Data Protection & Privacy Policy

Faith & Thought (The Victoria Institute)

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| Last updated | 26th May 2018 |

## Definitions

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| **Charity** | means Faith & Thought (The Victoria Institute) a registered charity - Charity Registration No. 285871 |
| **GDPR** | means the General Data Protection Regulation. |
| **Responsible Person** | means the administrator of Faith & Thought – currently Dr Alan Kerry |
| **Register of Systems** | means a register of all systems or contexts in which personal data is processed by the Charity. |

### 1. Data protection principles

The Charity is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

1. processed lawfully, fairly and in a transparent manner in relation to individuals;
2. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
3. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
4. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
5. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
6. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

### 2. General provisions

1. This policy applies to all personal data processed by the Charity.
2. The Responsible Person shall take responsibility for the Charity’s ongoing compliance with this policy.
3. This policy shall be reviewed at least annually.
4. The Charity is exempt from registering with the Information Commissioner’s Office as an organisation that processes personal data as:
	1. We only process information necessary to establish or maintain membership or support
	2. We only process information necessary to provide or administer activities for people who are members of the organisation or have regular contact with it;
	3. We only hold information about individuals whose data we need to process for this exempt purpose
	4. The personal data we process is restricted to personal information that is necessary for this exempt purpose.

### 3. Lawful, fair and transparent processing

1. To ensure its processing of data is lawful, fair and transparent, the Charity shall maintain a Register of Systems.
2. The Register of Systems shall be reviewed at least annually.
3. Individuals have the right to access their personal data and any such requests made to the charity shall be dealt with in a timely manner.

### 4. Lawful purposes

1. All data processed by the charity is done on the lawful basis of ‘Legitimate Interest’:
	1. We have checked that legitimate interests is the most appropriate basis.
	2. We understand our responsibility to protect the individual’s interests.
	3. We have conducted a legitimate interests assessment (LIA) and kept a record of it, to ensure that we can justify our decision.
	4. We have identified the relevant legitimate interests.
	5. We have checked that the processing is necessary and there is no less intrusive way to achieve the same result.
	6. We have done a balancing test, and are confident that the individual’s interests do not override those legitimate interests.
	7. We only use individuals’ data in ways they would reasonably expect, unless we have a very good reason.
	8. We are not using people’s data in ways they would find intrusive or which could cause them harm, unless we have a very good reason.
	9. If we process children’s data, we take extra care to make sure we protect their interests.
	10. We have considered safeguards to reduce the impact where possible.
	11. We have considered whether we can offer an opt out.
	12. If our LIA identifies a significant privacy impact, we have considered whether we also need to conduct a DPIA.
	13. We keep our LIA under review, and repeat it if circumstances change.
	14. We include information about our legitimate interests in our privacy information.
2. The Charity shall note the appropriate lawful basis in the Register of Systems.
3. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
4. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Charity’s systems.

### 5. Data minimisation

1. The Charity shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

### 6. Accuracy

1. The Charity shall take reasonable steps to ensure personal data is accurate.
2. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

### 7. Archiving / removal

1. To ensure that personal data is kept for no longer than necessary, the Charity shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
2. The archiving policy shall consider what data should/must be retained, for how long, and why.

### 8. Security

1. The Charity shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
2. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
3. When personal data is deleted this should be done safely such that the data is irrecoverable.
4. Appropriate back-up and disaster recovery solutions shall be in place.

### 9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Charity shall promptly assess the risk to people’s rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/personal-data-breaches/)).

### 10. Online Data -The Website

Faith & Thought.org, the Internet site located at https://www.Faith & Thought.org (the "Site"), is operated and maintained by Faith & Thought (The Victoria Institute). This Privacy Policy describes Faith & Thought's policies and procedures for the collection of personal information by this Site, and our use and dissemination of such information. If you do not feel comfortable with Faith & Thought's Privacy Policy, please do not use this Site or allow your children to use it.

Faith & Thought.org's policy is to respect and protect the privacy of our users. This policy's statement tells you how we collect information from you and how we use it. Using the internet should be a fun and positive experience and we want to help you enjoy it.

1. POLICIES THAT APPLY TO INDIVIDUALS AGE 13 AND OVER COLLECTION OF PERSONALLY IDENTIFIABLE INFORMATION BY FAITH & THOUGHT

Personally identifiable information about visitors to this Site (that is, information such as a visitor's name, email address, mailing address, or telephone number) is collected only when knowingly and voluntarily submitted. Such information may be requested in connection with our contests, surveys, forums, subscription registrations, content submissions, chats, bulletin boards, guestbooks, requests for suggestions, visitors' requests for products or services, and visitors' requests for additional information. Faith & Thought does not require a visitor to disclose more information than is reasonably necessary to participate in the online activity he or she is interested in.

1. WHAT FAITH & THOUGHT DOES (AND DOESN'T DO) WITH THE PERSONAL INFORMATION WE COLLECT
	1. Faith & Thought uses personally identifiable information only for the purpose for which it is submitted unless we disclose other uses at the time of collection, in which case you will have the opportunity to instruct us not to use your data in other ways (i.e., "opt-out").
	2. Sharing Personal Information. Faith & Thought does notshare personally identifiable information with third-parties. However:
		* We may share your Personal Information to comply with applicable laws and regulations, to respond to a subpoena, search warrant, or other lawful requests for information we receive, or to otherwise protect our rights.
		* We may share your Personal Information with third parties (including our service providers and government entities) to detect, prevent, or otherwise address fraud, security, or technical issues.

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1. LINKS/CO-BRANDED SITES
	1. Faith & Thought.org does not carry commercial advertising.
2. NON-PERSONALLY IDENTIFIABLE INFORMATION
	1. When visitors come to our Site, the site may collect and aggregate information indicating, among other things, which web pages were visited, the order in which they were visited, and which hyperlinks, if any, were "clicked" by the visitor. Faith & Thought, like most major web sites, collects such information by placing small bits of information, known as "cookies", on the hard drive of your computer to log IP addresses, operating system (e.g., Windows or Macintosh), type of browser software (e.g., Netscape Navigator or Internet Explorer), and Internet service providers (e.g., AOL or NET.org) used by each visitor to the Site.
	2. Cookies enable us to do a number of things to make your visit and future visits to the site more enjoyable. For example, cookies allow a visitor to quickly log on to a site he/she has used before by storing a password. By tracking how many people visit our Site and where they go, we are able to determine which part of the Site users like the best, which part needs some improvement and what changes should be made. By obtaining this information, we are able to continually improve our Site and bring you the best online experience possible.
	3. Although the cookie itself does not collect any personally identifiable information about a visitor, and Faith & Thought does not use cookies in order to obtain such information, the cookie can be used to determine the IP address of the visitor's Internet Service Provider and the geographic location of his or her point of connectivity to the Internet. Faith & Thought may also disclose some of the non-personally identifiable information we obtain to advertisers to inform them how many people have seen or linked to their advertisements on our Site. However, we do not disclose personally identifiable information to these advertisers. Visitors may also receive cookies from third parties, but Faith & Thought cannot control the content of these cookies.
	4. Faith & Thought does not save credit card information in a cookie.
	5. For more information about cookies, and how to disable cookies, visit <http://www.allaboutcookies.org>
	6. Our Site can contain pixel tags, web beacons, and clear gifs embedded in web pages, videos, or emails, allow a web server to read certain types of information from your browser, check whether and when you have viewed a particular web page or email message, and determine, among other things, the IP address of your computer and the URL of the web page from which the pixel tag was viewed.
	7. You should consult your browser owner's manual for instructions on how to refuse cookies.
3. REVIEWING AND MAKING CHANGES TO PERSONALLY IDENTIFIABLE INFORMATION
	1. Visitors may review or delete personal information from our records at any time. If you no longer wish to receive our newsletter and promotional communications, you may opt-out of receiving them by contacting the administrator / responsible person at admin@faithandthought.org . According to the Privacy Shield Principles, the EU GDPR, and other applicable privacy laws, you have the right to:
		* Know what Personal Information Faith & Thought has about you;
		* Ensure your Personal Information is accurate and relevant for the purposes for which Faith & Thought collected it;
		* Make your Personal Information portable to another data controller;
		* Withdraw your consent to Faith & Thought processing your Personal Information; and
		* Have your Personal Information erased.
	2. If you would like to review, correct, receive a copy of, or erase the Personal Information we have about you or withdraw your processing consent, please send us your request to the administrator / responsible person at admin@faithandthought.org . or write to us at Faith & Thought (The Victoria Institute) 3 Dukes Place, 19 Watford Road, Croxley Green, Hertfordshire, WD3 3DP. Unless a legal exemption applies, we will respond to all such requests within thirty (30) days. If you would like to know whether we have collected personal information about you, please provide us with the activities that you participated in on the Site, which requested personal information. After we have reviewed the relevant databases, we will confirm whether we have collected such information about you. Prior to changing or deleting such information, we require that you provide us with proof of your name and address, such as a valid driver's license. Once we have received such proof and determined that it is satisfactory, we will immediately delete or modify your information in our database and refrain from collecting any other personally identifiable information from you, if you so request. However, there may be residual information that will remain within our databases that may or may not contain personally identifiable information. This residual information will not be given to any other third party or used for any commercial purpose.
	3. Additionally, when you make a purchase or attempt to make a purchase through the Site, we collect certain information from you, including your name, billing address, shipping address, email address, and phone number. We refer to this information as “Order Information.” Your payment information is collected by our payment processor (PayPal) and is not stored within our Site.
	4. When we talk about “Personal Information” in this Privacy Policy, we are talking about both Device Information and Order Information.
4. SECURITY AND INTEGRITY OF PERSONAL INFORMATION
	1. Faith & Thought has established and maintains reasonable procedures to protect the confidentiality, security, and integrity of Personal Information collected by this Site.
	2. We hold your Personal Information in a combination of hard copy and electronic files for the period necessary to support the Site, comply with our legal obligations, resolve disputes, or otherwise fulfill the purposes outlined in this Privacy Policy. Even after you cancel your account, copies of some information from your account may remain viewable in some circumstances where, for example, you have shared information with social media or other services. We may also retain backup information related to your account on our servers for some time after cancelation for fraud detection or to comply with applicable law or our internal security policies. We do not always remove or delete all of your non-personally identifiable account information for a number of reasons due to technical and systems constraints, or contractual, financial, or legal requirements.
	3. The security of your Personal Information is important to us. If Faith & Thought learns of a security breach that may affect your data, we will notify you electronically so that you can take appropriate protective steps. We may communicate with you electronically regarding security, privacy, and administrative issues related to your use of the Site.
5. II. ADDITIONAL POLICIES THAT APPLY TO CHILDREN UNDER 13 KIDS AND INTERNET SAFETY
	1. We at Faith & Thought understand that the Internet presents an opportunity for us to reach the public in new and exciting ways. Faith & Thought also recognizes the privacy concerns of parents, and the importance of protecting the privacy of the information this Site collects from children. Parents of children who visit this Site can be confident that any personal information that may be provided to this Site will be collected and maintained in accordance with the Children's Online Privacy Protection Act ("COPPA"). Faith & Thought encourages parents to supervise their children's activities online and to participate with their children's online activities whenever possible. However, we understand that parents may not always be able to supervise their children's activities on the Internet. That's why Faith & Thought has developed a Site that parents can feel is safe for their children.
	2. When a visitor to our Site is under the age of 13, Faith & Thought does not require the disclosure of more personally identifiable information than is reasonably necessary for him or her to participate in an activity as a condition of such participation.
6. YOUR ACCEPTANCE OF THESE TERMS

By using this site, you signify your assent to Faith & Thought (The Victoria Institute). If you do not agree to this policy, please do not use our sites. Your continued use of the Faith & Thought.org and affiliated sites after the posting of changes to these terms will mean you accept those changes.

END OF POLICY