

Hillsong General Data Protection Policy



UK

Date: 28th December 2018

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Introduction

This policy describes the procedures, guidelines and policies that Hillsong Church London (“**Hillsong**”) has put into place in order to comply with the General Data Protection Regulation (**GDPR**) and the UK Data Protection Act 2018 (together “**the Law**”). It applies to all Employees and Volunteers of Hillsong.

This policy should be read alongside other key policies.

Hillsong collects and manages information about people on the basis of specific consent and our legitimate interests as a registered charity.

If there is any uncertainty regarding this Policy, Employees and Volunteers must contact the Hillsong Data Protection Office for clarification before taking any action.

Policy Scope

This policy applies to all Hillsong teams and departments.

This policy is based on the GDPR principles. It outlines the rights granted to individuals and defines how these principles and rights are addressed in Hillsong operations, departments, and activities.

Hillsong Privacy Policies

The “**Hillsong Privacy Policies**” consist of the Hillsong Privacy Policy and the MyHillsong Privacy Policy.

The **Hillsong Privacy Policy** (hillsong.com/privacy) governs the way in which Hillsong collect, use, disclose, transfer, store, retain or otherwise process individuals’ information. The Privacy Policy details:

- how personal information is collected
- the types of personal information that is collected
- how the information is used
- the legal basis for collecting personal information
- data storage and data sharing / access
- data retention
- use of cookies (to be read alongside the Hillsong Cookies Policy)
- individual rights
- security
- links and social media
- data protection contacts and regional Hillsong representatives.

The **MyHillsong Privacy Policy** governs the way in which Hillsong collect, use, disclose, transfer, store, retain or otherwise process individuals’ information when provided through MyHillsong.com.

The **Hillsong Cookies Policy** (hillsong.com/policies/cookies-policy) governs the way in which Hillsong collects and uses information from activity on devices and should be read alongside the Hillsong Privacy Policies.

Data Protection Principles

- 1. Lawfulness, fairness and transparency**
Lawfulness: data processing must meet the tests outlined in the Law;
Fairness: data handling must be reasonable and justifiable;
Transparency: the subject must be told what data processing will be done.
- 2. Purpose limitation**
Be clear about why the data is being collected, make a record of these purposes, and only use the personal data in line with the specified purpose for which it was originally processed.
- 3. Data minimisation**
The data being processed must be adequate, relevant and limited to what is necessary to fulfil the purpose for which it was collected.
- 4. Accuracy**
All data must be accurate and keep it up to date. Any inaccuracies must be corrected or erased as soon as possible.
- 5. Storage limitation**
Data cannot be kept for longer than is necessary.
The **Hillsong Data Retention Policy and Data Deletion Schedule** address this requirement.
- 6. Integrity and confidentiality**
The data must be kept securely at all times.
- 7. Accountability**
Appropriate measures and records must be in place to demonstrate compliance with the above principles.

Rights of Individuals

The regulations demand that individuals must have the following rights in relation to their personal data being processed:

- 1. The right to be informed**
Individuals must be told about the collection and use of their personal data. This includes the purposes for processing their data, the data retention period, who it will be shared with and where data will be stored.
- 2. The right of access**
Individuals have the right to access their personal data, known as a Subject Access Request. This can be made verbally or in writing, a response must be made within one month and no fee can be charged to deal with the request.
- 3. The right to rectification**
Individuals have the right to have inaccurate data rectified, or completed where it is incomplete or misleading. The request can be made verbally or in writing.
- 4. The right to erasure**
Known as the 'right to be forgotten' this gives individuals the right to have personal data erased when it is no longer necessary. The right is not absolute but only applies in certain circumstances. The request can be made verbally or in writing. Deletion and response must take place within 30 days of the request.
- 5. The right to restrict processing**

Individuals have the right to request the restriction or suppression of their personal data. It is not an absolute right and only applies in certain circumstances. Such personal data may be stored but not used. The request can be made verbally or in writing and a response must be made within one month.

6. The right to data portability

This only applies to information an individual has provided, and gives the right to obtain and reuse that data for their own purpose.

7. The right to object

Individuals have the right to object to the processing of their data in certain circumstances, for example for use for direct marketing. An objection can be made verbally or in writing and a response must be made within one month. Processing can continue if there is a compelling reason for doing so.

8. Rights in relation to automated decision making and profiling

Automated decision making must be necessary, authorised, and express consent must be given. Individuals must be able to request human intervention or challenge a decision.

Agreements and Training

Hillsong requires all Volunteers to sign and adhere to the Hillsong Volunteer Agreement which details the procedures and expectations that individuals must follow while in any volunteer role with Hillsong.

All Employees and Volunteers are required to sign and adhere to the Hillsong Confidentiality Agreement and to undergo data protection training and assessment.

In the training process, Employees and Volunteers are required to:

- Watch the Data Protection Training video
- Complete the Data Protection Test
- Undergo yearly Data Protection re-training
- When instructed, complete Safeguarding Training.

Training tools and procedures are regularly updated.

Collection of Data

Collection Notices

When data is obtained from an individual, the following information must be made clear to the data subject at the time of collection:

- The identity and the contact details of the organisation behind the data request
- The purpose of acquiring the data and how it will be used
- Whether the data will be transferred internationally
- The period for which the data will be stored
- The individual's right to access, rectify or erase the data
- The individual's right to withdraw consent at any time
- The individual's right to lodge a complaint

When printed material is used to collect personal information:

- A Collection Notice must be printed on the material.
- New to Church Cards, Groups Cards, and New to Team Cards may no longer be used to collect information.
- Prayer & Praise Cards may be used to collect information and must include a Collection Notice.

- On Prayer Cards, individuals can give consent to being contacted. If no consent is given the cards are immediately shredded. If consent is given, the card is scanned and uploaded to Microsoft SharePoint and stored for 30 days, the hard copy is shredded.
- Praise Cards are used in the church service subsequent to submission of the card and immediately shredded afterward.

Informal data collection

Hillsong collects data as outlined in the Privacy Policy.

When Employees and Volunteers informally collect data in writing or orally, such as when individuals provide contact details or family information, they must:

- Do so in accordance with the Privacy Policy
- Always explain why and for what purpose the information is being collected
- Only use the data for the reason the individual originally agreed to (for example to call to invite them to a group)
- Within four weeks, delete the information from all storage devices or hard copy notes once the purpose for data collection has been fulfilled, unless regular contact with the individual has been established
- Not record any personal information other than what has been agreed on (for example, details of the individual's family)
- Not share the information with anyone else unless this has been specifically agreed to
- Inform individuals of MyHillsong as a means to give consent to receive regular communication.

Formal data collection

New methods of formal data collection including forms, notices and databased, are not permitted without prior approval from Adam Spies and once created must be approved by the Legal Department before use.

Data Storage

MyHillsong:

- MyHillsong is the main database of personal information for Hillsong
- Use is governed by the MyHillsong Privacy Policy
- Is the central location for storing consent and communications preferences
- Under 16's cannot create their own account
- Accounts cannot be set up on someone else's behalf by any third party including Hillsong Employees or Volunteers.

Planning Centre:

- Used to manage Hillsong teams, volunteers and Groups
- All individuals on Planning Centre must have a MyHillsong account
- Consent forms must be signed before individuals are added
- Group Leader Agreements must be signed before the Groups are added
- Privacy Notice must be added to each individual Group signup page

SharePoint:

- A web-based, collaborative platform that integrates with Microsoft Office
- Primarily a document management and storage system

- A secure system
- Used to store personal data of individuals who have given us specific consent to keep their data (including but not limited to consent forms, confidentiality agreements, volunteer agreements, pastoral care notes)
- Holds approved templates and forms to be used for data collection by Hillsong Employees and key Volunteers (including but not limited to photography deeds, parental consent forms, volunteer agreements)
- Stores the data protection training documents, guidelines and templates

Personal devices:

- Personal data may only be recorded on personal devices when specific consent has been given (see *Collection of Data : Informal Data Collection*, above)
- Data may not be transferred to and/or stored on any **personal** unauthorised lists, spreadsheets, mailing lists, google docs, notes or any other method of data storage
- Data may not be transferred to and/or stored on any **shared** unauthorised lists, spreadsheets, mailing lists, google docs, notes or any other method of data storage
- Any personal data, including but not limited to, names, phone numbers, email addresses and photos, must be deleted within the designated time frame (see *Data Retention*, below) unless a personal relationship has been established.

Data Sharing

Data may only be shared when prior specific consent has been given, or where authorised or required to do so by law.

Details are provided in the Hillsong **Privacy Policies**, the Hillsong **Protection Policy** and the Hillsong **Pastoral Care Policy**.

Email addresses, phone numbers and other personal information cannot be shared between Hillsong Employees, Volunteers, or any third party without this consent or authorisation.

Data Retention

Hillsong retain data for the period of time necessary or as required by law.

Full details of all data retained, the schedule for deletion of data, and the responsibility for management of deletion, is contained in the Hillsong **Data Retention Policy and Deletion Schedule**.

Deletion is the responsibility of the Designated Person as per the Deletion Schedule.

The Hillsong Data Protection Office performs routine checks on all departments to ensure that all data is being deleted in accordance with the Deletion Schedule.

Personal Data Breaches

Under the Law a “personal data breach” is defined as “a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.”

Breaches can include the following:

- Unauthorised access, when personal information is accessed by any person or third party who is not permitted to do so.

- Unauthorised disclosure, when Hillsong intentionally or unintentionally makes personal information accessible or visible to parties who should not receive or view the information, and releases that information from our effective control.
- Loss of personal information refers to accidental loss of personal information resulting in unauthorised access or disclosure.
- Alteration of personal data without permission.
- Loss of availability of personal data.
- Deliberate or accidental action (or inaction) by a controller or processor.

Examples include:

- Sending personal data to an incorrect recipient via email or text messaging
- Computing devices containing personal data being lost or stolen.

Data Breach Procedure

Under the Law, when a breach has occurred, Hillsong must establish “the likelihood and severity of the resulting risk to the people’s rights and freedoms.”

Where there is a risk, the breach must be reported to the Information Commissioners Office (“**ICO**”) within 72 hours.

Every breach or potential breach must be documented so that there is a record of the decision to report / not report.

On becoming aware of a breach, Employees or Volunteers must immediately report it to the relevant Team Leader and the Hillsong Data Protection Office.

Deletion Requests

An individual can request that Hillsong delete all personal data held on them. The request can be made by text, email, in person, or by phone call.

If a deletion request is made to an Employee or Volunteer, they must advise the Hillsong Data Protection Office immediately.

Hillsong have 30 days to complete the request and respond to the individual.

Full details of the deletion request procedure are contained in the Hillsong UK DPO – Deletion Process document.

Subject Access Requests (“SARs”)

An individual has the right to obtain confirmation as to whether or not Hillsong is processing their personal data, and access that data.

If a SAR is made to an Employee or Volunteer, they must advise the Hillsong Data Protection Office immediately.

Identity verification will take place before any information is released to the individual.

Hillsong have 30 days to complete the request and respond to the individual.

Full details of the SAR procedure are contained in the Hillsong UK DPO – SAR Process document.

Under 16’s

All policies apply to Under 16’s however there are special conditions which override the standard terms. This Policy is to be read alongside the Hillsong **Under 18’s Volunteer Policy**.

Procedures for regular Sunday church activities involving Under 16's are provided in the **Hillsong Kids Policy** and the **Hillsong Youth Policy**.

For all activities and events where Under 16's may be involved, a risk assessment must be completed and submitted to the Legal Department prior to the activity or event.

Adult / child ratios appropriate for the age of the children, for the specific type of activity, must be adhered to. The adult / child ratios for regular activities or events are based on the NSPCC recommendations and are as follows:

- 1 – 2 years old, 1:3
- 3 – 4 years old, 1:4
- 5 – 6 years old, 1:6
- 7 – 12 years old, 1:8
- 13 – 18 years old, 1:10

For additional events or activities, a risk assessment must be completed and supervision levels must be increased based on:

- the behaviour and ability of the children in the group
- the nature, duration and location of the activity
- the experience and skill of the adult supervisors

Any Hillsong Employee or Volunteer involved in activities or events with Under 16's must read, understand and adhere to the **Protection Policy**.

Parental consent:

- is required for all activities, events and involvement;
- must be provided by the parent / caregiver in the form of a signed and completed Hillsong Parental Consent Form (amended for the specific activity / event) in hard copy or online;
- must be specifically given for each activity or event;
- may be given for a period of one year where an activity or event is regular / recurring, after which point re-consent must be given.

Photography:

- full procedures are outlined in the Hillsong **Photography Policy**;
- written parental consent is required before any photography and/or filming takes place involving Under 16's;
- images and/or recordings may not be used in any context, including social media, without prior written parental consent;
- consent must be in the form of the Hillsong Photography Consent Deed;
- consent may be withdrawn for future use of images and/or recordings, however consent may not be withdrawn for current images and/or recordings that are already in use or circulation.

Volunteering:

- where under 16's are to be involved in volunteering, it is to be run as an Under 16's activity;
- parental consent will be required (see above);
- adult / child ratios must be followed and Under 16's involved in volunteering must be counted in the 'child' allocation of the relevant ratio requirements (see above);
- risk assessments for each child and activity must be completed prior to involvement.

Events

Events can only be organised once authorisation has been given by the relevant Department Head.

This policy must be read alongside the Hillsong **Events Policy** which details the requirements for organising, promoting and running a Hillsong event or activity.

Brushfire

Where an event requires payment and/or registration, this may only be done online through Brushfire.

All events posted on Brushfire require the Hillsong Terms and Conditions ("**The T&C's**") to be included at the point at which registrant details are entered.

Adult and Under 16's versions of The T&C's are available on SharePoint, and the correct version must be used. If both under and over 16's are able to register for one event, the correct T&C's must be provided based on the age entered.

Where any changes are required to the standard T&C's, the organiser must request the changes be made by the Legal Department.

Under 16's

Where Under 16's are able to attend an event, full parental consent forms are to be completed prior to the event (see above "Under 16's: Parental Consent").

Free events

Where events do not require payment, but where registration or expressions of interest can be made via the Hillsong.com Calendar and personal information such as a name and contact information is requested, the following Privacy Statement must be included:

"The information you provide will be used strictly for contacting you in accordance with your request. All information held by us is in accordance with the Hillsong Privacy Policy which can be found at hillsong.com/privacy."

Where events are listed on the Hillsong.com Calendar and provide a contact email address, it must be a Hillsong email address and the following Privacy Statement must be included:

"When you contact us by email, your personal details will be used strictly for contacting you in accordance with your request. All information held by us is in accordance with the Hillsong Privacy Policy which can be found at hillsong.com/privacy."

Photography / Filming at events

If photography / filming is going to take place at events, the Hillsong **Photography Policy** must be read and adhered to.

Photography consents to be filled out for all under 16's in attendance and signage must be present to the following effect:

"We may be photographing and/or filming here today. If you do not wish to appear in any of the content captured, please speak to one of our Volunteers. Content may be used by Hillsong churches globally for broadcast, commercial and/or promotional purposes, published on our website and social media. Content will be held in accordance with our Privacy Policy (hillsong.com/privacy) and we retain the right to assign, sub-licence or use the content in any way."

While The T&C's used on Brushfire include terms regarding photography/filming, where close-up images of individuals are taken with the intention of using for promotional and/or commercial purposes, written consent should be given in the form of the Hillsong Photography Consent Deed.

Insurance

Insurance must be obtained for events or activities that take place off church premises.

Clearance from the Legal Department must be given before the event is promoted.

Requirements may include, but are not limited to, provision of venue Public Liability Insurance and completion of activity and event risk assessments.

Records of events

Personal data of individuals registering or attending events may be kept to use in accordance with the management of the event.

Unless specific consent has been given to retain contact information, it must be fully deleted when no longer required for the management of the event.

If organisers intend to keep a record of personal details in order to contact attendees about future events, consent to do so must be obtained at the point of event registration on Brushfire. A consent box with the following statement may be added to initial registration:

"Yes, please let me know about the next [event name] event."

Phone numbers and details taken down during the course of the event must be deleted unless a personal relationship is developed.

Data to be used for reporting, future planning, or other statistical purposes, must be anonymised such that no personal information or individual is identifiable.

Photography

The Hillsong **Photography Policy** must be read and adhered to before any photography and/or filming:

- takes place at any Hillsong event or activity
- is taken for promotional, commercial or other purposes
- is used in any way connected to Hillsong.

The Photography Policy details:

- the policy relating to photography and/or filming of Under 16's
- when consent forms and deeds are required
- photography at events
- the use of signage when photography and/or filming is to take place
- the definitions of crowd images and individual images and relating procedures
- copyright issues to be considered

Internet and Email Usage

Employees and Volunteers must read and adhere to the Hillsong **Internet and Email Usage Policy**.

Users must not share, link to, use or store any information in a way that could breach the Hillsong **Privacy Policies**.

Where Employees or Volunteers have collected an email address, such personal data may only use for the specific purpose for which it was collected. If the email address is no longer required or there has not been a response from the individual, the email address must be deleted from the Employee or Volunteers personal devices within 30 days.

Where a deletion request has been made by an individual, all correspondence with that individual and the email address itself must be deleted, with the exception of the record held by the Hillsong Data Protection Office.

Group mailouts for promotional / general information purposes are to be sent by authorised Employees only. All such emails are to be in the form of a Hillsong Email Template and must be cleared by the Communications Department before being sent.

Communications

The Hillsong Communications Department is responsible for all external communications of Hillsong.

The Hillsong **Communications Policy** details the procedures under which this department operate, including those procedures relating to copyright, trademarks, photography, and data protection.

The Communications Policy is to be read alongside the Hillsong **Privacy Policies** and the Hillsong **Photography Policy**.

Employees and Volunteers cannot create, distribute or promote any material that in any way claims to be created by, connected to, or sponsored by Hillsong, without authorisation from the Hillsong Communications Department.

Consent to be contacted is managed by the individual's communications preferences. No direct contact can be made to individuals who have not given specific consent for such contact, unless required by law.

Social Media

Employees and Volunteers must read and adhere to the Hillsong **Social Media Policy**.

Users must not share, link to, use or store any information in a way that could breach the Hillsong **Privacy Policies**.

Users must not share or link to any content or information owned by Hillsong, or any other company or individual, that could be considered confidential or commercially sensitive.

Third Parties

Hillsong will only use the services of, or contract with, third parties or organisations who meet the relevant Data Protection requirements.

Approved third parties and organisations that can be used:

- Brushfire
- Mailchimp
- JonesApp
- Planning Centre
- Drop Box
- iZettle
- Text Local

- Formstack
- Square
- VendUK

Policy Enforcement

Knowingly breaching this policy is a serious matter. Employees and Volunteers who do so may be subject to disciplinary action and may be held personally liable to violating this policy. If you are unclear as to what is expected in any situation or need clarification on any issue raised, contact the Data Protection Officer or The Legal Department of Hillsong Church London.

Contacts

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