

DATA, WEBSITE PRIVACY AND COOKIES POLICY | THE BRIDGE AT WATERLOO AND ST JOHN'S WATERLOO

LAST REVIEW: MARCH 2023

1. Your personal data – what is it?

“Personal Data” is any information relating to an identified or identifiable natural living person, commonly referred to as the ‘data subject’. Identification can be by the information alone or in conjunction with any other information that the data controller may possess or be likely to obtain. The processing of personal data is governed by the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

2. Who are we?

The PCC of the Ecclesiastical Parish of Waterloo (St John's, Waterloo) is the data controller for data relating to St John's Waterloo. The Board of The Bridge at Waterloo (TBAW) is the data controller for data relating to TBAW and the Waterloo Festival. This means that they decide how your personal data is processed and for what purposes. They are responsible to you for how we process your data.

3. How do we process your personal data and what is the legal basis of processing your data?

The data controllers will comply with their legal obligation to keep personal data up to date; to store and destroy it securely; to not collect or retain excessive amounts of data; to keep personal data secure; to protect personal data from loss, misuse, unauthorised access and disclosure; and to ensure that appropriate technical measures are in place to protect personal data.

We use your personal data for some or all of the below purposes.

As a visitor:

- To send you communications which you have requested and that may be of interest to you. These may include our newsletter, and information about campaigns, events and other fundraising activities (by email and/or hard copy).
- To process photos taken of you, with your consent, which we may use to publicise our activities.
- Our premises have CCTV cameras which capture digital images, which constitutes processing under the lawful basis of legitimate interests for security purposes.

- If you login to our Wi-Fi, we will capture information from your personal electronic device which is required as part of our terms of service.

Our website uses cookies to capture user information which is used to optimise the service we provide to you.

As a participant in one of our events including the Waterloo Festival:

- Where you are enquiring about or participating in one of our events such as a concert, workshop, course or open day we will process your contact information and other personal information relating to the event for administrative purposes which constitutes processing necessary for legitimate interests.
- We may also ask your consent to collect and process sensitive data anonymously for statistical purposes.

As a user of a church building:

- Where you are enquiring about or using our buildings, we will process your contact information and payment information under the lawful bases of legitimate interest, or, in cases where you hire our facilities, contractual necessity.

4. Sharing your personal data

Your personal data will be treated as strictly confidential. It will only be shared with third parties where it is necessary for the performance of our tasks or where you give us your prior consent.

It is likely that we will need to share your data with some or all of the following (but only where necessary):

Staff of St John's Waterloo and The Bridge at Waterloo (TBAW) in order to carry out a service where it is in the legitimate interest of St John's Waterloo. For example, sharing contact details to facilitate management of events and room bookings.

We use the following commercial providers:

- Mailchimp.com to send out weekly updates and newsletters on behalf of St John's Waterloo, TBAW and the Waterloo Festival, and to maintain our marketing and communications database.
- Hallmaster.co.uk, who provide TBAW with the service to allow the management of our room booking system, invoicing, and customer database.



- People's Fundraising.com who provide the service with several ways to make donations or fundraising for St John's Waterloo or our supported organisations.
- Paperform.co for generating forms like volunteer expression of interest forms or booking request forms.
- Eventbrite.co.uk for ticketing and processing payments for events organised by St John's Waterloo, the Waterloo Festival and TBAW.
- The Events Calendar, for ticketing and a calendar for events at St John's, the Waterloo Festival and to promote events by outside organisations.

Each of the above providers have their own Privacy policies and details can be found by clicking the links below.

To view MailChimp's Privacy policy, click [here](#).

To view Hallmaster's Privacy policy, click [here](#).

To view People's Fundraising's Privacy policy, click [here](#).

To view Paperform's Privacy policy, click [here](#).

To view Eventbrite's Privacy policy, click [here](#).

To view The Events Calendar Privacy policy, click [here](#).

In accordance with our Diocesan Safeguarding Policy "A Safe Church" personal data relating

to safeguarding may be shared confidentially between the Parish Safeguarding Officer and the Diocesan Safeguarding team. <http://southwark.anglican.org/safeguarding/diocesan-policies-and-procedures>

5. How long do we keep your personal data?

We keep data in accordance with the guidance set out in the guide "Save or Delete: the Care of Parish Records" which is available from the Church of England website at <https://www.churchofengland.org/more/libraries-and-archives/records-managementguides>. We will only keep data for as long as we need it, however we may keep some records permanently if we are required to do so.

Where we no longer need to process your personal data for the purposes set out in this Privacy Notice, we will delete your personal data from our systems.

6. Your rights and your personal data

To exercise your rights, please send your request to us in writing (using the contact details below). When exercising your rights listed below, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights:

- The right to access information we hold on you
- The right to correct and update the information we hold on you
- The right to have your information erased: In the case that you request that we erase the data we hold, we will confirm whether the data has been deleted or the reason why it cannot be deleted (e.g., because we need it for our legitimate interests or a regulatory purpose).
- The right to object to processing of your data.
- The right to data portability.
- The right to withdraw your consent to the processing at any time for any processing of data to which consent was sought.
- The right to object to the processing of personal data where applicable.
- The right to lodge a complaint with the Information Commissioner's Office.

6. Transfer of Data Abroad

Any electronic personal data transferred to countries or territories outside the European Economic Area (EEA) will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the European Union. Our website is also accessible from overseas so on occasion some personal data may be accessed from overseas. We take all reasonable steps to ensure that your personal data is processed securely and will only transfer your personal data outside the EEA where it is compliant with applicable data protection legislation and the means of transfer provides adequate safeguards in relation to your personal data.

8. Further processing

If we wish to use your personal data for a new purpose, not covered by this Privacy & Cookies Notice, 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.

9. Cookies and Third-Party Data

St John's Waterloo works with (or may in the future work with) analytics service providers and other vendors to provide us with information regarding traffic on the Service, including pages viewed and the actions taken when visiting the Service; to serve your experience on our websites, within mobile apps and elsewhere online; and to provide us with information regarding the use of the Service and the effectiveness of our site. Our service providers may collect certain information about your visits to and activity on the Service as well as other websites or services, they may set and access their own tracking technologies on your device (including cookies, web beacons and Embedded Scripts). Some of these parties may collect Personal Information when you visit the Service or other online websites and services. We may also share certain Non-Identifying Information with these parties, including Hashed Information, in connection with the services they provide to us.

St John's Waterloo and its partners use cookies or similar technologies to analyse trends, administer the website, track users' movement around the website, the desktop app, and the mobile app, and to gather demographic information about our user base as a whole. The technology used to collect information automatically from St John's Waterloo Users may include the following:

- Cookies:** Like many websites, we and our partners, affiliates, analytics, and service providers use "cookies" to collect information. A cookie is a small data file that we transfer to your computer's hard disk for record-keeping purposes. We use both persistent cookies that remain on your computer or similar device (such as to save your registration ID and login password for future logins to the Service and to track your compliance with the St John's Waterloo Terms of Service) and session ID cookies, which expire at the end of your browser session (for example, to enable certain features of the Service, to better understand how St John's Waterloo Users interact with the Service and to monitor aggregate usage by St John's Waterloo Users and web traffic routing on the Service). You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functionality of the Service.
- Web Beacons:** We and our partners, affiliates, analytics, and service providers may also employ software technology known as "web beacons" and/or "tracking tags" to help us keep track of what content on our Service is effective and to serve relevant advertising to you. Web beacons are small graphics with a unique identifier that may be invisible to you, and which are used to track the online activity of Internet users. Web beacons are embedded in the web pages you review or email messages you receive. Web beacons or similar technologies may be used for a number of purposes, including, without limitation, to count visitors to our Service, to monitor how Upwork Users navigate the Service, to count how many emails that were sent were actually opened, or to count how many particular articles or links were actually viewed.

- **Embedded Scripts:** We and our marketing partners, affiliates, analytics, and service providers may also employ software technology known as an Embedded Script. An Embedded Script is programming code that is designed to collect information about your interactions with the Service, such as the links you click on. The code is temporarily downloaded onto your computer or other device and is deactivated or deleted when you disconnect from the Service.

In addition, we and our partners, affiliates, analytics, and service providers may use a variety of other technologies (such as tags) that collect similar information for security and fraud detection purposes, and we may use third parties to perform these services on our behalf.

St John's Waterloo Google Analytics collects the following information:

- Number of users
- Session statistics
- Approximate geolocation
- Browser and device information

9. Contact Details

Please contact us if you have any questions about this Privacy & Cookies Notice or the information we hold about you or to exercise all relevant rights, queries or complaints at: The Data Controllers, St John's Church, Waterloo Rd, Lambeth, London SE1 8TY, or email: admin@stjohnswaterloo.org

If you are unhappy with how your personal data has been processed, you have the right to lodge a complaint with the Information Commissioners Office at any time. You can contact the Information Commissioners Office on 0303 123 1113 via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.