

## **Privacy Policy** (Last updated 20<sup>st</sup> January 2019)

### **Introduction**

This Privacy Policy sets out the basis on which any personal data we collect from you through the website: <https://capernwrayaustralia.org> and <https://toas.capernwrayaustralia.org>, or that you provide to us, will be processed by us. This Privacy Policy also sets out your rights to control personal information we hold about you. Please read this Privacy Policy carefully in order to understand our practices regarding your personal data and how we will treat it.

### **Who we are**

Capernwray Torchbearers Australia's registered office is at: Capernwray Torchbearers Australia, 596 Moss Vale Road, Burradoo, NSW Australia 2576.

We are committed to protecting and respecting your privacy and will only process personal data you provide to us in accordance with applicable privacy laws (e.g. GDPR).

For all data matters please contact Peter Thomas: [director\(at\)capernwrayaustralia.org](mailto:director(at)capernwrayaustralia.org).

### **Definitions**

**“Data controller”** - determines the purposes and means of processing personal data and means Capernwray Torchbearers Australia in this Privacy Policy;

**“Data processor”** - is responsible for processing personal data on behalf of a data controller;

**“Data subject”** - a natural person;

**“Personal data”** - any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier, for example name, passport number, home address or private email address and online identifiers include IP addresses and cookies;

**“Processing”** - any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

**“Special categories personal data”** - the special categories specifically including genetic data, and biometric data where processed to uniquely identify an individual and other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs;

**“Third party”** - a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

## 1. If you are under 16

We do not and will not knowingly collect information from any unsupervised minor under the age of 16. If you are under the age of 16, you may not use our website unless you have the consent of, and are supervised by, a parent or guardian.

## 2. The purpose(s) of processing your personal data

We use your personal data for the following purposes:

- Communicating with students;
- Providing benefits and services to students;
- Furthering our charitable mission.

## 3. The categories of personal data concerned

With reference to the categories of personal data described in the definitions section, we process the following categories of your data:

**Personal data** including, without limitation:

- your name, sex and date of birth;
- your postal address;
- your phone and email address;
- where relevant, your parent/guardian and their contact details;
- your personal image (photo);
- your education records;
- your career and employment history;
- your marital status and details of any children;
- your nationality, passport and social security number;

We process **special categories of data** including, without limitation:

- your health, including any disability;
- dietary requirements;
- your ethnic origin;
- your race;
- your religion (including place of worship);
- any criminal offences you have committed;
- your physical and mental health history.

The information we hold is obtained directly from our forms that you have filled in.

## 4. What is our legal basis for processing your personal data?

### a) Personal data

We process your personal data in pursuit of our legitimate interest in fulfilling the purposes set out in Section 3 of this Privacy Policy.

Whilst we rely on legitimate interest as the legal basis for processing, where this is not overridden by the interests and rights or freedoms of the data subjects concerned, we recognise that it is not the only lawful ground for processing data. As such, where appropriate, Capernwray Torchbearers Australia will

sometimes process your data on an alternative legal basis – for example, because you have given us consent to do so, or to fulfil contractual obligations we may have when you request services from us.

We may also need to disclose your information to a third party if required by law (for example to government bodies and law enforcement agencies), including for the purposes of investigating a complaint, or if we have your permission to do so.

#### **b) Special categories of personal data**

To the extent we process your special categories of personal data, in addition to pursuing our legitimate interest in fulfilling the purposes set out in Section 3 of this Privacy Policy, we have obtained your explicit consent, or it may be necessary for reasons of public interest in the area of public health.

### **5. Sharing your personal data**

Your personal data will be treated as strictly confidential.

Please note, however, that we may need to disclose your information to a third party if required by law (for example to government bodies and law enforcement agencies) or where we have your permission to do so.

### **6. How long do we keep your personal data?**

We keep your personal data only as long as is necessary for the purpose(s) for which it was collected (unless otherwise advised). Data will be kept securely and destroyed when no longer required. We may also decide to archive some data.

### **7. Providing us with your personal data**

We require you to provide us with your personal data in order for us to fulfil the purposes set out in Section 3 of this Privacy Policy.

### **8. Your rights and your personal data**

Unless subject to an exemption under applicable data protection laws, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to withdraw your consent to the processing of your special categories of personal data at any time, where consent was the lawful basis for processing such data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable i.e. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

## **9. Transfer of Data Abroad**

All personal information that you submit via the Website is sent to, processed by and stored by a third party data processor outside the European Union.

All personal information that you submit via TOAS (<https://toas.capernwrayaustralia.org>) is sent to, processed by and stored by a third party data processor within the European Union. Some data however is sent to, processed by and stored by a third party data processor outside the European Union.

Please be aware that not all countries offer the same level of data protection as your home country, although our collection, storage and use of your personal data will continue to be governed by this Privacy Policy.

## **10. Links**

Our website contains links to other websites operated by third parties. Please note that this Privacy Policy applies only to the personal information that we collect and we cannot be responsible for personal information that third parties may collect, store and use through their website. You should always read the Privacy Policy of each website you visit carefully.

## **11. Cookies**

Cookies are widely used to make websites work, or work more efficiently, as well as to provide information to the owners of the site by placing small text files on your computer when you visit the website.

You may change your website browser settings to reject cookies, although please note that if you do this it may impair the functionality of our website. For further information about cookies, including how to refuse cookies, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

## **12. Online Application Forms**

We use following third-party provider:

Samuel Weirich, Grünberger-Str. 19, 35390 Giessen, Germany: platform provider, all data processed and stored within the European Union

<https://neverbounce.com/>: to verify the email addresses (email address)

<https://www.mailgun.com/>: to send emails to the applicant, registrar and referee (first name of the applicant, family name of the applicant, family name of the registrar, email of the registrar, name of the bible school, first name of the referee, family name of the referee).

We use these third-party providers to collect data on our behalf if you apply at Capernwray Torchbearers Australia. This third-party provider is a data processor for us and only process personal information in accordance with our instructions.

## **13. Social Media**

Third-party providers, including: Facebook, Instagram, Twitter, Vimeo and YouTube.

If you send us a private or direct message via social media, the message will be stored by a third-party provider. However, we will not share this with any other organisations.

## **14. Emails**

We monitor any emails sent to us for viruses or malicious software, including file attachments. Please be aware that you have a responsibility to ensure that any email you send is within the confines of the law.

## **15. Security and Performance**

We use a third-party service to assist in maintaining the security and performance of our website, which requires the processing of website user's IP addresses to do so. Whilst we take appropriate technical and organisational measures to safeguard the personal information that you provide to us, no transmission over the Internet can ever be guaranteed secure. Consequently, please note that we cannot guarantee the security of any personal information that you transfer over the Internet to us.

## **16. Automated Decision Making**

We do not use any form of automated decision making.

## **17. Further processing**

If we wish to use your personal data for a new purpose not covered by this Privacy Policy, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

## **18. Changes to our Privacy Policy**

Please check back regularly to keep informed of updates to this Privacy Policy as you will be deemed to have accepted any changes if you continue to use our website after an update has been posted.

## **19. How to make a complaint**

We endeavour to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously and encourage individuals to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate, and welcome any suggestions for improving our procedures.

To exercise all relevant rights, queries or complaints please feel free to contact Peter Thomas: [director\(at\)capernwrayaustralia.org](mailto:director(at)capernwrayaustralia.org).

If this does not resolve your complaint to your satisfaction and you are a citizen of the EU, you have the right to lodge a complaint with the data protection regulator of your country.