



Policy Name:	Data Privacy Policy
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Policy Acceptance

We, the undersigned charity trustees of Assemble Church, hereby affirm our collective acknowledgement and consent to the policy document presented herein. Having carefully reviewed its contents, we endorse and approve the policies outlined within, recognising their importance in guiding our organisation's actions and upholding our commitment to our mission. This unified agreement signifies our dedication to adhering to the principles and guidelines set forth in this policy, ensuring transparency, accountability, and the responsible stewardship of our charitable endeavours.

Key Individuals

Any mentions or references within this charitable policy document to specific roles, should be cross-referenced with the most up-to-date information available in the 'ACP00-Policies-Procedures-Key-Individuals-People-Register'. This comprehensive register is diligently maintained to ensure accurate identification of the current relevant individuals holding such roles within our organisation. It is essential to consult this register for the latest details on key personnel to maintain alignment with our governance and operational practices.

1. What Information Will We Collect?

We will collect and use information about you to enable you to get information about what's going on at Assemble so that you can connect further into the life of the church, and for Assemble Church to offer enhanced pastoral care to you. The information we collect and store includes your contact details and date of birth, information about your family, information relating to your discipleship journey and your information regarding your connection points into the church.

Assemble Church will always ask your permission for us to store this information.

In order to join some of our teams we collect further information in order for Assemble Church to process a DBS check.



If you choose to give via standing order or through card payments to Assemble Church, we also collect additional information regarding your giving. This includes Account Number, Sort-Code, Bank Name, Branch, Account Holder's Name, Card Number, expiry date, and 3-digit security code.

If you apply to work for Assemble Church we collect additional information as part of the application process, this includes: previous employment history (contact details, rate of pay), education history, and hobbies.

If you are an employee of Assemble Church we collect additional information to ensure our responsibilities as an employer can be met. This includes: National Insurance Number, information relating to any Student Loans you may hold.

2. How Will Your Information Be Used?

Your information is collected by means of Assemble Church forms (both physical and online). Our methods of collecting data include the use of:

- connect cards,
- electronic forms (on our website, Planning Center, and at the Information Station during services),
- directly into Planning Center through their website and our App,
- salvation cards,
- forms and registers (Kids, Youth, Students, Teams and Events),
- standing order forms,
- giving envelopes,
- job application forms,
- DBS checking forms

3. Personal Information

Once we receive your information it is transferred onto password protected files and saved to our online cloud based database 'Planning Center' - www.planningcenter.com. Original paper copies are shredded. The information we collect comprises name, date of birth, address, telephone numbers, email address, family names and contact details, discipleship journey information (e.g. baptism date), life group details, and team information.



The Planning Center system uses the following protocols to ensure all data is secure

3.1 Planning Center is a PCI Level One compliant merchant

The Payment Card Industry Data Security Standards (PCI DSS, or more commonly, PCI) are a set of standards set forth by the four major card associations to protect cardholder data. All merchants and processors need to have physical, electronic, and procedural controls in place to ensure that cardholder data is stored and handled securely at all times.

3.2 Technical Security and Encryption

Whenever your data is in transit between you and Planning Center, everything is sent encrypted over HTTPS, and their databases utilise encryption at rest. They limit brute force attacks with rate limiting, and all passwords are filtered from all their logs and are one-way encrypted using industry standard bcrypt.

3.3 Data Durability and Recovery

Planning Center employ a multilayered backup strategy that is designed to be resilient to hardware failure, regional disasters, and malicious acts. Both point in time backups and daily snapshots are available for use in recovery.

3.4 Security Bug Bounty

Planning Center run an ongoing bounty program through HackerOne to provide penetration testing across all of their products. These security researchers are some of the best in the world at finding vulnerabilities and responsibly disclosing them.

3.5 Physical Security

All of your data on Planning Center is stored in AWS data centers, which use industry leading practices in physical security, redundancy, and availability. You can learn more about Amazon's data centers [here](#).

3.6 Local Equipment Security

At the most basic level, Planning Center's main physical space is locked and alarmed during off hours. In the event of a break-in, since their servers don't reside in their buildings, they aren't vulnerable to smash-and-grab robberies. Local computers are password protected and encrypted. In the course of conducting customer support, employees access customer data using an encrypted connection and must invoke a time-based one-time password upon connection.



3.7 Personnel Security

To protect company data, including customer data, all employees sign a non-disclosure agreement when hired.

4. Platforms In Use

4.1 Planning Center works on a permissions based structure. Only designated Assemble Church staff and volunteers have access to the full data within Planning Center. Planning Center acts as a Data Processor for Assemble Church. Further information on how Planning Center processes your information can be found here: [Privacy Policy](#)

4.2 Assemble Church uses Yeah Tickets for all event tickets. Yeah Tickets is a trading name of Illuminate Group Limited. Yeah Tickets acts as a Data Processor for Assemble Church. Further information on how Yeah Tickets process your information can be found here: [Privacy Policy](#)

4.3 Assemble Church also uses Google GSuite with all of its staff, team leaders, ministry leaders, and key volunteers. Google GSuite acts as one of Assemble Church's Data Processors. All Assemble Church Google Accounts are password protected by 2-step security.

Further information regarding how Google processes your information on our behalf can be found here: [Data Processing and Security Terms \(Customers\)](#)

4.4 Assemble Church uses www.brighthr.com as the data processor for staff data. Further information regarding how BrightHR processes your information on our behalf can be found here: [Privacy Policy](#)

4.5 Offline Data Storage

Your information is sometimes used away from the registered office. Assemble Church permits access to Planning Center and Google Accounts outside of the office. Your information may be sent via email between Assemblechurch.com email addresses. Your information will not be emailed outside of the Assemblechurch.com domain.



Assemble Church do permit the keeping of paper registers and some forms. Paper records are always stored in locked cabinets and are transported inside folders to ensure they can not be viewed by unauthorised persons.

5. Financial Information

Standing Orders

Assemble Church does not have access to your personal banking information i.e. sort-code or account number, when you set up a standing order directly with your bank. Information related to individual transactions i.e. amount and date, are stored in our accounting system (Xero) and our bank statements. Both of these systems are only accessible by designated Assemble Church staff and volunteers.

Electronic Giving (giving online, or via Zettle terminal)

Assemble Church does not have access to your personal banking information i.e. sort-code, account number, or card number, when you give electronically via our online giving portal or using the physical Zettle terminal. Information related to individual transactions i.e. amount and date, are stored in our accounting system (Xero) and our bank statements. Both of these systems are only accessible by designated Assemble Church staff and volunteers.

Electronic Giving (payment by card using the envelope scheme)

Once we receive your information it is used to process your giving via our card payment machines. The card information on the original paper envelope copy is then cut out and shredded. Once processed your card details are not stored by Assemble Church. The remaining information on the envelope is then transferred onto password protected files and saved to our online cloud based Google Account. These password protected files can only be accessed by designated Assemble Church staff and volunteers.

The remainder of the giving envelope is kept in a secure locked cupboard for 7 years in accordance with the requirements of HMRC.

Gift Aid Information (Online Completion)



When you input your information for Gift Aid purposes into our online form designated Assemble Church staff and volunteers receive this information into their secured @assemblechurch.com email account. This information is then transferred into a central storage file and saved in a restricted access Google shared drive, accessible only to designated Assemble Church staff and volunteers. This information is held for 7 years from your last Gift Aid eligible giving, in line with HMRC requirements.

Your information is also used as part of applications to HMRC for Gift Aid purposes. These applications are submitted via the HMRC online portal, and copies of the applications are stored on a restricted access Google shared drive.

Gift Aid Information (Physical Form Completion)

When you provide your Gift Aid information via a physical form, this information is collected by a designated Assemble Church staff member or volunteer, and transferred into a central online storage file and saved in a restricted access Google shared drive, accessible only to designated Assemble Church staff and volunteers. This information is held for 7 years from your last Gift Aid eligible giving, in line with HMRC requirements. In the case of a physical form your information will be kept digitally for 7 years, as well as the physical form being kept in a secure locked cupboard for 7 years.

Your information is also used as part of applications to HMRC for Gift Aid purposes. These applications are submitted via the HMRC online portal, and copies of the applications are stored on a restricted access Google shared drive.

6. DBS Applications

DBS status, where applicable, is stored on Google Drives administered by Assemble Church's Safeguarding Officers. These password protected files can only be accessed by designated Assemble Church staff. The records of DBS searches are recorded simply as status, viz. submitted, clear etc. Original paper DBS disclosures are destroyed.

DBS applications are processed through Groundlevel. Groundlevel acts as a Data Processor for Assemble Church in regard to DBS applications. To view how Groundlevel will handle your information please visit: <https://www.groundlevel.org.uk/privacy-policy>



6. Job Applications

All job applications to Assemble Church are received through the email administration@Assemblechurch.com. Once we receive your information it is stored on a password protected Google Account. These password protected files can only be accessed by designated Assemble Church staff and trustees as required.

7. Employees

All information regarding those who are employed by Assemble Church is stored on a password protected Google Account and with www.brighthr.com. These password protected files can only be accessed by designated Assemble Church staff.

You can find further information about how brighthr processes your information by visiting: [Privacy Policy](#)

You can find out further information about how Wright Vigar processes your information by visiting: [Privacy Policy](#)

8. Photography & Videography

Here at Assemble we categorise Photos and Videos into 2 categories:

8.1 Photos of activities and human interaction:

Photos that show activities of the church that could not be deemed as revealing 'religious beliefs'. Photos such as shots in social spaces, conversations, community groups, life group socials etc.

In this instance Assemble Church do not seek to gain explicit consent from you. We will never publish or use your photo with any other data that can identify you (such as your name) without your explicit consent

8.2 Photos of 'Religious Beliefs' and photos of Children, young people, and vulnerable adults:

Photos that show activities such as worship, prayer, baptism, dedication etc. or photos of children, young people or vulnerable adults:



In this instance:

8.2.1 Assemble Church will only ever take, store, and use your photo having ensured you (or your parent/guardian) have given explicit permission for us to do so.

8.2.2 That consent will be a written record, signed, and dated, Planning Center record, or equivalent e.g. a text message giving consent, which is from a number or profile linked to you (or your parent/guardian), and has a date and time stamp

8.2.3 We will never take, store, share, or use a photo or video of you without your (or your parent/guardian's) explicit permission.

8.2.4 You (or your parent/guardian) can decide not to grant us explicit permission to take, store, share, or use a photo or video of you.

8.2.5 You (or your parent/guardian) can withdraw your explicit permission at any time and ask us to delete any photos or video that we hold.

9. When We Can Use Your Information

We collect and use your information in the following situations:

9.1 Where we believe it is necessary to use your information to comply with a legal obligation to which we are subject;

9.2 Where our use of your information is for the purposes of our legitimate interests and we have made sure that your information, and your rights in relation to that information, are protected;

9.3 Where we have your consent. We will rely on your consent to use your information for marketing to you by email, text message, and other methods of electronic communication from time to time in accordance with your data choices.

Where we rely on consent to use your information, you have the right to withdraw that consent at any time. Please see the 'Your choices and rights' section of this policy for more details.



10. Who Will We Share Your Information With?

10.1 Facebook Messenger + Groups

A number of the Teams and Life Groups across Assemble use Facebook Messenger and Facebook Groups/Pages to communicate with team and life group members. You can find more information on how Facebook handle your information here: <https://www.facebook.com/about/privacy/update>

10.2 MailChimp

Assemble Church uses Mailchimp to send emails regarding upcoming events, newsletters, and team and connect group updates. Assemble Church treat Mailchimp as one of our Data Processors. You can find more information on how mailchimp handle your information here: <https://mailchimp.com/legal/privacy>

We promise we will never share your information with anyone else.

11. The Period For Which We Will Keep Your Information

We will keep your information for as long as is necessary for us to fulfil the purposes that we describe in this policy.

Your information is deactivated and/or destroyed at your request, on your death, or once you have left the church following a period of 6 months of non-attendance. This excludes any financial information that we are required to keep for 7 years, in accordance with HMRC requirements outlined above.

12. Your Choices And Rights

You have a number of rights in relation to your information, and can make a number of choices about how we collect and use it. For example, you can decide not to receive marketing material from us, tell us how you want to receive communication from us, and object to some of the ways in which we use your information.



Please note that some of the choices or changes you make may impact our ability to communicate with you, pastor you, and connect you to groups and teams that may benefit you.

You can log into Planning Center at www.planningcenter.com to:

- 12.1** Access and update the contact and personal details we hold about you
- 12.2** Opt-out of receiving communications to your device and/or telephone including calls to your mobile or other number, SMS, post, and emails from us.

You can contact us using the details below to:

- 12.3** Request access to your information if you cannot locate it in Planning Center, www.planningcenter.com
- 12.4** Ask that we update, complete, or correct your information if you are unable to do so in Planning Center, www.planningcenter.com
- 12.5** Ask that we erase or restrict our use of your information
- 12.6** Request that we provide your information to you in a commonly used electronic format and to have that information transmitted directly to another organisation (this is known as the right to data portability)
- 12.7** Object to Assemble Church using your information in certain circumstances.

If you are concerned about how your information is used, please contact us at administration@Assemblechurch.com or FAO Data Protection Lead, Assemble Church, Northgate Business Centre, 38-40 Northgate, Newark Upon Trent, Nottinghamshire, NG24 1EZ.

Alternatively, you have the right to complain to the Information Commissioner's Officer.

13. Who We Are

We are Assemble Church, Registered Charity No: [1140435]. Registered Company No: [7494717]. A company limited by guarantee having no share capital. A member of the Assemblies of God denomination. Part of the Groundlevel Network of churches.

Our registered office is Assemble Church
Northgate Business Centre
38-40 Northgate



Newark Upon Trent
Nottinghamshire
NG24 1EZ

Get in touch by contacting the Data Protection Lead at the above address, or you can contact the church on 01636 556110 to raise any questions or concerns.