



Wesley House data protection statement and privacy notice (holiness subscribers)

This statement explains how Wesley House handles and uses personal data we collect about subscribers to the HOLINESS journal. Where in this statement we refer to 'we' or 'our' or 'us' we are referring to Wesley House, Cambridge and where we refer to 'you' or 'your' we are referring to our residents. We are registered with the Information Commissioner's Office (ICO) with registration number Z663811z.

We are committed to protecting your personal information and to being transparent about what information we hold. Wesley House understands its obligations to you to help you understand how and why we process your personal data. This notice tells you about these uses and should be read in conjunction with the Wesley House data protection policy.

Our data protection policy and procedures are governed by the Data Protection Act 1998 and, from 25th May 2018, the EU General Data Protection Regulation. The law in this area is changing rapidly and we anticipate this statement may be revised in line with guidance from the Information Commissioner's office.

Why we hold your personal data

Holding your personal data enables us to send you information about the HOLINESS journal

Lawful basis for processing personal data

The lawful basis for processing the personal data of alumni and supporters as described in this document is **consent**.

Wesley House may also store some of your personal data in accordance with other privacy notices (eg if you are a Wesley House student or have given consent for marketing).

Personal data held by Wesley House

The information we hold is that which you provide to us (for example, you may give us information by filling in forms on our website, or by corresponding with us by post, telephone, email or otherwise).

- Your name
- Your email address

We do not hold any sensitive personal data about you.

How your personal data is used by Wesley House

Your data is used by us for emailing you news and information about the HOLINESS journal and for responding to data access requests you make.

If you have concerns or queries about any of these purposes, or how we communicate with you, please contact us at the address given below. We will always respect a request by you to stop processing your personal data, and in addition your statutory rights are set out below.

Sharing your data with others

Within Wesley House, personal data, including sensitive personal data, may be shared between members of staff, including Trustees, who legitimately need the information to carry out their normal duties to support your time with us. We endeavour to ensure that sensitive personal data is only shared with colleagues with your explicit consent. However, circumstances may arise where this data is shared with colleagues without gaining your consent. This will only occur if it is necessary to protect your vital interests or the vital interests of another person; or for certain other reasons where it is not possible or appropriate to gain your consent such as disclosures to the police for prevention or detection of crime, or to meet statutory obligations relating to equality monitoring.

Data may be shared with reputable "data processors" for the purposes of sending communications (eg mailchimp).

Otherwise, Wesley House does not share data with any third party, except as allowed for in other privacy notices or required by law. We do not sell your personal data to third parties under any circumstances, or permit third parties to sell on the data we have shared with them.

Transfer of personal data to other countries

Your data will not be transferred to any other country.

How long data is kept

We will retain your data indefinitely until you ask to unsubscribe.

Where you exercise your right to erasure, we will continue to maintain a core set of personal data (in this case your name) to ensure we do not contact you inadvertently in future, and to maintain your record for archive purposes.

Your rights

You have the following rights

To be informed	This Privacy Notice provides the information you are entitled to receive
Access	<p>Please contact us if you would like confirmation that your data is being processed and access to your personal data.</p> <p>There is no charge for us providing you with this data and it will usually be provided within a month of the request (unless the request is unfounded or excessive).</p>
Rectification	<p>Please inform us of any data which you would like rectified and we will usually respond within a month of the request.</p> <p>We will pass on the changes to any third parties who need to change their records and let you know this has been done.</p>
Erasure	You may exercise your right to have your personal data erased in a number of circumstances (eg if the data is no longer necessary in relation to the purpose for which it was created or you withdraw your consent). Where possible we will comply with all such requests, though some details are part of the College's permanent records (eg examination results, college photographs) which can not reasonably be deleted.
Restrict processing	<p>You can tell us that we can keep your data but must stop processing it, including preventing future mailings and communications.</p> <p>If possible we will inform any third parties to whom your data has been disclosed of your requirement.</p>
Data portability	Your data is across manual records and a bespoke Access database. We will do our best to provide information in a portable format but it is unlikely that we can create systems to do so.
to object	<p>If we can, we will stop processing your data if you object to processing based on legitimate interests or the performance of a task in the public interest / exercise of official authority (including profiling).</p> <p>We will stop processing your data for direct marketing if you tell us to.</p> <p>We will stop processing your data if you object to processing for purposes of research and statistics.</p>
Not to be subject to automated decision-making including profiling	We do not use any automated decision-making.

You have the right to lodge a complaint with the Information Commissioner's Office at <https://ico.org.uk/concerns>.

Further information

The controller for your personal data and our Data Protection Officer is the Business Director of Wesley House who can be contacted via office@wesley.cam.ac.uk or Wesley House, Jesus Lane, Cambridge, CB5 8BJ.

Our Data Protection Officer is responsible for monitoring compliance with relevant legislation in relation to the protection of personal data. Please contact us at office@wesley.cam.ac.uk if you have any concerns or questions about the above information or you wish to ask us not to process your personal data for particular purposes or to erase your data. Where you have specific requests relating to how we manage your data, we will endeavour to resolve these, but please note that there may be circumstances where we cannot comply with specific requests.

We will publish on our website any changes we make to this data protection statement and notify you by other communication channels where appropriate.

October 2017