



# **WTC PRIVACY POLICY**

**FEBRUARY 2023**

<b>WTC Privacy Policy</b>	
Purpose	To explain how WTC collects data, how information is used and stored and what this means for the people whose information is being collected, used and stored.
Enquiries	Enquiries about the Privacy Policy should be directed to the Director of IT or the Chief Operating Officer at <a href="mailto:itdirector@wtctheology.org.uk">itdirector@wtctheology.org.uk</a> / <a href="mailto:operations@wtctheology.org.uk">operations@wtctheology.org.uk</a> respectively.
UKPRN	10030973
Legal Address	Suite 5, Winchcombe House, 37-39 Winchcombe Street, Cheltenham, GL52 2NA
Author	Chief Operating Officer and Director of IT
Approved by	WTC Board of Trustees
Next Review	October 2023
Staff member responsible for update	COO, Director of IT

## 1. INTRODUCTION

WTC values everyone who engages with the college by whatever means. We are committed to protecting and respecting your data privacy and do all we can to make sure any personal data you share with us is kept safe and only used in line with the reasons for which you engaged with WTC and your wishes.

This policy explains how we collect data, how we use and store information and what it means for you.

We aim to treat anyone who engages with us in accordance with our values and with the principles below. We welcome feedback on any of our actions. Call us on 0300 040 6200 or email [info@wtctheology.org.uk](mailto:info@wtctheology.org.uk) with any comments and concerns.

## 2. WHO WE ARE

WTC is a charity registered in England and Wales, number 1123573. We are also a company limited by guarantee, number 6506007. Our registered office address is:

Suite 5 Winchcombe House  
5-39 Winchcombe St  
Cheltenham  
Gloucestershire  
GL52 2NA

For the purposes of this Policy, 'us', 'we' and 'our' refer to WTC.

## 3. WHAT INFORMATION DO WE COLLECT?

### 3.1. From student applications

If you apply to become a student with WTC, you will supply us with quite a lot of information about yourself. This will include sensitive information such as physical or mental health conditions, or unspent criminal convictions.

### 3.2. Directly with us

Each time you deal with us we collect your personal information. For example, when you email us, sign up for an event, request information, donate or complete a survey, we collect the information you provide.

### 3.3. Indirectly from third parties

We collect information from third parties such as event organisers (e.g. EventBrite) or fundraising sites like Stewardship. You may wish to check the privacy policies of such organisations when you give them details about yourself.

### 3.4. From public website interaction with us

WTC collects non-personal data such as IP addresses, details of pages visited and files downloaded. Website usage information is collected using cookies, (see Section 8 below).

### 3.5. From publically available data

We may collect information about you from Companies House, the Charity Commission, and information published in articles or on websites.

### 3.6. Sensitive data

Where you provide the information, we may collect sensitive personal data, including, but not limited to, your religious beliefs, or your physical or mental health.

## 4. PRINCIPLES

### 4.1. Data processing

We will only process your data for purposes that are legal and fair. All processing undertaken will be necessary to achieve the purpose for which it was collected. We will make you fully aware of the extent of WTC's processing of personal information at the point of collection in a transparent way. We will also inform you of the possible third-party recipients of your information. We will provide you with the safeguards and controls applied to the processing and retention of your data.

### 4.2. Use of data

Your data will only be processed for the specific and legitimate purpose for which it was collected. In the unlikely circumstances that WTC wishes to use it for a different purpose, we will obtain your consent and give you a full explanation of the reason.

### 4.3. Data anonymity

Where possible, we will use anonymous data. If your data is inaccurate, it will be corrected, either by you (e.g. students through MyWTC) or by us as soon as possible.

### 4.4. Data storage and retention

WTC has a Data Retention Policy which states the lengths of time for which different types of data is held. These retention periods are in line with legal requirements. We will not store your data for longer than is needed for the legitimate activity for which it is held.

#### 4.5. Data Protection

WTC will take all steps to ensure your data is protected against unauthorised use and accidental loss, destruction or damage. We keep your data confidential in a permissions driven data management system.

### 5. BASIS OF PROCESSING YOUR DATA

WTC processes all data in line with the regulations contained within the General Data Protection Regulation (GDPR) which came into force on 25 May 2018.

#### 5.1. Consent as a student

When you apply to become a WTC student, you provide information to us on the basis that it is used to maintain contact with you and provide support throughout the duration of your studies.

#### 5.2. Consent to use WTC Resource

When you register to access one of our free courses on WTC Resource, you provide your information to us in order that we can give you access to our online learning platform. We also collect additional information that helps us to understand who is interested in these resources and for market analysis.

#### 5.3. Consent as a supporter

Under GDPR regulations, if you are providing personal information as a new supporter (including new alumni and donors) we process your data on the basis of the consent you provide us with. You are free to change your preferences at any time by contacting us by telephone, post or email. (See Section 10 below for details).

We have continued to contact existing supporters who had already provided their information in May 2018 (when GDPR regulations came into effect) in line with the consent we hold for you.

#### 5.4. Legitimate interest

We may contact you by post or telephone where we have a legitimate interest to do so. For example, where you are or have previously been a student with WTC, or have made a donation to us, we may continue to send you information about the work your donation is making possible, or events that we are running which you may be interested in. Where you have previously asked us not to contact you in this way we will continue to respect your contact preferences.

You can change your preferences at any time or object to us processing your data by contacting us by telephone, post or email as shown in Section 10 below.

## 6. WHAT WE DO WITH YOUR DATA

### 6.1. Processing requests / donations / calls to action

We may use the personal data we collect to:

- ❖ Respond to questions that you have asked us
- ❖ Keep you up to date with events that we are planning
- ❖ Provide information on new programmes and courses that we are offering or other resources which you may find interesting
- ❖ Provide prospectuses or flyers for events
- ❖ Keep records of your relationship with us e.g. questions you have asked or details about conversations we have had about your studies / potential studies
- ❖ Ask for financial and non-financial support, such as volunteering or prayer
- ❖ Process donations you give us, or to support your fundraising for us, including Gift Aid
- ❖ Analyse the personal information we collect about you to aid our understanding of our students and potential students
- ❖ Conduct market research to aid our understanding of our partners and supporters.

### 6.2. Processing of Student Personal Data

If you become a WTC student, you will have provided a lot of personal information on your application form. Below are some examples of why we need this information:

- ❖ To assess your suitability to study
- ❖ To enable us to tailor necessary support to ensure you succeed in your studies
- ❖ As the basis for how we communicate with you during your studies
- ❖ To register you with our validating university (for degree level programmes)
- ❖ To comply with Higher Education Institution requirements for submission of generic and anonymised statistics relating to our students
- ❖ If you have a conviction which is unspent, then we will also use your data to conduct a risk assessment before you begin your studies with us.

### 6.3. Processing of Student General Bursary Applications

If you apply for a WTC General bursary we collect information from you relating to your household income and other pertinent facts relating to the criteria for bursary assessments. This application is only accessible to a few WTC employees on a 'need to know' basis, and the information supplied is only used in assessing eligibility for a bursary.

### 6.4. Processing of Principal's Bursary Fund Applications

If you apply for a Principal's Bursary you will have provided us with details of past convictions and addictions in order that we can assess whether you meet the

criteria to be awarded this bursary type. You will also have given us your permission to contact your church leader or mentor to discuss your suitability for study. Information in this application will only be made available to a few WTC staff members on a 'need to know' basis.

#### 6.5. Attendance at a WTC non-student event

If you attend a theology event with WTC, we collect additional information that helps us to understand who is interested in our events and for market analysis.

#### 6.6. Applying for a job, sub-contracting or volunteering with us

Where you provide personal data and sensitive personal data when applying for a job with us, such as the information on your CV, we will process, store, and disclose the personal data we collect to:

- ❖ Support the recruitment process
- ❖ Enable you to submit your CV, and apply online for jobs as relevant
- ❖ Answer any questions you may have
- ❖ Use third parties to provide services such as references, qualifications, criminal referencing, checking services, verification of information you have provided, health screening and psychometric evaluation or skills tests
- ❖ Provide anonymised data to monitor compliance with our equal opportunities legislation
- ❖ If you have applied for a Hub Director position, or associated post, where your appointment is contracted to the Hub Church(es), your application details will be shared with the church(es) in question.

### 7. HOW AND WHERE WE STORE YOUR INFORMATION

#### 7.1. How long?

We will keep your personal information in accordance with any legal or regulatory requirements.

We will retain details of donations and all financial transactions for seven years to meet tax and accounting requirements.

We will retain details of job applicants for six months following an interview.

Legacy income is an important source of income for WTC. We may keep the data indefinitely of those leaving us legacies in order to administer them and to communicate with the families of those who have left us a gift.

#### 7.2. Data security

WTC ensures that we have appropriate technical controls in place to protect any personal data you provide.

We ensure that access to personal data is restricted only to those staff members or volunteers whose job roles require such access, and that suitable training is provided for these staff members and volunteers.

However, we need to remind you that despite all our efforts, the internet cannot be guaranteed to be 100% secure, and that you submit data at your own risk.

## 8. COOKIES

### 8.1. What are cookies?

The use of cookies is an industry standard for most major websites. A cookie is a text file that is sent from our website as soon as you visit our site. It is stored on your computer's hard drive and helps us to identify your computer (not you) and collects information in an aggregate, anonymous way.

Cookies may be used to collect information about your visit to our website; for example, traffic data, location data, device information, the date and time of your visit and the pages that you visit.

To enjoy the WTC websites to the full, we recommend that you leave cookies turned on. If you turn off cookies then you may not be able to enter parts of the site.

Cookie data we collect may be used to:

- ❖ Customise the content on our website and to help to understand visitor's current and future needs
- ❖ Process any requests, applications or transactions you may make aid internal administration and analysis.

### 8.2. Managing cookies

Most browsers allow you to turn off the cookie function. To do this you can look at the help function on your browser.

### 8.3. Third party cookies

WTC works with a number of third-party suppliers who set cookies on our websites to enable them to provide us with services. These are mainly used for reporting and advertising purposes so we can improve the way we communicate.

We use websites such as Youtube and Vimeo to embed videos, and you may be sent cookies from these websites. We do not control the setting of these cookies, so we suggest you check the third party website for more information about their cookies and how to manage them.

WTC also uses third party suppliers such as Facebook and Google Analytics. These providers may use cookies and tracking pixels, which are commonly found in advertising to track the effectiveness of adverts.



As some of these services may be based outside the UK, they may not fall under the jurisdiction of UK courts. If you are concerned about this you can change your cookie settings.

## 9. WHEN WE SHARE YOUR INFORMATION

We do not share or exchange your information with any other charities or marketing organisations.

### 9.1. Validating University

If you are a student on one of our validated programmes, we share some of your personal data with our validating university in line with their validation procedures.

### 9.2. Legal Duty

We may need to pass on information if required by law or by a regulatory body. For example, a Gift Aid audit by the HMRC, or if asked for details by a law enforcement agency.

## 10. YOUR CHOICES AND TELLING US WHEN THINGS CHANGE

### 10.1. Preferences

You can change your preferences on what you receive from us, including marketing and fundraising materials, at any time. You can do this by:

- ❖ Clicking on the relevant link at the bottom of emails you receive from us
- ❖ Calling us on 0300 040 6200
- ❖ Emailing us at [info@wtctheology.org.uk](mailto:info@wtctheology.org.uk).

### 10.2. Updating your details

Please let us know if your details change so that we can keep them up to date. You can do this by emailing us at: [info@wtctheology.org.uk](mailto:info@wtctheology.org.uk), or current students can update their own details on MyWTC.

### 10.3. Telling us to stop processing and storing your data

You have the right to ask us to erase your personal data, to ask us to restrict our processing, or object to our processing of your personal data. You can do so at any time by emailing us at [info@wtctheology.org.uk](mailto:info@wtctheology.org.uk) or by writing to us at:

WTC  
Suite 5 Winchcombe House  
5-39 Winchcombe St  
Cheltenham  
Gloucestershire  
GL52 2NA

## **11. ACCESS TO YOUR INFORMATION**

You have the right to request details of the information we hold about you. This includes the right to be provided with a copy and a description of the data in a clearly understandable format. To receive a copy of the personal information we hold please write to our Data Protection Lead ([operations@wtctheology.org.uk](mailto:operations@wtctheology.org.uk)), and we will respond to you within 30 days of receipt of your letter.

You have the right to request that WTC stop processing personal data where your interests override those of WTC. This does not apply if WTC is required by law to process your data.

If, after speaking with WTC about your personal data and how it is being processed and used, you still have concerns, you have the right to complain to the Information Commissioner's Office. Their website address is [www.ico.org.uk](http://www.ico.org.uk).

## **12. CHANGES TO WTC'S PRIVACY POLICY**

We may amend this policy from time to time to take account of changes to our processes or changes to data protection or other legislation. If we make any significant changes to this policy we will show this clearly on our website or by writing to you directly. By continuing to use our website or our services, you will be deemed to have accepted these changes.