

# SUMT Privacy Notice



Scripture Union Ministries Trust (SUMT) is a data controller for the purposes of the Data Protection Act 2018 and General Data Protection Regulation (Isle of Man) Order 2018. The contact details for the SUMT are:

THE SCRIPTURE UNION MINISTRIES TRUST  
Clybane Cottage  
Phildraw Road  
BALLASALLA  
Isle of Man  
IM9 3DU

This privacy notice will explain how Scripture Union Ministries Trust (SUMT) uses the personal data we collect from you when you voluntarily supply it through forms that you complete or when you provide information to us online or visit our website.

## What data do we collect?

Personal information is information that can be used to identify you. We collect personal information about you when you ask about our activities make a donation, attend or book on an event, engage with our social media or message boards, order products and services (such as publications and email newsletters), apply for a job or to volunteer with us, tell us your story, use our website, provide us with feedback or make a complaint, participate in training, when your image is captured on CCTV, by photograph or video, or when you otherwise provide personal information.

The information we collect and hold may typically include:

- your name
- date of birth
- email address
- postal address (home or work)
- telephone number
- mobile telephone number

If you are applying for a young person to attend an activity, such as a residential we may need to be provided with:

- health, dietary and mobility requirements for health and safety purposes

If you make a payment relating to an order, donation, event booking or volunteer application, we may also collect:

- bank account details
- credit/debit card details
- other financial records and, for Gift Aid purposes, whether you are a UK taxpayer

If you interact with us online, we may also collect:

- your IP address
- details of pages visited

We do not collect sensitive or special category information about you unless there is a clear reason for doing so. We will make it clear to you when collecting this information as to what we are collecting and why.

If you apply to work with us in a paid capacity or as a volunteer, we may also collect:

- personal and sensitive personal data such as the information on your CV or as requested in the application form
- health, dietary and mobility requirements for health and safety purposes
- disclosure of criminal convictions

### **How do we collect your data?**

You directly provide SUMT with most of the data we collect. We collect data when you:

- Contact us through our website or social media platforms.
- Voluntarily complete a survey that we have produced or provide feedback on social media or via email.
- Use or view our website via your browser's cookies.

### **How will we use your data?**

SUMT collects your data so that we can:

- provide you with the services, products or information you have requested;
- to fulfil contractual obligations to you;
- for administration purposes, such as to contact you about a donation about activities you have expressed an interest in, registered for or volunteered on;
- to process any donations, orders, event bookings or team fees we may receive from you (including the processing of Gift Aid via HM Revenue & Customs if applicable to those not Isle of Man residents);
- for financial or legal obligations, such as ensuring your donation is used correctly, VAT purposes, contractual payments;
- Respond to any questions that you may ask;
- Keep in touch with you, and let you know what we are up to;
- for internal record keeping, such as the management of feedback or complaints and financial reporting;
- to analyse and improve the services we offer.

### **How do we store your data?**

SUMT securely stores your data in our database, and sometimes in paper copy in our office (if you give us your data on paper)

SUMT will keep your personal information unless you request that we delete it from our records - this can be done at anytime by clicking unsubscribe on one of our emails or by contacting us directly through the website or via email.

### **Protection of minors**

We caution all visitors to our website under the age of 16 not to disclose or provide any personally identifiable information through our service. In the event that we discover that a child under the age of 16 has provided us with personal information, we will delete the child's personal information from our files to the extent technically feasible.

### **Are cookies in use?**

If third parties process information via cookies, they collect the information directly through your browser. Cookies do not cause any damage to your device.

We inform you about the respective services for which we use cookies in the individual processing operations.

### **How is my data processed in detail?**

In the following, we inform you about the individual processing operations, the scope and purpose of the data processing, the legal basis, the obligation to provide your data and the

respective storage period. An automated decision in individual cases, including profiling, does not take place.

## **SUMT's website**

### **Nature and scope of the processing**

Our website services are provided by Heart Internet. Their privacy notice can be found at [Heart Internet Privacy Statement](#). They provide WordPress Hosting which allows us to build and manage a Wordpress site. Their privacy notice can be found here [Privacy Policy – Automatic](#).

Specifically, interactions with the features provided by Heart Internet, the content and links (including those of third-parties, such as social media plugins) contained within the Services, Internet Protocol (IP) address, browser type and settings, the date and time the Services were used, information about browser configuration and plugins, language preferences and cookie data, information about devices accessing the Services, including type of device, what operating system is used, device settings, application IDs, unique device identifiers and error data is collected.

Integration with other applications can occur in operating a WordPress site, and SUMT use this ability to provide Google Calendar to notify people of upcoming events, Google Forms to allow feedback on events that we have run and to book on activities, including residential.

### **Purpose and legal basis**

The operation of a website is carried out to protect our overriding legitimate interest in displaying our website and guaranteeing security and stability on the basis of Art. 6 para. Lit. f GDPR. Calling up our website is not technically possible without providing the data.

### **Retention period**

SUMT do not obtain or retain any of the information provided to Heart Internet or WordPress in the operation of the website.

## **SUMT Newsletter**

### **Nature and scope of the processing**

We send e-mails and other electronic notifications with promotional information (hereinafter "newsletter") only with your consent or legal permission. The newsletters contain information about what we have been doing, offers, promotions and about SUMT generally. By subscribing to our newsletter, you agree to receive it.

To send the newsletter, we use Mailchimp, a service of The Rocket Science Group LLC, USA, which processes your personal data on our behalf in accordance with Art. 28 GDPR. This is a service provider from a third country. We rely on standard contractual clauses with the service provider.

## **Purpose and legal basis**

We process your data for the purpose of sending newsletters on the basis of your consent pursuant to Art. 6 para. 1 lit. a GDPR. The use of a dispatch service provider, the performance of statistical surveys and analyses as well as the logging of the registration process are based on our legitimate interests pursuant to Art. 6 para. 1 lit. f GDPR. Our interest is directed towards the use of a user-friendly and secure newsletter system that serves both our business interests and meets your expectations.

By unsubscribing from the newsletter, you can declare your revocation at any time with effect for the future in accordance with Art. 7 para. 3 GDPR. There is no legal or contractual obligation to provide your data, but it is not possible to send the newsletter without providing your data.

## **Retention period**

After registration for the newsletter, we store your data on the Ninox platform until revocation of your consent (unsubscription from the newsletter or notify us that you no longer wish to receive the newsletter).

## **Use of the Ninox platform**

### **Nature and scope of the processing**

SUMT stores the information that you provide in a Ninox database. In the course of using their product, personal data is entered and stored by the SUMT in the database applications created by us. Ninox have no knowledge of the type of data processed in the applications. This is the responsibility of the SUMT. In the event of support, support staff may, with the SUMT's consent, obtain knowledge of the stored data.

Your personal data will only be passed on to third parties and order processors in accordance with Art. 28 GDPR if this is necessary for the provision of the service.

The following service providers are used for hosting the platform:

Host Europe: <https://www.hosteurope.de/AGB/Datenschutzerklaerung/>

Amazon AWS: <https://aws.amazon.com/de/compliance/germany-data-protection/>

Redis: <https://redis.com/legal/privacy-policy/>

Amazon AWS : <https://aws.amazon.com/de/compliance/germany-data-protection/>

Hetzner: <https://www.hetzner.com/de/privacy-policy-notice>

### **Purpose and legal basis**

Ninox process SUMT's data for the purpose of hosting the platform, logins and logouts as well as backup, i.e. for the performance of the contract with SUMT pursuant to Art. 6 (1) lit. b GDPR.

The supplementary processing of SUMT's password for the registration of the user account is carried out for the purpose of providing a customer account. Furthermore, Ninox send e-mails to us with information and product updates within the scope of product information on the basis of legitimate interest pursuant to Art. 6 para. 1 lit. f GDPR.

### **Retention period**

SUMT can delete the applications created on the platform including the personal data. SUMT have registered a permanent customer account, so Ninox will store the purchase-related data beyond the end of the contract until SUMT revokes our consent (deletion of the

customer account). In both cases, SUMT's data will only be stored further if there are legal obligations to retain it (e.g. tax and commercial law).

## **Presence on social media platforms**

### **Nature and scope of the processing**

SUMT maintain accounts or channels on the networks mentioned below to provide you with information and offers also within social networks and to offer you further ways to contact us and to inform yourself about our what we are doing. In the following, we inform you about which data we or the respective social network process from you in connection with the call and use of our pages or accounts.

### **Data we process from you**

If you wish to contact us via messenger or direct message via the respective social network, we generally process your user name via which you contact us and, if necessary, store other data provided by you insofar as this is required to process/respond to your request.

The legal basis is Art. 6 para. 1 sentence 1 lit. f GDPR (processing is necessary to protect the legitimate interests of the controller).

(Statistical) usage data that we receive from the social networks

We receive automated statistics regarding our accounts via Insights functionalities. The statistics include, among other things, the total number of page views, likes, page activity and post interactions, reach, video views, and the percentage of men/women among our fans/ followers.

The statistics only contain aggregated data that cannot be related to individual persons. You are not identifiable to us through this.

### **What data the social networks process from you**

In order to view the content of our fan pages or accounts, you do not have to be a member of the respective social network and, in this respect, no user account for the respective social network is required.

Please note, however, that the social networks also collect and store data from website visitors without a user account when the respective social network is called up (e.g. technical data in order to be able to display the website to you) and use cookies and similar technologies, over which we have no control. Details on this can be found in the privacy policy of the respective social network.

Insofar as you wish to interact with the content on our pages or accounts, e.g. comment on, share or like our postings/contributions and/or contact us via messenger functions, prior registration with the respective social network and the provision of personal data is required. We have no influence on the data processing by the social networks within the scope of their use by you. To our knowledge, your data is stored and processed in particular in connection with the provision of the services of the respective social network, as well as for the analysis of user behaviour (using cookies, pixels/web beacons and similar technologies), on the basis of which advertising based on your interests is played both within and outside the respective social network. It cannot be ruled out that your data will be stored by the social networks outside the EU/EEA and passed on to third parties.

In the privacy policy/cookie policy of the social networks, you will find, among other things, information on the exact scope and purposes of the processing of your personal data, the retention period/deletion as well as guidelines on the use of cookies and similar technologies

in the context of registration and use of the social networks. There you will also find information on your rights and objection options.

## **Facebook**

When you visit our Facebook page, Facebook collects, among other things, your IP address and other information that is present on your PC in the form of cookies. This information is used to provide us, as operators of the Facebook pages, with statistical information about the use of the Facebook page. Facebook provides more detailed information on this at the following link: <https://facebook.com/help/pages/insights>.

It is not possible for us to draw conclusions about individual users by means of the statistical information transmitted. We only use this information to respond to the interests of our users and to continuously improve our online presence and ensure its quality.

We collect your data via our fan page only to realize a possible provision for communication and interaction with us. This collection usually includes your name, message content, comment content and the profile information you provide “publicly”.

The processing of your personal data for our above-mentioned purposes is based on our legitimate business and communicative interest in offering an information and communication channel pursuant to Art. 6 (1) lit. f GDPR. Should you, as a user, have given your consent to the data processing vis-à-vis the respective provider of the social network, the legal basis of the processing extends to Art. 6 (1) lit. a, Art. 7 GDPR.

Due to the fact that the actual data processing is carried out by the provider of the social network, our access to your data is limited. Only the provider of the social network is authorized to fully access your data. Due to this, only the provider can directly take and implement appropriate measures to fulfil your user rights (information request, deletion request, objection, etc.). The assertion of corresponding rights is therefore most effective directly against the respective provider.

We are jointly responsible with Facebook for the personal content of the page. Data subject rights can be asserted with Facebook Ireland as well as with us.

The primary responsibility for the processing of Insights Data lies with Facebook under the GDPR and Facebook complies with all obligations under the GDPR with respect to the processing of Insights Data, Facebook Ireland provides the essence of the Page Insights Supplement to Data Subjects.

We do not make any decisions regarding the processing of Insights data and any other information resulting from Art. 13 GDPR, including legal basis, identity of the controller and retention period of cookies on user terminals.

Further instructions can be found directly at Facebook (Supplemental Agreement with Facebook): [https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum).

## **Google Services (eg Embedded YouTube videos, Google Docs etc)**

We use Google forms to collect information from you about upcoming events and to gather feedback from you, as well as integrating YouTube videos into our online presence, which are stored on the YouTube platform and can be played directly from our website. Google forms and Google docs of Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA., as well as YouTube are services of Google LLC, D/B/A YouTube, 901 Cherry Ave., San Bruno, CA 94066, USA (hereinafter as ‘Google’). The videos are all embedded in the so-called ‘2-click-mode’, which means that no data about you as a user is being transferred to Google if you do not activate the video function. Before the video function’s

activation, only a preview image loaded from our web service provider (Heart Internet) is being displayed.

Data will only be transferred to Google if you submit information or activate such video functions. Once being activated, we have no influence on this data transfer. The data transfer is carried out regardless of whether Google provides a user account through which you are logged in or whether no user account exists. If you are logged in at Google, your data will be assigned directly to your account.

We use Google services on our website to allow submission of information or to view activities in an easy way.

The legal basis for the processing of your personal data is your consent according to Art. 6 para. 1 sentence 1 lit. a GDPR. You grant this consent by submitting information or activating the video function. If activated, your personal data will be transferred to Google as described above.

In the course of the data transfer to Google, your personal data will be transferred to servers of Google, which might also be located in the USA. The USA is a country that does not have a level of data protection which is adequate to that of the EU. In particular, this means that personal data can be accessed by US authorities in a simplified manner and that there are only limited rights to such measures. If you submit information or activate the YouTube video function, you expressly consent to the transfer of data to Google and to the transfer of your personal data to servers located in the USA.

If you have given your consent, you have the right to revoke it at any time without affecting the lawfulness of the processing carried out on the basis of the consent until revocation. You can revoke your consent at any time for the future by deactivating the slider of the category "YouTube" in the Cookie Settings. You can ask for the deletion of information submitted to us by asking us to do so.

Further information on data processing, in particular on the legal basis and storage period by Google can be found in the provider's privacy policy (<https://policies.google.com/privacy>) and in the privacy banner on the YouTube platform. There you will also find further information on your rights and setting options to protect your privacy.

Google may also process your personal information in the United States, a third country without an adequate level of data protection.

After you have submitted information to us on Google applications such as 'forms', we store your data until revocation of your consent.

## **MailChimp**

We use MailChimp a service of Intuit Inc. 2700 Coast Avenue Mountain View, CA 94043 to send emails to you with your consent. Your email address is entered into the system and together with the information that SUMT wishes to convey to you this is sent by MailChimp to you.

The legal basis for the processing of your personal data is your consent according to Art. 6 para. 1 sentence 1 lit. a GDPR.

In the course of the data transfer to MailChimp, your personal data will be transferred to servers of MailChimp, which might also be located in the USA. The USA is a country that does not have a level of data protection which is adequate to that of the EU. In particular, this means that personal data can be accessed by US authorities in a simplified manner and

that there are only limited rights to such measures. If your information is you consent to the transfer of data to Google and to the transfer of your personal data to servers located in the USA.

If you have given your consent, you have the right to revoke it at any time without affecting the lawfulness of the processing carried out on the basis of the consent until revocation. You can revoke you consent at any time for the future. You can ask for the deletion of information submitted to us by asking us to do so.

Further information on data processing, on the legal basis and storage period by Intuit can be found in the provider's privacy policy (<https://www.intuit.com/privacy/statement/>) and in particular for the UK Intuit Data Protection Administration, Cardinal Place, 80 Victoria Street, London, United Kingdom, SW1E 5JL (<https://quickbooks.intuit.com/uk/gdpr/>). There you will also find further information on your rights and setting options to protect your privacy. Intuit may also process your personal information in the United States, a third country without an adequate level of data protection.

After you have submitted information to us, we store your data until revocation of your consent.

### **Supported Giving**

We use Supported Giving of Bushy Hill, Edwins Hall Road, Woodham Ferrers, Essex, CM3 8RU, United Kingdom to facilitate online giving by you to SUMT. If you choose to give via this service then you will need to supply personal data that can be used to help identify you such as name, address and email address. You will also need to submit financial information in the form of a credit or debit card number to facilitate the donation.

The legal basis for the processing of your personal data is your consent according to Art. 6 para. 1 sentence 1 lit. a GDPR.

During the data transfer to Supported Giving, your personal data will be transferred to servers that Supported Giving uses.

If you have given your consent, you have the right to revoke it at any time without affecting the lawfulness of the processing carried out on the basis of the consent until revocation. You can revoke you consent at any time for the future. You can ask for the deletion of information submitted to us by asking us to do so.

Further information on data processing, on the legal basis and storage period by Supported Giving can be found in the provider's privacy policy (<https://supportedgiving.com/privacy-policy/>). There you will also find further information on your rights and setting options to protect your privacy.

Information relating to your online donation will be shared with SUMT so that we can account for sums of money received to meet financial regulations in the Isle of Man and if appropriate for Manx residents to supply you with a certificate to show giving over the previous financial year to the relevant income tax authority.



# Use of the Dropbox platform

## Nature and scope of the processing

SUMT stores limited information that you provide on the Dropbox platform. In the course of using their product, personal data is entered and stored by the SUMT in the Dropbox files created by us for such purposes. Further information about Dropbox can be found in the privacy notice –

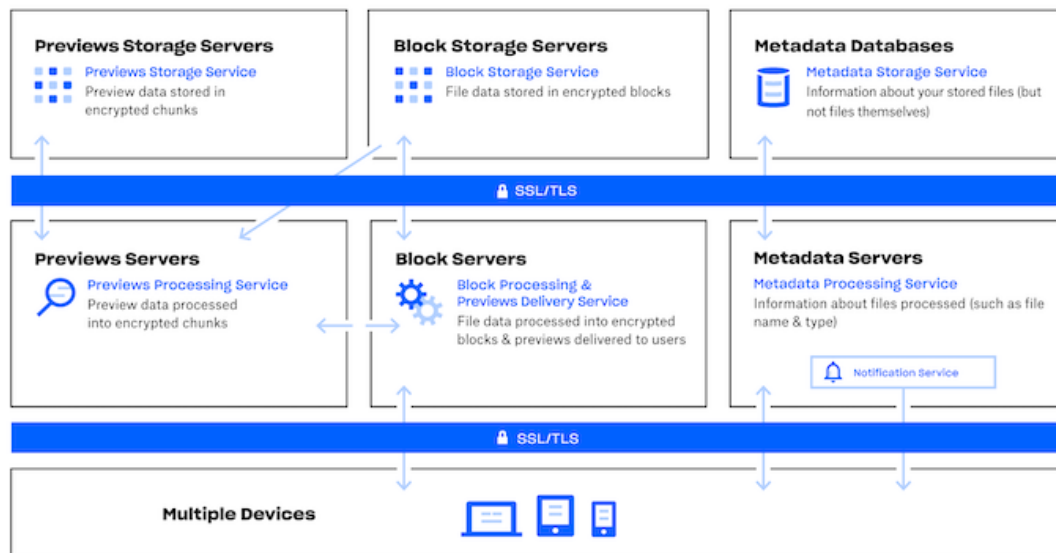
[www.dropbox.com/privacy](http://www.dropbox.com/privacy)

Once a file is added to your Dropbox, it's synced to Dropbox's secure online servers. All files stored online by Dropbox are encrypted and kept in secure storage servers. Storage servers are located in data centers across the United States. Additionally, storage servers are available in Australia, the European Union, Japan, and the United Kingdom.

To keep files safe, Dropbox is designed with multiple layers of protection, distributed across a scalable, secure infrastructure. These layers of protection include:

- Dropbox files at rest are encrypted using 256-bit Advanced Encryption Standard (AES)
- Dropbox uses Secure Sockets Layer (SSL)/Transport Layer Security (TLS) to protect data in transit between Dropbox apps and our servers
- SSL/TSL creates a secure tunnel protected by 128-bit or higher Advanced Encryption Standard (AES) encryption
- Dropbox applications and infrastructure are regularly tested for [security vulnerabilities](#), and hardened to enhance security and protect against attacks
- Public files are only viewable by people who have a link to the file(s)

Here's a diagram of how the service works:



SUMT Dropbox users can access their files and folders at any time through the desktop, web, and mobile clients, or through applications connected to Dropbox. All of these clients connect to secure servers to provide access to files, allow file sharing with others, and update linked devices when files are added, changed, or deleted. The Dropbox service operates various services that are responsible for handling and processing both metadata and raw block storage.

## **Purpose and legal basis**

Dropbox process SUMT's data for the purpose of storing files of data, logins and logouts as well as backup, i.e. for the performance of the contract with SUMT pursuant to Art. 6 (1) lit. b GDPR.

The supplementary processing of SUMT's password for the registration of the user account is carried out for the purpose of providing a customer account. Furthermore, Dropbox send e-mails to us with information and product updates within the scope of product information on the basis of legitimate interest pursuant to Art. 6 para. 1 lit. f GDPR.

SUMT can delete the files created on the platform including the personal data. SUMT have registered a permanent customer account, so Dropbox will store the purchase-related data beyond the end of the contract until SUMT revokes our consent (deletion of the customer account). In both cases, SUMT's data will only be stored further if there are legal obligations to retain it (e.g. tax and commercial law).

## **What are your data protection rights?**

SUMT would like to make sure you are fully aware of your data protection rights.

Every user is entitled to the following:

- The right to access – You have the right to request SUMT for copies of your personal data.
- The right to rectification – You have the right to request that SUMT correct any information you believe is inaccurate. You also have the right to request SUMT to complete the information you believe is incomplete.
- The right to erasure – You have the right to request that SUMT erase your personal data, under certain conditions.
- The right to restrict processing – You have the right to request that SUMT restrict the processing of your personal data, under certain conditions.
- The right to object to processing – You have the right to object to SUMT's processing of your personal data, under certain conditions.
- The right to data portability – You have the right to request that SUMT transfer the data that we have collected to another organisation, or directly to you, under certain conditions.

If you would like to exercise any of these rights, please contact us

At our email: [hub@sumt.im](mailto:hub@sumt.im)

Or write to us: Manor Ark, Pulrose Road, Douglas IM2 1AS

The SUMT website contains links to other websites. Our privacy policy applies only to our website and the services that we directly use, so if you click on a link to another website, you should read their privacy policy.

## **Changes to our privacy policy**

SUMT will keep its privacy policy under regular review and places any updates on this web page. This privacy policy was last updated on 11 August 2023.

## **How to contact us**

If you have any questions about SUMT's privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us.

At our email: [hub@sumt.im](mailto:hub@sumt.im)

Or write to us at: Manor Ark, Pulrose Road, Douglas IM2 1AS

### **How to contact the appropriate authority**

Should you wish to report a complaint or if you feel that SUMT has not addressed your concern in a satisfactory manner, you may contact the Information Commissioner's Office:  
Isle of Man Information Commissioner, P.O. Box 69, Douglas, Isle of Man, IM99 1EQ  
Telephone: +44 1624 693260 Email: [ask@inforights.im](mailto:ask@inforights.im)