

# Introduction

- 1.1. Time for God appreciate and value all who engage with us, and take your privacy seriously. We are committed to protecting your privacy, and to transparency on any information that we hold about you.
- 1.2. This Policy explains how we handle your Personal Data securely, and in accordance with your rights.
- 1.3. If you use our website, or share Personal Data with us, we will direct your attention to this Policy so that you are fully aware of how your information will be processed and stored.
- 1.4. Please carefully read through this Privacy Policy, so that you understand how we will treat your Personal Data
- 1.5. Details of the Personal Data collected from volunteers is listed in the addendum at the end of this policy

## **Our Privacy Policy in Summary**

- 2.1. Please read Time for God's full Privacy Policy, so that you understand what information we hold, how we process this information, and what rights you have concerning your Personal Data. The following is an overview summary of the detailed Policy:
- Personal Data is defined as any information that can be used to identify you. We only collect the Personal Data necessary for our programme to operate.
- We collect Personal Data from: information given to us directly by you (e.g. when you contact Time for God with a query or application); information provided to us by partner organisations in the UK and overseas (e.g. application forms forwarded to us by overseas Sending Organisation Partners); information from your use of the Time for God website (e.g. details of pages visited); information obtained as a result of your giving information to other organisations (e.g. information from JustGiving donations); and information from public sources (such as information accessed through Google and other search engines.)
- In order for our programme to operate, we do collect Sensitive Personal Data (e.g. medical data, and data on religious beliefs), but there are clear reasons for us to do so.
- Your Personal Data is used for a variety of purposes. These include: recruiting, matching and supporting volunteers in their service at UK placements; keeping you up-to-date with our latest news; asking for financial support; processing donations; dealing with queries; and storing your data to aid you when you come back to our website.

- We may share your Personal Data with other organisations, both those who deliver services to us (e.g. Railcard providers, Just Giving and other charitable donation organisations), and partner organisations that we work with to recruit, place and support volunteers (e.g. our UK Hosting Organisations).
- We also share Personal Data where we are required by law to do so, but we will never sell your Personal Data to other organisations or allow them to use your Personal Data for their own purposes.
- We have varied legal bases of processing your Personal Data, including consent for email correspondence, and the extensive use of legitimate interests for our volunteer matching, placing and support processes, and direct marketing.
- We do our best to keep your Personal Data safe, secure, and accessible to you on request.
- We store your Personal Data for as long as is necessary for our programme to operate, and no longer.
- Your individual rights over your Personal Data are always respected.

#### Who are Time for God?

- 3.1. Time for God are a charity registered in England and Wales (number 1101997). Our company number is 3971726 and our registered office is at Community House, 46-50 East Parade, Harrogate, HG1 5RR
- 3.2. Time for God have operated for over 50 years to meet our vision of providing quality volunteer service opportunities through which God changes lives. We do this by working in partnership with UK and overseas projects, bringing volunteers from all over the world to serve in UK communities for 10-12 month periods, while also undertaking a structured programme of support and training.
- 3.3. For further information about our Privacy Policy and data protection, please contact us by: e-mailing us at <a href="mailto:office@timeforgod.org.uk">office@timeforgod.org.uk</a> writing to our registered address; or calling us on 01423 536 248

#### What Personal Data do we collect from you and where do we collect it from?

- 4.1. Any information that can be used to directly identify you is Personal Data. We only collect the Personal Data that we need for our programme to operate and improve, and/or you consent to our collecting. For example, Personal Data we collect could include information such as your name, postal address, email address, telephone number, or bank account details. We also collect Sensitive Personal Data, including medical details and information on religious affiliation.
- 4.2. Personal Data also includes the location of your computer on the internet (Internet Protocol (IP) addresses), records of web pages visited, and files downloaded.
- 4.3. We collect information from the following sources (see below for more detailed explanations):
- Information you give to us directly;
- Information gleaned from your use of our website;



- Information that we from you giving permission to other organisations;
- Information gleaned from public sources.
- 4.4. Information that you give us directly: we collect Personal Data each time you contact us, for example if you apply to participate as a volunteer or placement in our programme, make a charitable donation as an alumnus, request materials or information about the Time for God programme, engage with our social media, complete a survey, questionnaire or feedback form, or otherwise provide us with personal information. Please note that you do not have to disclose any of this information to browse our website.
- 4.5. Information from your use of our website: website usage information is collected using cookies. For information, please see our Cookies Policy.
- 4.6. Information that we get as a result of your giving permission to other organisations: we partner with various international and UK organisations to bring volunteers to the UK and support them in their service. These organisations pass on Personal Data to us so we can process volunteer applications. If you give your Personal Data to one of these organisations, it may be passed to us for our processes. We may also collect information that you make available on social media channels such as Facebook, Instagram and Twitter. You can check their privacy policies to find out how they will process your data.
- 4.7. Information from public sources: We may collect information available from public sources to gain a better understanding of our supporters so that Time for God can be as relevant to you as possible, and we can tailor any requests for support that we might make. Such information may be found at places such as Companies House, or published online and accessed through search engines such as Google.
- 4.8. Sensitive/special categories of data: Data Protection regulations recognise that certain categories of data are sensitive. They include: racial or ethnic origin, political opinion, religious or philosophical beliefs, health or sexual orientation. We do not collect sensitive data unless there is a clear reason for doing so. For example, we do collect medical and dietary information, and information about religious beliefs and sexual orientation, when individuals apply to participate in our programmes as a volunteer, to help us appropriately place and support volunteers during their voluntary service.
- 4.9. Under 18's: Our programme is open only to volunteer candidates who are aged 18 or older. Time for God will, though, process applications from candidates who will turn 18 before their service period begins.

# How we use your Personal Data?

- 5.1. Time for God will use your Personal Data for the following purposes:
- to communicate with you directly, including sending you information about our programme which we think may be of interest to you. This will include:

- keeping you up to date on news and stories about Time for God's work through publications such as the Time for God e-newsletter.
- asking for financial support (for example from our alumni, or participating placements and other supporters) or non-financial support such as prayer.
- to process donations you give us, including administering Gift Aid. This includes donations online (through JustGiving) or offline (such as letters enclosing a cheque)
- to process applications to participate in our programme (as a volunteer, Sending Organisation or Hosting Organisation)
- to match volunteer candidates to suitable UK Hosting Organisations
- to support volunteers during their service at UK Hosting Organisations
- to contact you via e-mail, phone or mail to thank you, answer queries or deal with complaints
- to complete surveys that we use for research purposes and programme improvement
- to store your data to pre-populate fields to make it easier for you to provide information when you return to our website
- to validate your Personal Data (and, in some cases, match it against information that has been collected by a third party) so that the information we hold about our participants/users is accurate, consistent and up to date
- to comply with any legal obligations
- in pursuit of our legitimate interests, such as defending our legal rights
- 5.2. Direct marketing: The provision of Personal Data for the purposes of direct marketing is voluntary. You can choose at any time which marketing materials you want to receive from Time for God. If there is something you would prefer not to receive, please e-mail us at <a href="mailto:office@timeforgod.org.uk">office@timeforgod.org.uk</a> or select "unsubscribe" on the relevant marketing communication. Alternatively, write to us at Data Protection, Time for God, Community House, 46-50 East Parade, Harrogate, North Yorkshire, HG1 5RR, or call us on 01423 536248.
- 5.3. If you would like to update or review the Personal Data we hold about you, please contact us with your request by e-mailing <a href="mailto:office@timeforgod.org.uk">office@timeforgod.org.uk</a>. Alternatively, write to us at Data Protection, Time for God, Community House, 46-50 East Parade, Harrogate, North Yorkshire, HG1 5RR, or call us on 01423 536248.
- 5.4. Using website data:
- Cookies: A cookie is a text file that is sent from our website as soon as you visit the site. It is stored on your computer and helps us identify your computer (not you) and collects information anonymously. Cookies cannot be used by themselves to identify you. You can find out more information in our Cookies Policy.
- 5.5. We never sell your data to other organisations or allow them to use your data for their own purposes.



- 5.6. We do share Personal Data with other organisations which provide a service to us. These include: Sending Organisations who provide us with and support volunteer candidates, Hosting Organisations where volunteers are placed for their service, and third-party organisations, such as the Railcard service, the visa SMS system, Just Giving, and Mailchimp (who send out e-mails on our behalf). These service providers also have compliant processing agreements, so that your Personal Data is processed in accordance with applicable data protection legislation.
- 5.7. We do share Personal Data where we are under a legal obligation to do so (for example, Gift Aid audits by HMRC, audits by the UK National Agency and visa authorities) or to protect Time for God (for example in cases of suspected fraud).

### What is our legal basis of processing?

- 6.1. We rely on a variety of legal bases for processing Personal Data depending on the purpose of the activity being undertaken.
- 6.2. We rely on legitimate interests for a variety of purposes, including:
- Disseminating the latest news about Time for God to participating volunteers, Hosting Organisations, and alumni
- Appeals for financial support (to our alumni network)
- News about upcoming conferences and events for alumni and currently participating volunteers and Hosting Organisations
- Re-contacting those volunteers and Hosting Organisations who have previously participated in the Time for God programme,
- Using Personal Data during the recruiting and placement matching processes, and subsequently supporting the voluntary services of participants on the Time for God programme, and for keeping records of these processes (see addendum at the end of this document).

Processing data from applicants allows us to manage the selection process, assess and confirm a candidate's suitability for placement and decide to whom to offer a placement. It also enables us to deliver administrative services e.g. organising conference travel and Railcards for participating volunteers.

6.3. In relying on legitimate interests, we balance the interests of Time for God alongside individual rights and freedoms, having due regard for your reasonable expectations about the use of your Personal Data. We have written a Legitimate Interest Assessment to show how we have come to these decisions. This Assessment is available on request. Please contact us by e-mailing <a href="mailto:office@timeforgod.org.uk">office@timeforgod.org.uk</a>. Alternatively, write to us at Data Protection, Time for God, Community House, 46-50 East Parade, Harrogate, North Yorkshire, HG1 5RR, or call us on 01423 536248.

- 6.4. We use consent for all e-mail activity relating to the dissemination of the Time for God newsletter, and for fundraising appeals. Every such e-mail you receive provides a clear opportunity for you to unsubscribe from future e-mails. Alternatively, you can unsubscribe by contacting us by emailing <a href="mailto:office@timeforgod.org.uk">office@timeforgod.org.uk</a>. Alternatively, write to us at Data Protection, Time for God, Community House, 46-50 East Parade, Harrogate, North Yorkshire, HG1 5RR, or call us on 01423 536248.
- 6.5. We use compliance with a legal obligation as the basis of processing for any legally required activities such as HMRC's requests for information in response to Gift Aid audits.

#### How do we store your Personal Data and keep it safe?

- 7.1. Security: We place great importance on the security of all Personal Data held by Time for God and have appropriate processes and controls to protect your privacy:
- The information you provide to us is stored securely on the cloud, and is therefore encrypted, with secure access to Time for God staff via password protected accounts and business-level antivirus/security products.
- All staff computers and laptops are password protected, so your Personal Data is only accessible by Time for God staff.
- Unfortunately, the transmission of information via the Internet cannot be guaranteed to be 100% secure. We will do our best to protect your Personal Data, but we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk.
- Hard-copy Personal Data is stored securely in the Time for God office, in lockable filing cabinets.
- 7.2. Donations: If you give online to Time for God through Just Giving using a credit or debit card, then Time for God does not store your bank or card details. These transactions are undertaken securely by Just Giving. More information can be found on their website: <u>JustGiving.com</u>.
- 7.3. Transferring your information outside Europe: Although most of the information we store and process stays within the UK, some information may be transferred to countries outside the European Economic Area (EEA). We will, however, always use every reasonable effort to ensure sufficient protections are in place to safeguard your Personal Data. We use cloud based systems to process data and therefore data may be processed outside of the European Economic Area (EEA). We take all reasonable steps to ensure that your data is stored and processed securely in accordance with this policy. By submitting your Personal Data you agree to this transfer, storing and processing of your information.

### **How long do we store your Personal Data for?**

- 8.1. We only store your Personal Data for the duration of the purposes described in this Privacy Policy.
- 8.2. We have a data retention policy to implement this, and will hold your Personal Data on our systems for as long as is necessary for the relevant activity. Your Personal Data will then be archived, deleted, or destroyed, as appropriate.



- 8.3. For example, there are legal requirements around the retention of data relating to donations. We will retain details of donations for seven years to meet the requirements that HMRC sets for Gift Aid audits.
- 8.4. Personal data for applicants and participants in our programmes has specific requirements and systems, as it can include sensitive data, for example relating to medical or pastoral issues. After your placement has finished with Time for God, selected data will be stored in our archive records indefinitely for our alumnus programme. Any remaining data will be deleted after 3 years.
- 8.5. If you request that we stop sending you marketing materials (newsletters, volunteer recruitment notices or funding appeals) we will remove you from the appropriate lists.
- 8.7. Where your information is no longer required we will ensure that it is disposed of in a secure manner.

### What are your rights?

### 9.1. You have the following rights:

- To be informed: which is achieved through this Privacy Policy
- Access to your Personal Data: You may request access to a copy of your Personal Data (known as a subject access request) which we will meet without undue delay and at the latest within one month.
- Rectification: You may ask us to rectify inaccurate Personal Data held about you. If you would like
  to update the Personal Data we hold about you, please contact us using the details below and
  provide the updated information. We will meet requests without undue delay and at the latest
  within one month.
- Erasure: You may ask us to delete your Personal Data. If you would like us to delete the Personal Data we hold about you, please contact us using the details below, specifying why you would like us to delete your Personal Data.
- Right to restrict processing: You may ask us to restrict the processing of your Personal Data in certain circumstances. This means that you can limit the way that Time for God uses your data.
- Portability: You may ask us to provide you with the Personal Data that we hold about you in a structured, commonly used, machine readable form, or ask for us to send such Personal Data to another data controller. We will meet requests without undue delay and at the latest within one month.
- Right to object: You may object to our processing of your Personal Data for example for direct marketing purposes. To object, please contact us by e-mailing office@timeforgod.org.uk.
   Alternatively, write to us at Data Protection, Time for God, Community House, 46-50 East Parade, Harrogate, North Yorkshire, HG1 5RR, or call us on 01423 536248.
- Make a complaint: You may make a complaint about our data processing activities to a supervisory authority. For the UK, this is the Information Commissioner's Office, at <a href="ico.org.uk">ico.org.uk</a>.

- 9.2. To make enquires and/or to exercise any of your rights in this Privacy Policy please contact us by e-mailing <a href="mailing-effice@timeforgod.org.uk">office@timeforgod.org.uk</a>. Alternatively, write to us at Data Protection, Time for God, Community House, 46-50 East Parade, Harrogate, North Yorkshire, HG1 5RR, or call us on 01423 536248.
- 9.3. Please note that if we are not sure who you are, we may ask you to provide a form of identification verification before providing you with information or carrying out any of the above actions.

#### **Changes to our Privacy Policy**

- 10.1. As our processes evolve, we will modify this Privacy Policy, so please review it regularly.
- 10.2. If we change this Privacy Policy in a way that may substantially alter the purposes for which we process your Personal Data we shall notify by means of notice on our website at <a href="www.timeforgod.org">www.timeforgod.org</a>
- 10.3. This Privacy Policy was last amended on 22 June 2018.

# **Volunteer Addendum – What Personal Data is collected? When? How is it used?**

- 11.1. Personal Data collected through the recruitment process (application form and interview with a Time for God staff member):
  - Contact information (name, home address, mobile telephone, email, Skype address)
  - Personal information (marital status, gender, date of birth, nationality, a recent photograph)
  - Sensitive Personal Data (religious affiliation, sexuality, medical and dietary requirements including mental health provision)
  - Historical information (educational experience, professional experience, voluntary experience, religious experience, qualifications)
  - Personal information (hobbies and interests, personality, motivation, Time for God placement context preferences, family background, aptitudes and abilities)
  - Financial information (ability to pay volunteer fees and flight/visa costs as appropriate)
  - Supporting documents (3 references, letters of motivation)

This Personal Data will be used by Time for God to:

- Gauge applicants' suitability for the Time for God Programme (a discernment process undertaken by the Time for God staff team)
- Match successful candidates to a suitable UK Hosting Organisation
- 11.2. Personal Data collected once a volunteer is accepted onto the Time for God programme, and matched with a UK Hosting Organisation:
  - Supporting documents (passport scans, visa-application supporting documents including visa and BRP scans)
  - Sensitive Personal Data (police check from home country and further information on medical and dietary requirements)
  - Volunteer Declaration responses (concerning safeguarding questions)
  - Next of kin information and contact details



- [Where applicable] JustGiving fundraising webpage details

#### This Personal Data will be used by Time for God to:

- Generate visa Certificates of Sponsorship (where applicable)
- Generate Railcards (where applicable)
- Satisfy safeguarding protocols at Hosting Organisations
- Satisfy the demands on Time for God as a visa sponsor (where applicable)
- Provide suitable medical and dietary provision at Time for God conferences
- Contact next of kin in case of emergency
- Monitor volunteer fundraising (where applicable)

# 11.3. Personal Data collected once a volunteer has begun their voluntary service:

- On Arrival information (focusing on induction and settling in checks, and UK bank account details)
- Mid-Term information (focusing on target setting and review)
- Conference evaluation information (following Time for God events your feedback and comments)
- RAG report information (Personal Data supplied to your Time for God Field Officer concerning how your service is progressing)
- End of service evaluation (focusing on reviewing your year and looking to next steps)
- Information posted by you on our closed volunteer Facebook, Twitter and Instagram groups/feeds

#### This Personal Data will be used by Time for God to:

- Support your settling in at your Hosting Organisation
- Monitor your growth and wellbeing at your Hosting Organisation
- Gauge the efficacy of Time for God's conference training and associated processes
- Support your target setting at your Hosting Organisation
- Support your readying yourself for returning to your home country
- Promote Time for God, and the TfG programme

#### 11.4. Personal Data collected once a volunteer has completed their service as a Time for God volunteer:

- A contact email to be enrolled on our alumnus mailing list
- Your name, placement and volunteer cohort for our records

#### This Personal Data will be used by Time for God to:

- Contact you with news about the Time for God programme, including funding requests