considered the impact on individuals and believe this processing does not cause undue risk of harm, since it is limited to what is necessary to investigate and resolve the matter fairly. Anyone raising a query or complaint would reasonably expect us to process their information for this purpose, and we handle all such matters with appropriate confidentiality and care, particularly where sensitive or pastoral issues are involved.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

- **Vital interests** – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.

Where we get personal information from

- Family members or carers
- Charities or voluntary sector organisations

How long we keep information

Our general rule is to keep data no longer than necessary. Where you continue to actively engage with our church services, activities and events, we will retain the appropriate data for you so that we can best serve your involvement. We operate an annual process of review, by which we assess who is actively engaging in church life, and where this is not the case, we will remove your data.

Additionally:

- We will keep some records permanently if we are legally required to do so. For example, this covers wedding registers and some safeguarding records.

- We may keep some other records for an extended period. For example, gift aid records, and it is current best practice to keep financial records for a minimum period of seven years to support HMRC audits.

- Matters of factual record will be kept indefinitely. For example, this covers meeting minutes, register of members, governing documents etc., for the purpose of archiving in the public interest, scientific or historical research, or statistical purposes, in accordance with Article 89(1) of UK GDPR, and subject to safeguards for individuals' rights.

For more information on how long we store your personal information or the criteria we use to determine this please contact us using the details provided above.

Who we share information with

Data processors

ChurchSuite - Church management software \/ customer relationship management (CRM) provider for religious organisations

This data processor does the following activities for us: ChurchSuite processes and stores personal information on our behalf to manage personnel records for staff, volunteers, and members; administer event ticketing and room bookings; and record and manage donations.

Google Workspace (provided by Google Ireland Limited \/ Google LLC), a cloud computing, email, and productivity software provider based in Ireland\/United States.

This data processor does the following activities for us: Google Workspace processes and stores our email communications and files, including correspondence with members, donors, volunteers, and the wider community, as well as documents and records we create and store using Google\'s productivity tools

Others we share personal information with

- Charities and voluntary organisations
- Organisations we need to share information with for safeguarding reasons
- Emergency services
- Legal bodies or authorities
- Relevant regulatory authorities
- External auditors or inspectors
- Organisations we're legally obliged to share personal information with
- Publicly on our website, social media or other marketing and information media

Sharing information outside the UK

Where necessary, our data processors may share personal information outside of the UK. When doing so, they comply with the UK GDPR, making sure appropriate safeguards are in place.

For further information or to obtain a copy of the appropriate safeguard for any of the transfers below, please contact us using the contact information provided above.

Organisation name: Google LLC (United States), operating under Google Ireland Limited\'s contractual arrangements and the UK Extension to the EU-U.S. Data Privacy Framework, with data transferred internationally as part of Google Workspace\'s global cloud infrastructure.

Category of recipient: Cloud computing and technology services provider (email, file storage, and productivity software)

Country the personal information is sent to: United States
How the transfer complies with UK data protection law: Addendum to the EU Standard Contractual Clauses (SCCs)

How to complain

If you have any concerns about our use of your personal information, you can make a data protection complaint to us:

Email: data@wefchurch.org

Post: Waverton Evangelical Fellowship Eggbridge Lane Waverton Chester CH3 7PE United Kingdom

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113
Website: https://www.ico.org.uk/make-a-complaint