

PRIVACY POLICY

Siloam Christian Ministries Ltd

1. Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (the "GDPR").

2. Who are we?

Siloam Christian Ministries Ltd ("the Charity") is the data controller. This means it decides how your personal data is processed and for what purposes. "We", "us" and "our" in this policy refer to Siloam Christian Ministries Ltd. "Our website" in this policy also includes the plural, as some projects/campaigns have their own separate site/pages.

3. How do we process your personal data?

Siloam Christian Ministries Ltd 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; 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.

We use your personal data for the following purposes: -

- To enable us to provide a service and finance for the benefit of the poor/disadvantaged/ sick etc as specified in our constitution;
- To administer supporter and employee records;
- To fundraise and promote the interests of the charity;
- To manage our employees and volunteers;
- To maintain our own accounts and records (including the processing of gift aid applications);
- To inform you of news, events, and activities of Siloam Christian Ministries Ltd and to acknowledge your donations and answer your requests/enquiries.

4. What is the legal basis for processing your personal data?

- Explicit consent from you so that we can keep you informed about news, events, activities and services and process your gift aid donations.
- Processing is necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement;
- Processing is carried out by a not-for-profit body with a political, philosophical, religious or trade union aim provided: -
 - the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes); and
 - there is no disclosure to a third party without consent.

5. Sharing your personal data

Your personal data will be treated as strictly confidential and will only be shared with other members of Siloam Christian Ministries Ltd or their third party processors in connection with the organisation's work and strictly under the conditions of this Privacy Policy. We will only share your data with other third parties with your consent.

Information about our supporters is an important part of our business, and we're not in the business of selling it to others. Siloam Christian Ministries Ltd shares supporter information only as described below, with our affiliates

- **Third-Party Service Providers:** We employ other companies and individuals to perform functions on our behalf. Examples include, sending e-mail, removing repetitive information from customer lists, analyzing data, providing marketing assistance, processing payment card payments, and providing customer service. They have access to personal information needed to perform their functions, but may not use it for other purposes. These service providers are obliged to treat your data according to this Privacy Notice and the relevant data protection legislation.

- Protection of Siloam Christian Ministries Ltd and Others: We release account and other personal information when we believe release is appropriate to comply with law; enforce or apply our Terms and Conditions and other agreements; or protect the rights, property, or safety of Siloam Christian Ministries Ltd, our users, or others. This includes exchanging information with other companies and organizations for fraud protection and credit-risk reduction. Obviously, however, this does not include selling, renting, sharing, or otherwise disclosing personally identifiable information from supporters for commercial purposes in violation of the commitments set forth in this Privacy Policy.
- With Your Consent: Other than as set out above, you'll receive notice when information about you might go to third parties, and you'll have an opportunity to choose not to share the information.

Please note:

- It's important for you to protect against unauthorized access to your password and your computer. Be sure to sign off when you've finished using a shared computer.
- Some of our projects are outside the European Economic Area. These may include child or other forms of personal sponsorship scheme. In the event that the sponsor wishes communication with the child/person, this is conducted through Siloam Christian Ministries Ltd and only the name of the sponsor will be passed to the child and/or local project team and only the name of the child is kept on our UK record. If the sponsor, for reasons of their own (which we do not recommend), decides to pass on any other personal information direct to the child or project team, then this is at their own risk and control of such data passes out of the control of Siloam Christian Ministries Ltd

Whenever we transfer personal information to countries outside of the European Economic Area in the course of sharing information as set out above, we will ensure that the information is transferred in accordance with this Privacy Policy and as permitted by the applicable laws on data protection.

6. Use of Cookies

Siloam Christian Ministries Ltd website uses cookies to better the users experience while visiting the website. Where applicable our website uses a cookie control system allowing the user on their first visit to the website to allow or disallow the use of cookies on their computer / device. This complies with recent legislation requirements for websites to obtain explicit consent from users before leaving behind or reading files such as cookies on a user's computer / device.

Cookies are small files saved to the user's computer's hard drive that track, save and store information about the user's interactions and usage of the website. This allows the website, through its server to provide the users with a tailored experience within the website. Users are advised that if they wish to deny the use and saving of cookies from our website on to their computer's hard drive they should take necessary steps within their web browser's security settings to block all cookies from our website and its external serving vendors.

Our website uses tracking software to monitor its visitors to better understand how they use it. This software is provided by Google Analytics which uses cookies to track visitor usage. The software will save a cookie to your computer's hard drive in order to track and monitor your engagement and usage of the website, but will not store, save or collect personal information. You can read Google's privacy policy here for further information [<http://www.google.com/privacy.html>].

Other cookies may be stored to your computer's hard drive by external vendors when this website uses referral programs, sponsored links or adverts. Such cookies are used for conversion and referral tracking and typically expire after 30 days, though some may take longer. No personal information is stored, saved or collected.

7. How long do we keep your personal data?

We keep data only as long as it's required or remains of use. For instance, specifically, we retain gift aid declarations and associated paperwork for up to 6 years after the calendar year to which they relate..

8. Your rights and your personal data

Users contacting our website and/or the Charity do so at their own discretion and provide any such personal details requested at their own risk. Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data: -

- The right to request a copy of your personal data which Siloam Christian Ministries Ltd holds about you;
- The right to request that Siloam Christian Ministries Ltd corrects any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for Siloam Christian Ministries Ltd to retain such data;

- The right to withdraw your consent to the processing at any time
- The right to request that the data controller 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), (where applicable) [*Only applies where the processing is based on consent or is necessary for the performance of a contract with the data subject and in either case the data controller processes the data by automated means*].
- 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;
- The right to object to the processing of personal data, (where applicable) [*Only applies where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics*]
- The right to lodge a complaint with the Information Commissioners Office.

Please note, however, that we reserve the right to request evidence of identity before responding to a request for information, to avoid disclosing data to a fraudulent enquirer who may be seeking information about you.

9. Email Newsletter

Siloam Christian Ministries operate email newsletter programme, used to inform subscribers about projects, news and events. Users can subscribe through an online automated process should they wish to do so but this is at their own discretion. Some subscriptions may be manually processed through prior agreement with the user.

Subscriptions are taken in compliance with UK Spam Laws detailed in the Privacy and Electronic Communications Regulations 2003. All personal details relating to subscriptions are held securely and in accordance with the Data Protection Act 1998 and the new GDPR regulation 25 May 2018. No personal details are passed on to third parties nor shared with companies / people outside of the company that operates our website and email newsletter programme. Under the General Data Protection Regulations, you may request a copy of personal information held about you by our website's email newsletter programme. If you would like a copy of the information held on you please write to the business address at the bottom of this policy.

Email marketing campaigns published by Siloam Christian Ministries may contain tracking facilities within the actual email. Subscriber activity is tracked and stored in a database for future analysis and evaluation. Such tracked activity may include (but not restricted to): the opening of emails, forwarding of emails, the clicking of links within the email content, times, dates and frequency of activity. This information is used to refine future email campaigns and supply the user with more relevant content based around their activity. In compliance with UK Spam Laws and the Privacy and Electronic Communications Regulations 2003 subscribers are given the opportunity to un-subscribe at any time through an automated system. This process is detailed at the footer of each email campaign. If an automated un-subscription system is unavailable clear instructions on how to un-subscribe will be detailed instead.

10. External Links

Although our website sets out to include only quality, safe and relevant external links, users are advised adopt a policy of caution before clicking any external web links mentioned throughout our website. (External links are clickable text / banner / image links to other websites)

We cannot guarantee or verify the contents of any externally linked website despite our best efforts. Users should therefore note that they click on external links at their own risk and we cannot be held liable for any damages or implications caused by visiting any external links mentioned.

11. Adverts and Sponsored Links

Our website may contain sponsored links and adverts. These will typically be served through our advertising partners, who may have detailed privacy policies relating directly to the adverts they serve.

Clicking on any such adverts will send you to the advertiser's website through a referral program which may use cookies and will track the number of referrals sent from our website. This may include the use of cookies which may in turn be saved on your computer's hard drive. Users should therefore note they click on sponsored external links at their own risk and we cannot be held liable for any damages or implications caused by visiting any external links mentioned.

12. Social Media Platforms

Communication, engagement and actions taken through external social media platforms that our website and the Charity participate on are subject to the terms and conditions as well as the privacy policies held with each social media platform respectively.

Users of our website and associated media are advised to use social media platforms wisely and communicate / engage upon them with due care and caution in regard to their own privacy and personal details. We will never ask for personal or sensitive information through social media platforms and encourage users wishing to discuss sensitive details to contact us through primary communication channels such as by telephone or email.

Our website may use social sharing buttons which help share web content directly from web pages to the social media platform in question. Users are advised before using such social sharing buttons that they do so at their own discretion and note that the social media platform may track and save your request to share a web page respectively through your social media platform account.

13. Shortened Links in Social Media

We, through our social media platform accounts, may share web links to relevant web pages. By default some social media platforms shorten lengthy web addresses (known as URLs) - for example: <http://bit.ly/zyVUBo>. Users are advised to take caution and good judgement before clicking any shortened URLs published on social media platforms by our website and the Charity. Despite the best efforts to ensure only genuine URLs are published many social media platforms are prone to spam and hacking and therefore our website and the Charity cannot be held liable for any damages or implications caused by visiting any shortened links.

14. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Protection 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.

15. Contact Details

To exercise all relevant rights, queries or complaints please in the first instance contact Siloam Christian Ministries Ltd at PO Box 4198, Leamington Spa, Warwickshire, CV31 9BP, or 01926 335037 or info@siloam.org.uk

You can contact the Information Commissioners Office on 0303 123 1113 or 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.

Resources & Further Information

[Data Protection Act 1998](#)

[Privacy and Electronic Communications Regulations 2003](#)

[Privacy and Electronic Communications Regulations 2003 - The Guide](#)

[Twitter Privacy Policy](#)

[Facebook Privacy Policy](#)

[Google Privacy Policy](#)

[LinkedIn Privacy Policy](#)

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