

# **PRIVACY POLICY FOR RESIDENTS OF THE EUROPEAN UNION**

## **INTRODUCTION**

The Presbyterian Church (USA) respects your privacy and is committed to protecting your personal data. This privacy notice informs you as to how we look after your personal data and tells you about your privacy rights and how the law protects you.

## **CONTROLLER**

The Presbyterian Church (USA), A Corporation, 100 Witherspoon Street, Louisville, Kentucky 40202, USA is the controller responsible for your personal data (referred to as the “A Corporation”, “we”, “us” or “our” in this privacy notice).

## **PERSONAL DATA SUPERVISOR**

We have appointed a personal data supervisor who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the personal data supervisor using the following details.

Name: Michael Kirk

Postal address: 100 Witherspoon Street, Room 5625, Louisville, Kentucky 40202

Email address: [mike.kirk@pcusa.org](mailto:mike.kirk@pcusa.org)

## **QUESTIONS / CONCERNS**

If you are a data subject in the European Union, you also have the right to make a complaint at any time to a supervisory authority. The A Corporation designates the UK supervisory authority, the Information Commissioner’s Office (ICO), for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)).

## **THE DATA WE COLLECT ABOUT YOU**

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

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

- **Identity Data:** This includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.

- **Contact Data:** This includes address, email address and telephone numbers.
- **Financial Data:** This includes bank details.
- **Religious Data:** This includes your religion.
- **Technical Data:** This includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Usage Data:** This includes information about how you use our website.

We do not collect any other **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

**HOW IS YOUR PERSONAL DATA COLLECTED?**

We use different methods to collect data from and about you, including through:

- **Direct interactions.** You may give us your Identity, Contact, Financial and Religious Data by filling in forms or by corresponding with us by post, phone, email or otherwise.
- **Automated technologies or interactions.** As you interact with our website or app, we will automatically collect Technical and Usage Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy for further details.

**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 use your personal data, which of the legal bases we rely on to do so and the retention period for such personal data. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

	<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate</b>	<b>Retention period</b>
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			<b>interest</b>	
1	To communicate with you regarding the work of our church.	(a) Identity data. (b) Contact data. (c) Religious data	(a) Necessary for our legitimate interests (for running our church)  (b) Processing carried out in the course of our legitimate activities as an association with a religious aim	5 years after you cease to work with our church.
2	To receive donations from you.	(a) Identity data. (b) Contact data. (c) Religious data (d) Financial data	(a) Necessary for our legitimate interests (for running our church)  (b) Processing carried out in the course of our legitimate activities as an association with a religious aim	3 years after we received your donation.
3	To understand how you use our website.	(a) Technical Data (b) Usage Data	Necessary for our legitimate interests (to keep our website updated and relevant)	1 year after we received your information.
4	To notify you about changes to our privacy notice	(a) Identity Data (b) Contact Data	Necessary to comply with a legal obligation	For as long as we retain personal data about you for other purposes/activities.

**CHANGE OF PURPOSE**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **COOKIES**

A cookie is a small piece of information that is sent to your browser and stored on your device's hard drive. Cookies do not damage your computer.

We use cookies to track how many visitors access our websites, the date and time of their visit, the length of their stay, and which pages they view. We also use cookies to determine which web browsers our visitors use and the address from which they accessed the site.

We do this by using temporary "cookies" that collect the first level domain name of the user. For example, if your email address is "name@xyz.com," the cookie collects the "xyz.com" portion of your email address and the date and time you accessed our websites. This cookies expires when your browser window is closed.

We use this data and may share anonymised versions of it with third parties for various reasons; for example, to improve the content and functionality of our websites, to better understand the needs and interests of our visitors, to improve our programs and services.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you block or delete all cookies from our website, it (or certain parts of it) may not work.

## **ONLINE ADVERTISING THROUGH REMARKETING**

At times, we use Google Remarketing to advertise Presbyterian Mission or PCUSA across the Internet. The Google Remarketing platform will display relevant ads tailored to you based on what parts of [presbyterianmission.org](http://presbyterianmission.org) you have viewed by placing a cookie on your machine. This cookie does not in any way identify you or give access to your computer. The cookie is used to say "this person visited this page, so show them ads relating to that page." Google Remarketing allows us to tailor our marketing to better suit your needs and only display ads that are relevant to you.

If you do not wish to participate in our remarketing, you can opt out by visiting Google's Ads Preferences Manager

You can also opt out of any third-party vendor's use of cookies by visiting [www.networkadvertising.org/choices/](http://www.networkadvertising.org/choices/)

## **FAILURE TO PROVIDE PERSONAL DATA**

Where we need to collect personal data by law and you do not provide personal data when requested, we may not be able to continue the contract we have with you. In this case, we may have to cease to provide you with certain services.

## **MAINTAINING PERSONAL DATA**

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.

## **DATA RETENTION**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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.

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

## **DISCLOSURES OF YOUR PERSONAL DATA**

We may share your personal data with the following external third parties.

<b>External third parties</b>	
Our information technology providers.	To provide the website and app.

Our auditors and legal advisors.	To receive financial, tax and legal advice.
Inland revenue service.	Financial and tax reporting.
Third party pursuant to a court order or other legal process.	To comply with our legal obligations.

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.

## **INTERNATIONAL TRANSFERS**

The Presbyterian Church is located in the United States of America. Where we collect personal data from data subjects in the European Economic Area, we rely on your consent to transfer your personal data to the United States of America.

## **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. Please note that we have no control over the use of your personal data disclosed where required by law to public registers and as part of legal proceedings.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **YOUR LEGAL RIGHTS**

For EU residents only, you have the following rights under data protection laws in relation to your personal data:

- **Request access** to your personal data (commonly known as a “data 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. 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) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in 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.
  - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal 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.

If you wish to exercise any of the rights set out above, the personal data supervisor.

**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.