

## Privacy policy

This privacy policy gives you information about how AZ Alliance collects and uses your personal data, including any data you may provide when you register with us or sign up to our newsletter.

This website is not intended for children and we do not knowingly collect data relating to children.

## Controller

AZ Alliance is the controller and responsible for your personal data (collectively referred to as "we", "us" or "our" in this privacy policy).

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the us using the information set out in the contact details section.

### 1. The types of personal data we collect about you

Personal data means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, any previous names or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments or any financial contributions you have made.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.
- **Special Categories of Personal Data** includes any church or Network you may be affiliated with.

### 2. How is your personal data collected?

We collect data from and about you when you give us your personal data by filling in online forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you subscribe to our mailing list or contact us. We may also collect Contact, Financial and Transaction Data from providers of technical and payment services.

### 3. How we use your personal data

#### Legal basis

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- **Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any

potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

- **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.
- **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to an email newsletter.

## Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use the various categories of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Use	Type of data	Legal basis and retention period
To process and manage payments	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	Necessary to comply with a legal obligation  We will retain this data for 6 years from the year end of the last transaction
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Dealing with your requests, complaints and queries	(a) Identity (b) Contact (c) Marketing and Communications (d) Special Categories of Personal Data	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (to keep our records updated and manage our relationship with you) (c) Explicit consent  We will retain this data for 6 years
To administer and protect our activity (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Special Categories of Personal Data	(a) Necessary for our legitimate interests (for running our activity, provision of administration and IT services, network security and to prevent fraud) (b) Necessary to comply with a legal obligation (c) Explicit consent  We will retain this data for 6 years
To deliver relevant content and communications to you and measure or understand the effectiveness of this	(a) Identity (b) Contact (c) Marketing and Communications	(a) Necessary for our legitimate interests (to measure impact and to inform our strategy) (b) Explicit consent

	(d) Special Categories of Personal Data	We will retain this data for 6 years
To carry out market research through your voluntary participation in surveys	(a) Identity (b) Contact (c) Marketing and Communications (d) Special Categories of Personal Data	(a) Necessary for our legitimate interests (to help us improve and develop our content, resources and services). (b) Explicit consent We will retain this data for 6 years

**4. Direct marketing**

During the sign-up process, your personal data is collected and you will be asked to indicate your preferences for receiving direct marketing communications from AZ Alliance via email, SMS, phone or post.

**Opting out of marketing**

You can ask us to stop sending you marketing communications at any time by following the opt-out links within any marketing communication sent to you or by emailing us at [info@alliancecofe.org](mailto:info@alliancecofe.org).

If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer service purposes.

**5. Disclosures of your personal data**

We may share your personal data where necessary. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

**6. International transfers**

We may transfer your personal data to service providers that carry out certain functions on our behalf. This may involve transferring personal data outside the UK to countries which have laws that do not provide the same level of data protection as the UK law.

Whenever we transfer your personal data out of the UK to service providers, we ensure a similar degree of protection is afforded to it by ensuring that the following safeguards are in place, which include the use of specific standard contractual terms approved for use in the UK which give the transferred personal data the same protection as it has in the UK, namely the International Data Transfer Agreement or The International Data Transfer Addendum to the European Commission’s standard contractual clauses for international data transfers. To obtain a copy of these contractual safeguards, please contact us at [info@alliancecofe.org](mailto:info@alliancecofe.org).

**7. Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to

know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

## **8. Data retention**

### **How long will you use my personal data for?**

Details of retention periods for different aspects of your personal data are set out in the table above.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for compliance purposes.

In some circumstances you can ask us to delete your data (see below for further information).

## **9. Your legal rights**

You have a number of rights under data protection laws in relation to your personal data.

You have the right to:

- Request access to your personal data (commonly known as a "subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data in certain circumstances. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes (see paragraph 3 for details of how to object to receiving direct marketing communications).
- Withdraw consent at any time where we are relying on consent to process your personal data (see the table in section 3 for details of when we rely on your consent as the legal basis for using your data). However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain

products or services to you. We will advise you if this is the case at the time you withdraw your consent.

- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
  - If you want us to establish the data's accuracy;
  - Where our use of the data is unlawful but you do not want us to erase it;
  - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
  - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, please contact us (see Contact details in paragraph 10).

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **10. Contact details**

If you have any questions about this privacy policy or about the use of your personal data or you want to exercise your privacy rights, please contact us in the following ways:

- Email address: [info@alliancecofe.org](mailto:info@alliancecofe.org)
- Postal address: AZ Alliance Ltd, 3rd Floor Suite, 207 Regent St, W1B 3HH

## **11. Complaints**

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the

chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## **12. Changes to the privacy policy and your duty to inform us of changes**

We keep our privacy policy under regular review. This version was last updated on 9<sup>th</sup> February 2024.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example a new address or email address.

## **13. Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.