

Who are we?

We are Crossover Brighton, registered charity number 1153475, hereinafter referred to as "we" or "us" or "our" or "Crossover Brighton"

Collecting Personal Information

We are committed to protecting your personal information and being transparent about what we do with it, no matter how you interact with us. We respect any personal data you share with us. We aim to be clear when we collect your personal data and not do anything you wouldn't reasonably expect. This applies to you whether you want to join our team full-time, receive ministry training, volunteer, advocate for us, donate, attend our events, want information or want to learn more about what we do as you will have contacted us through contact forms, payment forms or online applications.

Please read this Privacy Notice carefully to understand our practices regarding your personal data and how we will collect, use and store your personal data. We may update this Privacy Notice from time to time so please check it regularly.

Understanding Who Controls Your Data

This Privacy Notice applies when we are acting as the Data Controller with respect to the personal data we process about you. In other words, where we determine the purpose and the means of the processing, we are identified as the Data Controller and we are responsible for controlling and safeguarding your personal data.

To that end, we have assigned a data privacy manager to superintend all aspects of this Privacy Notice, ensuring your questions are answered and your rights are respected. If you have questions, you should contact the data privacy manager, see below for contact details.

Data Privacy Manager

Crossover

Holmsted Manor

Staplefield Road

Cuckfield

West Sussex

RH17 5JF

ENGLAND

Email: crossover@holmsted.org.uk

Phone: 01444 440 229

Use of your personal information

We collect and use your personal information to deliver the services and communications that you have requested and to operate the Crossover Brighton website. We also use your personally identifiable information to inform you of other products or services available from us and any relevant affiliates. We may collect your data through direct interaction, automation or third parties. Here's more information about the methodologies:

- Direct interactions. We may receive your information when you:
 - email us or speak to us on the telephone
 - request information to be sent to you
 - provide us feedback
 - interact with us via various social media platforms
- Automated technologies or interactions. When you use our website or log in to our services we may learn technical data about your computing system and browsing activity. This data is gathered by employing cookies and related tools.
- Third parties. Your personal data may be received via a third party as follows:
 - From service providers we use, including companies such as:
 - Stewardship to process payments
 - Gmail to communicate with you
 - Social Media platforms such as Facebook, Instagram, Youtube for collaboration and advertising purposes

To learn more about the cookies that are utilised on this site please refer to our cookie notice.

How We Process Your Data

We will only process your data according to the allowance permitted by law. In most instances, we will only use your data in the following situations:

- When you have provided your consent to us using your personal data for a specific purpose, which may be revoked by you at any time and for any reason;
- It is necessary for compliance with a legal obligation or regulatory action to which we are subject
- It is within our legitimate interests;
- When we have a legitimate interest in providing useful reports and feedbacks to members in an anonymous form;

Information that We Collect About You and the Lawful Basis for Processing

We may collect information about you as shown below. We may also process, store, transfer or modify data that has been grouped together.

In the following table, we describe ways your personal information may be used; each of these uses are tied to a legal basis for processing. Further, we have also outlined wherever we have a legitimate interest to process your data where appropriate.

It is also possible that we may process your personal information via more than one lawful basis depending upon the purpose for which we are using it. If you have questions about the lawful basis by which we are processing your data, please contact us at: crossover@holmsted.org.uk

Sometimes we aggregate data such as statistical metrics or demographic information stemming from your personal data. It should be noted that statistical and demographic data is not personal data when it does not directly or indirectly reveal your identity. Only when statistical data is combined with personal data will this Privacy Notice apply.

Crossover Brighton does not sell, rent or lease its contact lists to third parties. We may, from time to time, contact you on behalf of external, relevant ministry partners about a particular opportunity that may be of interest to you. In those cases, your unique personally identifiable information (e-mail, name, address, telephone number) is not transferred to the third party. In addition, we may share data with trusted partners to help us perform statistical analysis, send you email or postal mail. All such third parties are prohibited from using your personal information except to provide these services to Crossover Brighton and they are required to maintain the confidentiality of your information.

Explanation of Lawful Basis

Many laws around the world require to show it has properly considered which lawful basis applies to each processing purpose. It also requires controllers to justify the decision. Toward that, and using EU GDPR definitions below, the following lawful basis applies to processing activities noted in the table above.

- Consent means we have received your consent to process your personal data for the purpose specified.
- Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you, unless we have your consent or are otherwise required or permitted to by law. You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us at: crossover@holmsted.org.uk
- Performance of Contract means processing your data where it is necessary for the performance of an agreement to which you are a party or to take steps at your request before entering into such an agreement.

- Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Third-party Links

This website may include links to third-party websites. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice or other relevant information of every website you visit.

Communication & Marketing

We will make every effort to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We provide the opportunity for you to opt-out from receiving our marketing communications every time we contact you, by selecting the unsubscribe button at the bottom of our emails. To stop receiving other forms of communication, please email: crossover@holmsted.org.uk

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing). Where you have provided consent, we may contact you via post, by telephone and email, to let you know about our events and activities that might be of particular interest to you and about the ministry of Crossover Brighton more generally.

You will receive marketing communications from us if you have requested information from us and if you provided us with your details.

Opting Out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time. Where you opt-out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase, service experience or other transaction.

When We Might Change How We Use Your Data

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you would like an explanation about how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process or disclose your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Where we store your Personal Information

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating

outside the EEA. By submitting your personal data, you agree to this transfer, storing or processing. Crossover Brighton will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk.

Transferring Your Data

Many of our external third parties are based outside the European Economic Area (EEA). In those cases, processing of your personal data will involve a transfer of data outside the EEA. A list of the external third parties are shown below.

Name of Subprocessors	Registered Business Address	Location of Processing	Link to Privacy / Security Policy
G-Suite	Googleplex, Mountain View, California	USA	https://policies.google.com/privacy
GoDaddy	Corporate Headquarters 14455 N. Hayden Rd., Ste. 226Scottsdale, AZ 85260 USA	USA	https://uk.godaddy.com/agreements/showdoc?pageid=PRIVACY
Instagram	Menlo Park, California, United States	USA	https://www.facebook.com/privacy/explanation
Youtube	Googleplex, Mountain View, California	USA	https://policies.google.com/privacy
Paypal	S.à.r.l. et Cie, S.C.A., 22-24 Boulevard Royal L-2449, Luxembourg	Luxembourg	https://www.paypal.com/uk/webapps/mpp/ua/privacy-full
Google Analytics	Googleplex, Mountain View, California	USA	https://policies.google.com/privacy
Stewardship	Lamb's, 1 Lamb's Passage, London EC1Y 8AB	England	https://www.stewardship.org.uk/privacy/privacy-notice

Lloyds Bank	25 Gresham Street, London EC2V 7HN	England	https://www.lloydsbank.com/help-guidance/privacy/data-privacy-notice.html
Squarespace	Squarespace UK Limited, Attention: Legal - Privacy, 10 John Street, London, WC1N 2EB United Kingdom	England	https://www.squarespace.com/privacy

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by employing at least one (or more) of the following safeguards:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

Your Security

We have put into place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those staff, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

How Long We Will Use Your Data?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes. With respect to information you provide to us in relation to an application, we may keep this information for up to twelve years to make the processes by which we evaluate and assess candidates more efficient.

In some circumstances you can ask us to delete your data: see below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Your Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us at: crossover@holmsted.org.uk. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What We May Need from You

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Contact Information

Crossover Brighton welcomes your comments regarding this Privacy Notice. If you believe that we have not adhered to this notice, please contact us at; crossover@holmsted.org.uk We will use reasonable efforts to promptly determine and remedy the problem. Our Data Privacy Manager can be contacted on: 01444 440 229.

