



ST. CHAD'S SANCTUARY

A place of welcome for Asylum Seekers and Refugees.

ST CHAD'S SANCTUARY'S ONLINE PRIVACY POLICY.

1.0 OUR CORE BELIEFS REGARDING USER PRIVACY AND DATA PROTECTION

- User privacy and data protection are human rights
- We have a duty of care to the people within our data
- Data is a liability, it should only be collected and processed when absolutely necessary
- We will never sell, rent or otherwise distribute or make public your personal information

2.0 RELEVANT LEGISLATION

Along with our business and internal computer systems, this website is designed to comply with the following national and international legislation with regards to data protection and user privacy:

- [UK Data Protection Act 1988 \(DPA\)](#)
- [EU Data Protection Directive 1995 \(DPD\)](#)
- [EU General Data Protection Regulation 2018 \(GDPR\)](#)

This site's compliance with the above legislation, all of which are stringent in nature, means that this site is likely compliant with the data protection and user privacy legislation set out by many other countries and territories as well. If you are unsure about whether this site is compliant with your own country of residences' specific data protection and user privacy legislation you should contact our data protection officer (details of whom can be found in section 9.0) for clarification.

3.0 PERSONAL INFORMATION THAT THIS WEBSITE COLLECTS AND WHY WE COLLECT IT

This website collects and uses personal information for the following reasons:

3.1 Site visitation tracking

Like most websites, this site uses Google Analytics (GA) to track user interaction. We use this data to determine the number of people using our site, to better understand how they find and use our web pages and to see their journey through the website.

Although GA records data such as your geographical location, device, internet browser and operating system, none of this information personally identifies you to us. GA also records your computer's IP address which could be used to personally identify you but Google do not grant us access to this. We consider Google to be a third party data processor (see section 6.0 below).

GA makes use of cookies, details of which can be found on [Google's developer guides](#). FYI our website uses the analytics.js implementation of GA.

Disabling cookies on your internet browser will stop GA from tracking any part of your visit to pages within this website.

3.2 Our blog

We currently do not allow comments onto our published pictures and blogs. Back door security means that often they can be used to force access into our website administration. For this reason we do not host a blog on the website, but draw in a secure wordpress blog, to our website. Should this policy change, and you choose to add a comment to any posts that we have published on [our blog](#), the name and email address you enter with your comment will be saved onto the wordpress blog database, along with your computer's IP address and the time and date that you submitted the comment. This information is only used to identify you as a contributor to the comment section of the respective blog post and is not passed on to any of the third party data processors detailed below. Only your name will be shown on the public-facing website although if the supplied email address is linked to a [Gravatar](#) account, your Gravatar photo will also be displayed.

Your comment and its associated personal data will remain on this site until we see fit to either **1.)** Remove the comment or **2.)** Remove the blog post. Should you wish to have the comment and its associated personal data deleted, please email (manager@stchadssanctuary.com) using the email address that you commented with quoting the blog item and the comment you made so that we may identify the correct comment item.

If you are under 16 years of age you **MUST** obtain parental consent before posting a comment on our blog.

NOTE: You should avoid entering personally identifiable information to the actual comment field of any blog post comments that you submit on this website.

3.3 Contact forms and email links

Should you choose to contact us using the email link, none of the data that you supply will be stored by this website or passed to / be processed by any of the third party data processors defined in section 6.0. Instead the data will be collated into an email and sent to us over the [Simple Mail Transfer Protocol \(SMTP\)](#). Our SMTP servers are protected by [TLS](#) (sometimes known as SSL) meaning that the email content is encrypted using [SHA-2](#), 256-bit cryptography before being sent across the internet. The email content is then decrypted by our local computers and devices.

3.4 Email newsletter

If you choose to join our email Bulletin or weekly team meeting minutes, the email address that you submit to us will be added to our [MailChimp](#) account, who provide us with email marketing services. We consider MailChimp to be a third party data processor (see section 6.0 below). The email address that you submit will not be stored within [St. Chad's Sanctuary's website](#) database or in any of our internal computer systems. The charity does utilise Google G-Console to facilitate email functions and non-subscription email addresses are stored securely on Google servers. We consider Google G-Console to be a third party data processor (see section 6.0 below). If your email address is not within the public domain, and you receive a non-subscription email from us and subsequently wish to be removed from our G Console email address book, email info@stchadssanctuary.com and request to have it deleted. This deletion should happen within 30 working days.

For subscription emails, your email address will remain within MailChimp's database for as long as we continue to use MailChimp's services for email marketing or until you specifically request removal from the list. You can do this by unsubscribing using the unsubscribe links contained in any email newsletters that we send you or by requesting removal via email. When requesting removal via email, please send your email to us using the email account that is subscribed to the mailing list.

If you are under 16 years of age you **MUST** obtain parental consent before joining our email newsletter.

While your email address remains within the MailChimp database, you will receive (depending on which list you have subscribed to) Bulletin and/or Team Meeting minute emails from us.

3.5 Social Media

Due to existing legislation known as EU-US Privacy Shield, US organisations (including social media application providers) can self-certify and commit to this framework agreement which underpins their protection of EU citizen data entrusted to them.

In short, this means that both St Chad's Sanctuary and the users of the social media and their audience agree to the terms of the tools used. GDPR will also require them to have an accountable EU representative that can be held to account for the GDPR compliance of the organisation within Europe. Please follow the links below to find the data protection policy of the Social media utilised by St. Chad's Sanctuary.

- Facebook (<https://www.facebook.com/about/privacy>)
- Twitter (<https://twitter.com/en/privacy>)

3.6 Green Text

It is often necessary to contact volunteers and students, en mass, in order to relay important information to them. Green Text is a service that St. Chad's Sanctuary use to facilitate this process. We enter contact details onto their website and this allows the system to function. Communicating important information to relevant parties in this services only use and is not used for any other purpose.

Green Text take care of the information that they hold to allow them to provide the service. Their Privacy policy is linked below.

- Green Text ([Privacy Policy](#))

4.0 HOW WE STORE YOUR PERSONAL INFORMATION

As detailed in section 3.2 above, if you submit a comment to a blog post published on this website some personal information will be stored within this website's database. This is currently the only occasion where personal data will be stored on this website. This data is currently stored in an identifiable fashion; a limitation of the content management system that this website uses to provide a blog service (WordPress).

Pseudonymisation is a recent requirement of the GDPR which many web application developers are currently working to fully implement. We are committed to keeping it as a high priority and will implement it on this website as soon as third party services such as Wordpress make this service available.

5.0 ABOUT THIS WEBSITE'S SERVER

This website is hosted by [LCN](https://www.lcn.com/) (https://www.lcn.com/) within a UK data centre.

Information about the security features offered by [LCN](#) can be found [here](#)

Some of the data centres more notable security features are as follows:

- Blast proof anti-intruder shielded external windows and doors
- Server cabinets have locked doors (no open racks)
- 24x7 on-site security guards with static and mobile patrols
- All on-site personnel are security vetted to BS7858 standard
- Only authorised security cleared staff are allowed into the facility

6.0 OUR THIRD PARTY DATA PROCESSORS

We use a number of third parties to process personal data on our behalf. These third parties have been carefully chosen and all of them comply with the legislation set out in section 2.0. All 3 of these third parties are based in the USA and are [EU-U.S Privacy Shield](#) compliant.

- Google ([Privacy policy](#))
- Mailchimp ([Privacy policy](#))
- Twitter ([Privacy policy](#))

7.0 DATA BREACHES

We will report any unlawful data breach of this website's database or the database(s) of any of our third party data processors to any and all relevant persons and authorities within 72 hours of the breach if it is apparent that personal data stored in an identifiable manner has been stolen.

8.0 DATA CONTROLLER

The data controller of this website is:

St. Chad's Sanctuary, a UK registered charity with Charity Commission number: 1146151

Whose registered office is:

72 / 74 Shadwell Street, Birmingham, B4 6HA

9.0 DATA PROTECTION MANAGER

The Project Manager.

(Data Protection)

Telephone: 0121 233 3127

Email: manager@stchadssanctuary.com

Please note that St Chad's Sanctuary **does not have** a Data Protection Officer, however, The Project Manager may be contacted in the first instance.

10.0 CHANGES TO OUR PRIVACY POLICY

This privacy policy may change from time to time in line with legislation or industry developments. We will not explicitly inform our clients or website users of these changes. Instead, we recommend that you check this page occasionally for any policy changes.

11.0 SUBJECT ACCESS REQUESTS

If you wish to see the information that we store about you please contact the data protection officer (SEE 9.0) Please bear in mind that this is may be a time consuming process and may involve redaction of other data sensitive information. This process will be initiated within 5 working days, however may take up to 3 months to fully complete if the information is complex. Please also be aware that appropriately evidenced authenticity of identification needs to be provided before such a request can be started.