



THE CHRISTIAN  
HERITAGE CENTRE  
at Stonyhurst

## PRIVACY POLICY

Approved by the Board March 2023  
Review date March 2024

For where your treasure is there will your heart be also *Matthew 6:19-21*

Tel. 01254 827329 Email: [bookings@christianheritagecentre.com](mailto:bookings@christianheritagecentre.com)  
The Christian Heritage Centre, Stonyhurst College, Clitheroe, BB7 9PT Website: [www.christianheritagecentre.com](http://www.christianheritagecentre.com)

UK Registered charity no: 1149129 / UK Registered company no: 08095123



## Introduction

This privacy policy will explain how the Christian Heritage Centre at Stonyhurst will treat your personal data as you make use of our services.

1. Who are 'we'?
2. What is personal data?
3. What data do we collect?
4. What do we use your personal data for?
5. Who do we share your data with?
6. How do we protect your personal data?
7. Retention of personal data
8. Your rights
9. Changes to our privacy policy
10. How can you access, update or delete your personal data?

### 1. Who are 'we'?

The Christian Heritage Centre at Stonyhurst (from now on referred as the CHC) refers to the registered charity that is based on the site of Stonyhurst College. Any references to 'We' or 'Us' refers solely to this charitable body.

We own a subsidiary company – The Christian Heritage Centre at Stonyhurst Trading Ltd - which operates under the trading name Theodore House. When you visit us or attend a CHC event we may share certain data with Theodore House to deliver certain services to you.

We are located on Stonyhurst College estate which maintains the surrounding grounds. If visiting Us, campus security may collect CCTV imagery of you and your vehicle for your own safety and that of the College. [Click here to view their privacy policy.](#)

### 2. What is personal data?

Personal data is information about you that can help Us identify you, such as your name, address, phone number or email address, or more discrete data such as the device ID of any smartphones, tablets or similar mobile devices you own.

There are also special categories of personal data that are treated by law as being particularly sensitive. This may include your racial or ethnic origin, your religious beliefs or information related to your health. We will only ever collect special categories of data where We have your explicit consent to do so, where it is in your vital interests that We do so, or to enable Us to make decisions regarding the services that We provide to you.

### 3. What data do we collect?

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The nature and the type of personal data we collect will depend on why you are giving it to Us:

- Your name, email, phone number, address and dietary requirements when you register for a CHC event.
- Your name and email when you sign-up to receive Our newsletter.
- Your IP address, when you consent to allow Cookies on Our website.
- Imagery of you may be captured at CHC events.
- Your name and contact details when you make a donation of any sort to the charity.

If any of your personal data changes, or you believe that any of the personal data that We hold is incorrect, please let Us know by contacting Us at [events@christianheritagecentre.com](mailto:events@christianheritagecentre.com) and We will ensure that Your Personal Data is up to date. We may also contact You from time to time to verify that Your Personal Data is up to date.

#### **4. What do We use your personal data for?**

When processing your personal data, We will only do so in relation to specific purposes and only after giving careful consideration to ensure that your privacy rights are not seriously impacted.

#### **Legal obligation**

We will process the personal data that you provide to us in the following ways in order to comply with Our legal obligations:

- To retain and process records when you make a donation to Us for Gift Aid transactions
- For the purposes of identifying and preventing fraud
- To comply with statutory or regulatory requirements

#### **Contractual**

We will also process your personal data as part of our contractual obligation to deliver you a service, including:

- When you register for a CHC event
- When you apply for the Christian Leadership Formation (CLF) programme. Note: because CLF applicants are under-18, we take extra care in processing their data in line with recommendations from the Information Commissioners Office

#### **Consent**

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We sometimes will process your personal data when you give us a consent for a specific purpose:

- When you have asked to receive Our newsletter
- When you have asked to receive other forms of marketing communication about Us

Where We are relying on consent to process your personal data, We will only process your personal data for the purpose that you have given Us consent for. If you would like to receive these communications but have not opted-in please contact Us at [events@christianheritagecentre.com](mailto:events@christianheritagecentre.com) indicating your preferred channel to receive marketing communications from Us.

### **Legitimate interest**

We sometimes collect data as part of a legitimate interest. This is often to help raise awareness of our work and communicate with stakeholders. This may include photography of CHC events or details of donations made.

## **5. Who do We share your personal data with?**

Except where We use third party services to collect information, when you are asked for personal data by Us, you are sharing that information with Us alone, unless We specifically state otherwise below:

- A. with our trading company, Theodore House. We share personal data, such as names, We share personal to meet requirements in respect towards hospitality requirements. We will also share any dietary requirements with Theodore House;
- B. third parties who we engage with to provide services to you on our behalf, such as processing bookings via our website. This may include, for example our accountants who will have access to personal data relating to donations and contractual agreements;
- C. third party individuals and organisations who we engage for the delivery of an event that you have registered for;
- D. any statutory, governmental or regulatory body that requests the personal data and that We are obliged (by law or by regulation) to provide;
- E. our analytics and search engine providers that assist Us in the improvement and optimisation of Our website. We currently use Google Analytics. Read their privacy policy online.

Please be aware that advertisers or web sites that have links on Our site may collect personally identifiable information about you. This privacy statement does not cover the information practices of those web sites.

As Our requirements change, We may need to change the third parties that process your personal data to meet those requirements. We do not sell or rent your personal data to

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anyone, We will never provide your personal data to another company or charity for their marketing purposes without your explicit consent.

## **6. How do We protect your personal data?**

We will always do Our best to keep your personal data secure. Steps We take in order to do this include the use of technical controls (such as encryption and network protection), limiting the number of people working for Us who have access to your data and ensuring that they are trained in protecting your personal data.

Where We use external suppliers to process your personal data, We put contracts in place to make sure that they treat it as carefully as We would and use it only in accordance with the instructions that We give to them. Where these suppliers operate outside of the European Economic Area (EEA), We will make sure that the levels of protection provided are at least equal to those required by UK law.

## **7. Retention of your personal data**

We will only retain your personal data for as long as We need to keep it. In considering how long to retain your data we will always take into account factors such as any ongoing obligations We have to You, the nature of Our relationship with You, legal requirements (e.g. in relation to HMRC statutory retention periods) and contractual requirements. We will not keep Your data indefinitely and will always dispose of it carefully when it is no longer necessary for Us to retain it, in line with defined schedules in Our Data Retention Policy.

## **8. Your Rights – What are the choices available to you regarding collection, use and distribution of your personal data?**

The law gives you a number of rights in relation to your personal data and Our use of it. You have the right:

- A. to ask Us not to use your personal data for direct marketing purposes;
- B. to ask to see what personal data We hold about You and to find out about the way that We process the data (and in some circumstances, You can ask Us to provide a copy to a third party);
- C. to ask Us to correct or update any personal data which is inaccurate;
- D. to ask for personal data to be deleted in some (but not all) circumstances where there is no good reason for Us to continue to process it;
- E. to ask Us to temporarily stop using your data if You don't believe that We have a right to use it, or to stop Us from using your personal data where there is no good reason for Us to continue to use it; and
- F. not to be subject to decisions made solely on the basis of 'automated processing' (i.e. the right not to be subject to decisions made solely by algorithms or computers)

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without input from a human) in certain circumstances.

If You would like to exercise any of the rights listed above, or if You have any queries or concerns about the way We use Your personal data (or any questions about this privacy policy), You can contact us at the details given to us bellow.

### **Your Right to Lodge a Complaint**

If you are unhappy with the way We have dealt with your personal data or if you have any further questions about how We process and retain personal data please contact Us at the details given at the end of this document. If you are still not satisfied, you have the right to lodge a complaint with the Information Commissioner's Office. Further information on how to do this is available on the ICO website.

### **9. Changing this policy**

We may make changes to this policy from time to time. If We make any significant changes to this policy that impacts the way in which your personal data is treated, We will post the changes on this page or, where We feel that the changes are really significant, We may contact you directly. Changes will apply from the time We post them (either here on Our website or when We contact you). This policy was last changed on March 2023.

### **10. How can you access, update or delete your personal data?**

By contacting us by email at [events@christianheritagecentre.co.uk](mailto:events@christianheritagecentre.co.uk), or by post to The Christian Heritage Centre, Stonyhurst College, Clitheroe, Lancashire, BB7 9PZ, England.

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