

YWAM Cymru/Wales Privacy Notice

Last modified: February 2020

At Youth With a Mission Cymru/Wales doing business as YWAM Wales or YWAM Wrexham (hereinafter, "we" or "us" or "our" or the "Organisation"), we sincerely care about privacy, security, and transparency; these fundamental elements of privacy and security play an important part in our organisation's mission. Toward that, this Privacy Notice explains how we safeguard your personal information when you surf our website; it also clarifies your privacy privileges and how the law protects you. This Privacy Notice also applies to personal data you entrust to us when applying to our training centre, when enrolling in training development, or when contact us for more information.

How We Collect Information

One of the purposes of this Privacy Notice is to explain how we collect and process personal data at <https://www.ywamwales>, including any data provided through the website or the application forms. The information may be provided through contact forms, payment forms or when you apply for an opportunity at our location.

Please be informed that this website is not intended for children, defined as age 15 and under; we absolutely do not knowingly collect data from children. We do occasionally collect data ABOUT children who are joining their families or running programmes for children.

We encourage you to read this Privacy Notice; it has been written to ensure you understand how we collect information, how it is safeguarded, what is collected, how it is processed, where it is processed, with whom we may share it, and your rights under the law.

Understanding Who Controls Your Data

This Privacy Notice applies when we are acting as the Data Controller with respect to the personal data we process about you. In other words, where we determine the purpose and the means of the processing, we are identified as the Data Controller and we are responsible for controlling and safeguarding your personal data.

Toward that, we have assigned a data privacy manager to superintend all aspects of this Privacy Notice, ensuring your questions are answered and your rights are respected. Whenever you have questions, you should contact the data privacy manager via one of the venues below:

Data Privacy Manager, Sarah Opper, Team Leader

25 Hightown Road

Wrexham

LL13 8EB

info@ywamwales.org

+44(0)1978261712

YCW is a registered charity 1164721. Registered at 25 Hightown Road, Wrexham, LL13 8EB.

How We Collect Your Data

We may collect your data through direct interaction, automation, or third parties. Here's more information about these methodologies:

- Direct interactions. We may receive your information directly when you:
 - e-mail us;
 - request marketing information to be sent to you;
 - enquire about enrollment;
 - submit an application;
 - interview with us; or
 - provide us feedback.
- Automated technologies or interactions. When you use our website or log in to our services, we may learn technical data about your computing system and browsing activity. This data is gathered by employing cookies and related tools.
- Third parties. Your personal data may be received via a third party as follows:
 - Via analytics through providers such as Google Analytics, which is located outside of the EU; and
 - From service providers, we use, including companies such as:
 - GSuite to process applications (though applications are printed and then deleted and stored only on paper in the long-term);
 - Paypal, Quickbooks to process invoices and payments;
 - MailChimp, Facebook, GSuite to communicate with you; and
 - Social Media platforms such as Facebook, Instagram, Twitter and YouTube for collaboration and advertising purposes.

To learn more about the cookies we utilise on this site please refer to our cookie notice.

How We Process Your Data

Our Organisation will only process your data according to the allowance permitted by law. In most instances, we will only use your data in the following situations:

- when you provide us with your consent to process your personal data, which may be revoked by you at any time and for any reason;
- when it may be necessary for our legitimate interest;
- when we may need to respond to a legal requirement or regulatory action; and
- where we need to fulfill our obligation to provide training when you enroll into one of our training programmes.

If you have any further questions about how we process your data, or if you want to revoke your consent, please contact us at.

Information that We Collect About You and the Lawful Basis for Processing

We may collect information about you as shown below, that makes you identifiable. We may also process, store, transfer or modify data that has been grouped together.

In the following table, we describe ways your personal information may be used; each of these uses are tied to a legal basis for processing. Further, we have also outlined wherever we have a legitimate interest to process your data where appropriate.

Processing Activity	Personal Data	Lawful Basis
Requests for information: <ul style="list-style-type: none"> e-mails to us; requests for marketing information; enquiries about enrolment; responding to feedback provided to us. 	Identity Data <ul style="list-style-type: none"> Name Contact Data <ul style="list-style-type: none"> Email Address Phone Number Country Communication Data <ul style="list-style-type: none"> marketing preferences 	Article 6 (a) Consent: the individual has given clear consent to process their personal data for a specific purpose.
Completing and submitting an application for enrolment, including the decision-making process	Identity Data: <ul style="list-style-type: none"> Given names Date of birth Gender Nationality (but not race or ethnicity) Passport number Visa number National number (NHS, etc.) Citizenship Contact Data: <ul style="list-style-type: none"> Phone number Social media handle Email Mailing address Language preference Permanent address Temporary address IP address, MAC address Enrolment Data <ul style="list-style-type: none"> Education and Vocational experience 	Article 6 (b) Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.

- Character references

Special Categories of Data:

- Religious beliefs
- Healthcare information
- Mental information
- Sexual orientation
- Sex life
- Passport photo as biometric identifier
- Children's data
- Financial, banking and credit details
- Criminal record data

Relationship management including:

- Asking you for feedback.
- Notifying you about changes to our terms and conditions,
- Notifying you about changes to our Privacy Notice.
- Sending you communication through our newsletter.
- Asking you to update your contact information.
- Communicating with you about our services.

Identity Data

- Name

Contact Data

- Email Address
- Phone Number
- Country

Communication Data

- Marketing preferences

Article 6

(b) Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.

(c) Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).

(f) Legitimate interests: the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

Payment processing

- Donations
- Invoices and payments

Identity Data

- Name

Contact Data

- Email Address
- Billing Address
- Phone Number
- Tax Deductible Location

Donations are processed based on article 6 (a) Consent: the individual has given clear consent to process their personal data for a specific purpose.

Invoices and payments are processed based on Article 6 (b) Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.

It is also possible that we may process your personal information via more than one lawful basis depending upon the purpose for which we are using it. If you have questions about the lawful basis by which we are processing your data, please contact us at info@ywamwales.org.

Sometimes we aggregate data such as statistical metrics or demographic information stemming from your personal data. It should be noted that statistical and demographic data is not personal data when it does not directly or indirectly reveal your identity. Only when statistical data is combined with personal data will this Privacy Notice apply.

In some instances, such as to apply to one of our training offerings and complete an application, we may receive sensitive data about you, which may be defined differently in various countries. Using Article 9 of the GDPR as a baseline, this data, if provided, may be associated with your religious or philosophical beliefs, or could include information about your health. If you provide us this information, you do so by choice and under no compulsion whatsoever. We commit to safeguard your data and provide it adequate protections, and will only use it according to the purposes set forth in this Privacy Notice and according to legal limitations.

Explanation of Lawful Basis

Many laws around the world require a controller to show it has properly considered which lawful basis applies to each processing purpose. It also requires controllers to justify the decision. Toward that, and using EU GDPR definitions below, the following lawful basis applies to processing activities noted in the table above.

- Consent means we have received your consent to process your personal data for the purpose specified.
- Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights 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. You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us at info@ywamwales.org.
- Performance of Contract means processing your data where it is necessary for the performance of an agreement to which you are a party or to take steps at your request before entering into such an agreement.
- Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Third-party Links

This website may include links to third-party websites. 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 notice or other relevant information of every website you visit.

Communication & Marketing

We will make every effort to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us, purchased services from us or if you provided us with your details when you subscribed to our newsletter and, in each case, you have not opted out of receiving that marketing.

Opting Out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time. Where you opt-out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase, service experience or other transaction.

When We Might Change How We Use Your Data

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 or disclose your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Transferring Your Data

Many of our external third parties are based outside the European Economic Area (EEA). In those cases, processing of your personal data will involve a transfer of data outside the EEA. A list of the external third parties are shown below.

Name of Subprocessors	Registered Business Address	Location of Processing	Link to Privacy / Security Policy
UofN Records System	Chemin du Praz d'Eau 1 1000 Lausanne 25 Switzerland	Frankfurt, Germany	https://uofn.edu/privacy-notice
G-Suite	Googleplex, Mountain View, California	United States	https://policies.google.com/privacy

Google Analytics	Googleplex, Mountain View, California	United States	https://policies.google.com/privacy
MailChimp	Ponce City Market, Atlanta, Georgia	United States	https://mailchimp.com/legal/privacy/
Paypal	S.à.r.l. et Cie, S.C.A., 22-24 Boulevard Royal L-2449, Luxembourg	Luxembourg	https://www.paypal.com/uk/webapps/mpp/ua/privacy-full
Facebook Inc.	Menlo Park, California, United States	United States	https://www.facebook.com/privacy/explanation
Microsoft O365		Europe & United Kingdom	https://privacy.microsoft.com/en-gb/privacystatement
Website on TSO Host	Maidenhead, Milton Keynes and Slough	United Kingdom	https://help.tsohost.com/knowledge-base/article/4640
Quickbooks Intuit	2700 Coast Avenue Mountainview, CA 94043	United States	https://quickbooks.intuit.com/eu/privacy-policy/
UKVI Sponsorship Management System	DPO Office Cabinet Office 70 Whitehall London SW1A 2AS	EEA	https://www.gov.uk/help/privacy-notice
YouTube	Googleplex, Mountain View, California	United States	https://policies.google.com/privacy
Instagram	Menlo Park, California, United States	United States	https://www.facebook.com/privacy/explanation
CAF Bank	25 Kings Hill Avenue, West Malling, Kent ME19 4TA	United Kingdom	https://www.cafonline.org/privacy
Internal Visa Processing	Sarah Oppen 25 Hightown Road Wrexham LL13 8EB	UK	https://www.ywamwales.org/contact/

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by employing at least one (or more) of the following safeguards:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).

- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

Your Security

We have put into 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 staff, 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.

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.

How Long We Will Use Your Data

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 requirements.

By law we have to keep basic information about our missionaries, volunteers and trainees

- Applications, Contact, Identity, Transaction Data for two years after they cease being missionaries, volunteers and trainees for tax purposes.
- Unsuccessful applications, Contact, Identity, Transaction Data for Six months after they cease being missionaries, volunteers and trainees for tax purposes.
- Information related to safeguarding will be kept for up to 75 years.
- Information regarding financials will be kept for 7 years
- Some information related to your involvement in our charity may be kept indefinitely in order to maintain integrity of our data.

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

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Your Rights

Under certain circumstances, you have 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 “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: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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 (d) 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, please contact us at info@ywamwales.org. 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 may 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. We try to respond to all legitimate requests within one month. Occasionally it may 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.

Where to Make a Complaint

If you have a complaint regarding any aspect of how your personal data is handled by us, or with this privacy policy, then please write to us on info@ywamwales.org and we will work hard to listen to you respecting your complaint. We will take every step to try to ensure the matter is resolved to your expectations.

In the unlikely even that you are still not satisfied with the outcome of your complaint, you may write to the Information Commissioner's Office at the following address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow, Cheshire
SK9 5AF

You can also contact the Information Commissioner's Office using their online form: <https://ico.org.uk/global/contact-us/email>

Changes to this Statement

We will occasionally update this Privacy Notice to reflect company and customer feedback. We encourage you to periodically review this statement to be informed of how we are protecting your information.

Contact Information

YWAM Cymru/Wales welcomes your comments regarding this Privacy Notice. If you believe that we have not adhered to this notice, please contact us at info@ywamwales.org. We will use reasonable efforts to promptly determine and remedy the problem. Our Data Privacy Manager can be contacted on +44 (0)1978 261712.