

# **Privacy Notice**

### 1. INTRODUCTION

Your privacy is important to us. Navigators UK values everyone who engages with us by whatever means, and we do all we can to protect your privacy and to make sure the personal data you give us is kept safe. This policy explains how we collect data, how we use and store that data and what it means for you.

For the purposes of this policy first person pronouns (we, us) refer to the Navigators the organisation, second person pronouns (you, yours) refer to the General Public and the third person pronoun (they, their) refer to our Navigator personnel (individual Navigator Representatives, Connect Workers, Trustees and paid employees).

## 2. WHO WE ARE

Navigators UK is part of the Navigators, a worldwide mission organisation. Our purpose is to advance the Christian religion in the UK and overseas through evangelism, teaching, mentoring, training and the production and distribution of materials. For more details on our values and history see About Us.

Navigators UK is a charity registered in England and Wales (number 01099148) and Scotland (SC038484). Our company number is 04429021 and our registered office is 54 The Avenue, Southampton, SO17 1XQ.

# 3. WHAT INFORMATION DO WE COLLECT?

# Information collected by Navigators UK

We collect personal information when it is needed to fulfil a service for you, for example when you make a donation, order materials, request information, sign up for an event or otherwise provide your personal details. We collect the information you provide, which may include your e-mail address, name, home address or telephone number.

## Information collected by visiting our website

When visiting the Navigators website, we follow standard practices and may use features which collect your IP address and data on which pages you are visiting on our site. Similarly, as for many websites, we may also issue cookies to enable certain features to function properly, track traffic on our website or improve user experience in other ways. Cookies place certain information on your device to allow this to happen. This allows us to tailor your experience to what we think you want to see.

### Information collected via social media

Social media features and widgets are either hosted by a third party or hosted directly on our site. Your interactions with these features are governed by the privacy policy of the company providing that service.

Depending on your own settings or the policies of social media and messaging services such as Facebook, WhatsApp or Twitter, you may be providing the Navigators and other organisations access to certain information. If you have concerns, you should check with those services to ensure you're happy with that information being shared.

# Information collected from third parties

We use third parties (e.g. GoCardless, Stripe, PayPal, Eventbrite) to enable you to sign up for events or donate to our ministries. We will store any information that they collect from you and pass onto us in order to provide the service you are signing up to. If you have concerns, you may wish to check their privacy policies to find out more information on how they will process your data.

# Information collected by Navigator personnel (the term 'personnel' includes Representatives, Connect Workers, paid staff and Trustees)

As you interact with Navigator personnel, there will be occasions where they will collect and store basic personal information you have given to them. This data will be processed for the purposes you gave the information in the first place.

Navigator personnel will collect and process data for ministry contacts. Ministry contacts are individuals Navigator personnel meet who have expressed an interest in the Navigator ministry. Basic personal information is collected to enable our Navigator personnel to keep the ministry contact informed of opportunities to get involved with the

Navigators. An example would be a first-year student meeting the Navigators at their university's Freshers Fair. If the student chooses to give their name and contact details to the Navigator Representative then they are expressing an interest in what the Navigators are doing and the Representative will use these details to contact them and let them know of future Navigator events taking place.

When you partner with Navigator personnel, in ministry, prayer or financially, that person may keep a copy of your name, address, and donation information on their own electronic device. Some may also choose to store other personal information as a reminder of their ongoing relationship with you. They may also have your information with them when they travel outside of the European Economic Region. If you wish to be added or removed from a Navigator personnel's database you should contact them directly.

As you interact with Navigator personnel, there will be occasions where they will collect and pass basic personal information you have given to them onto the Navigator central office. These details will be shared within the Navigators only for the purposes you gave the information in the first place. For example, in some cases we assist Representatives with sending out their newsletters and keeping you updated with what's happening in their lives. In these cases the contact data the Representative passes on to us to do this will be stored securely on the Navigator central database.

If you are supporting a Navigator Representative who lives outside of the European Economic Region you need to be aware that a copy of your personal details will be held with them for the purpose of keeping you updated.

Navigators UK has a Data Protection Policy in place which helps the Representative be aware of protecting your information. You are welcome to ask that Representative how exactly they are storing your information.

## 4. LEGAL BASIS

We store and process data for the primary purpose of achieving our charitable purposes as set out in the Introduction of this Privacy Policy.

The lawful bases for processing data are defined as:

- (a) Consent: you have given clear consent for us to process your personal data for a specific purpose.
- **(b) Contract**: the processing is necessary for a contract we have with you.
- (c) Legal obligation: the processing is necessary for us to comply with the law.
- (d) Vital interests: the processing is necessary to protect someone's life.
- (e) Public task: the processing is necessary for us to perform a task in the public interest.
- **(f) Legitimate interests**: the processing is necessary for our legitimate interests or the legitimate interests of a third party.

We store the data you provide in our Navigator central database (which includes our website). Where the data is provided for financial support, we store and process your data in order to comply with current charitable and financial legislations, such as processing donations and claiming the related Gift Aid. This is a **legal obligation**.

Where the data is provided in exchange for a service, for example ordering materials or attending an event, we store and process your data to fulfil the **contract** you have made with us.

We collect and process personal data for the purpose of entering into **contract**ual relationships or for precontractual steps at the request of the individual, such as data processed on behalf of Navigator employees, Navigator-appointed Representatives and Connect Workers who are providing services for the charity and applicants to our summer mission trips.

To comply with PECR (Privacy and Electronic Communications Regulations) we require **consent** from you as to whether we may contact you to promote the Navigators' activities, events and fundraising, including the method of contact you prefer. We also require **consent** from you to send you our regular prayer guide. You can unsubscribe from our mailings at any time.

Navigator personnel hold and process data for both their supporters and ministry contacts. Ministry contacts are individuals who have expressed an interest in the Navigators and so have shared their details to be kept informed of

Navigator events and news. Supporters are friends and family of Navigator personnel who are actively supporting that person through prayer and/or financially. In both these cases the data provided is covered by the Navigators' **legitimate interest** in achieving our core ministry objectives.

### 5. WHAT DO WE DO WITH YOUR INFORMATION?

# Processing of requests / donations

We may use the personal data we collect to do one or more of the following:

- Process donations you give us, including claiming gift aid;
- Provide materials you have requested;
- Provide details regarding events you have signed up for;
- Keep records of your relationship with us, e.g. questions you have asked or complaints you have made.

If you have given us consent we will keep you up to date on news and stories about our mission and work. We may ask for financial and non-financial support, such as volunteering or prayer.

# **Processing of data by Navigator personnel**

Our Navigator personnel may use the personal data they have collected to do one of more of the following:

- Use the contact data they have to build and develop relationships with both supporters and those whom they minister to;
- Provide information on events and services provided by the Navigators;
- Ask for financial support;
- Ask for prayer.

## Applying for a job or volunteering with us

Where you provide personal data and sensitive personal data when applying for a job with us, we will process, store and disclose the personal data we collect to:

- Support the recruitment process;
- Answer any questions you may have;
- Use third parties to provide services such as references.

Where you provide personal or sensitive personal data, such as dietary requirements, mobility requirements or health information, to volunteer or travel on a trip with us, we will store, process and disclose the personal information we collect to:

- Deliver the volunteering opportunity, including the disclosure of sensitive data, such as medical information, to our partner(s) where necessary to deliver a safe trip or event for all involved;
- Provide the administration of these events or opportunities to serve;
- Use third parties to provide services such as references and criminal referencing, such as DBS checks;
- Provide appropriate support;
- Answer any questions or feedback you may have.

# 6. HOW AND WHERE DO WE STORE YOUR INFORMATION?

# How long we store your information

We will keep your personal information only for as long as we consider it necessary to carry out each activity. We take account of legal obligations and accounting and tax considerations as well as considering what would be reasonable for the activity concerned. For example, we will retain details of donations for up to 10 years to meet tax and accounting requirements.

Representatives will only continue to store personal data for those supporters and ministry contacts where there is a reasonable chance of an ongoing relationship in relation to their personal ministry.

# Security

We ensure that we have in place appropriate controls to protect any personal data you provide. We ensure that access to personal data is restricted only to those personnel whose roles require such access and that suitable training is provided for these individuals.

We may make use from time to time of external companies to process personal data on our behalf. For example, we may use a mailing house to dispatch our prayer guide or PayPal to receive payments for materials. When we do use

external companies, we remain responsible for the storing and processing of your personal data. We do not store credit card details or bank details.

## Where we store your personal information

We take all reasonable steps to ensure that your data is stored and processed securely, whether in electronic or hard copy formats, and is protected from unauthorised access, use or disclosure. Our website is hosted with WordPress and the servers storing the data are located in the UK.

# 7. WHO DO WE SHARE YOUR INFORMATION WITH?

# **Regulatory bodies**

We may need to pass on information if required by law or by a regulatory body, for example, as part of a gift aid audit by HMRC or if asked for details by a law enforcement agency.

## Third parties

Occasionally we may use third parties to carry out tasks on our behalf, such as setting up direct debits or posting out a mailing. These agents are bound by contract to protect your data and we remain responsible for their actions.

## **Navigator Representatives and Connect Workers**

If you are supporting a Navigator Representative or Connect Worker financially we would normally pass your name, address and the amount donated onto the Representative/Connect Worker so that they know you are supporting them. This is so they can thank you and be aware of how their fundraising is going.

If the individual you are supporting lives outside of the UK then your data may be held by this individual in the country they are residing in. E.g. if you are supporting a worker in Kenya then your details may be stored on this worker's electronic device in Kenya.

If you don't want the person you are supporting to know your identity you can ask to be anonymous. In this case the Navigator office will retain your data, but it will not be passed on to the Representative.

## 8. CHILDREN

We may ask for details concerning children to provide appropriate services, such as childcare at a conference. If a child is over 16 we may collect information directly from the child, which will be processed in an age-appropriate manner.

# 9. PHOTOGRAPHY AND FILMING

We reserve the right to photograph or film volunteers or delegates within public areas at Navigator conferences and events. Only official Navigator photographers will be authorised. Only distance photography will normally be taken during ministry times, and we will not photograph faces without consent.

All photographs taken for Navigators UK are the property of Navigators UK and may be used for illustrative purposes, such as for the website, social media or brochures, for educational purposes, such as providing a visual explanation of the different activities that run during the conferences, or as a resource for future marketing and promotion of Navigator events. It is the responsibility of Navigators UK to make sure that all staff, delegates and volunteers are aware that there may be photography and filming in the public spaces provided. This should be made clear through public notices, signs and/or visual projection.

# **10. YOUR RIGHTS**

Current legislation provides the following rights for individuals in relation to their personal data:

- 1. The right to be informed
- 2. The right of access
- 3. The right to rectification
- 4. The right to erasure
- 5. The right to restrict processing
- 6. The right to data portability
- 7. The right to object
- 8. Rights in relation to automated decision making and profiling

To find out more about what these rights mean for you, please refer to the Information Commissioner's website: https://ico.org.uk/

# Seeing your personal information

Please get in touch to ask for a copy of your information and have any mistakes corrected. We do not charge for these requests.

Please address requests to: Navigators UK, 54 The Avenue, Southampton, SO17 1XQ or email info@navigators.co.uk

# Changing your personal information and consent preferences

You can update your personal information and/or change your preferences on what you receive from us, including marketing and fundraising materials, or how we contact you, by mail or email, at any time. You can do so by:

- Emailing us on info@navigators.co.uk
- Writing to us at Navigators UK, 54 The Avenue, Southampton, SO17 1XQ

# **Deleting your personal information**

You have the right to ask us to delete your personal data, to ask us to restrict our processing or to object to our processing of your personal data. You can do so at any time by writing to us at Navigators UK, 54 The Avenue, Southampton, SO17 1XQ. This right covers all data held by us whether centrally or by our Representatives for their personal ministry.

Please note that we may need to hold onto data for legal reasons, e.g. financial information for auditing purposes. In these cases we will store the minimum data required and will delete it as soon as we are able.

## 11. CHANGES TO THIS STATEMENT

Navigators UK will occasionally update this Privacy Policy to reflect company and customer feedback. We encourage you to periodically review this Policy to be informed of how Navigators is protecting your information.

This statement was last updated in August 2022.