

PRIVACY NOTICE

Draft Version 6

Effective Date: To be inserted after approval

This notice explains how personal information is collected, used, shared, stored and protected across SOUL Church Ltd, SOUL Nursery, SOUL Foundation and Soul Enterprise Trading Ltd.

1. ABOUT THIS PRIVACY NOTICE

This Privacy Notice applies when you attend, volunteer, work, donate, book, buy from, contact or otherwise interact with a SOUL organisation, including through our websites, forms, events, services, nursery, café, bookshop, ministries, community work and social media.

It explains what information we collect, why we use it, which SOUL organisation is responsible for it, who we may share it with, how long we keep it and the rights you have.

Using our website does not mean that you “agree” to this notice. Where we need your consent for a specific activity, such as certain marketing, photography or the use of non-essential cookies, we will ask for it separately.

2. WHO IS RESPONSIBLE FOR YOUR INFORMATION

The legal organisation that decides why and how your personal information is used is called the data controller. The controller depends on which SOUL service or activity you use.

SOUL AREA	LEGAL POSITION & MAIN ACTIVITY	REGISTRATION DETAILS	CONTROLLER POSITION
SOUL Church Ltd	Main church charity and company. Covers services, events, pastoral care, safeguarding, serving, giving and communications.	Company 07260215 Charity 1138459 ICO ZA105573	Controller
SOUL Nursery	Nursery provision operated by SOUL Church Ltd, with nursery duties for children, carers, funding and Ofsted records.	ICO ZC113610	SOUL Church Ltd is controller (nursery is not a separate legal entity).
SOUL Foundation	Separate charity covering donations, fundraising, volunteers, community support, outreach and Foundation communications.	Charity 1184934 ICO ZA159849	Separate Controller
Soul Enterprise Trading Ltd	Trading company covering café, bookshop, sales, bookings, refunds and related financial records.	Company 11093104 ICO ZC113872	Separate Controller

All four areas use the SOUL name and may share staff, premises and systems, but personal information is not freely passed between them. Each controller remains legally responsible. A central data protection contact coordinates requests on behalf of the SOUL entities.

3. HOW THE SOUL ORGANISATIONS SHARE INFORMATION

SOUL Church Ltd, SOUL Foundation and Soul Enterprise Trading Ltd operate under a written data sharing agreement governing roles, security, access controls, retention and rights. Unrestricted sharing is strictly prohibited. Information is shared only where:

- It is necessary to provide a service or fulfill a specific request;
- A shared support function, system or authorized staff member requires access for agreed purposes;
- You have given valid consent or explicit request;
- There is a safeguarding, health and safety, legal, regulatory or emergency reason.

4. THE PERSONAL INFORMATION WE MAY COLLECT

CATEGORY	EXAMPLES OF DATA COLLECTED
Identity & Contact Details	Name, address, email, telephone number, date of birth, emergency contact and family relationships.
Church & Participation	Attendance, groups, serving teams, events, regular contact (may reveal religious belief).
Children & Nursery	Child/carer details, attendance, funding, permissions, collection arrangements, learning/care records.
Health & Accessibility	Allergies, dietary or accessibility needs, medical information, first aid and accident records.
Pastoral & Safeguarding	Support or prayer requests, records required to protect children or vulnerable adults.
Donation & Financial	Donations, Gift Aid declarations, giving history, payment status (full card details are not held).
Customer & Booking	Café, bookshop, play area, event bookings, purchases, receipts and complaints.
Communications & Marketing	Contact preferences, consent records, subscription history and interaction metrics.
Images, Audio & Video	Photographs, recordings and livestream footage from clearly signposted services/events.
Staff & Volunteers	Applications, references, role records, right-to-work checks, DBS/safeguarding checks, performance.
Website & Technical	IP address, browser, device logs, cookie preferences and online form submissions.

5. LAWFUL BASES FOR PROCESSING

We process personal data only when a valid lawful basis applies under data protection regulations:

PURPOSE	OPERATIONAL EXAMPLES	MAIN LAWFUL BASES
Services & Bookings	Church events, nursery, café, bookshop, play area, orders & refunds.	Contract, Legitimate Interests, Legal Obligation.
Church & Pastoral	Groups, serving rotas, membership, prayer and support records.	Legitimate Interests, Special Category conditions, Consent.
Safeguarding	Protecting individuals, first aid, accident logs, authority referrals.	Legal Obligation, Vital Interests, Public Interest.
Nursery Care	Attendance, funded hours, development, care, Ofsted requirements.	Contract, Legal Obligation, Vital Interests.
Donations & Giving	Processing gifts, Gift Aid declarations, donor stewardship, tax audit.	Legal Obligation, Legitimate Interests, Soft Opt-in.
Trading Activities	Customer service, sales, delivery, accounting, fraud prevention.	Contract, Legal Obligation, Legitimate Interests.
Staff & Volunteers	Recruitment, rotas, payroll, DBS checks, wellbeing, conduct.	Contract, Legal Obligation, Employment Conditions.
Communications	Service updates, newsletters, marketing, preference management.	Consent, Legitimate Interests, PECR compliance.
Legal & Regulatory	Tax, accounting, Charity Commission, Ofsted, insurance & claims.	Legal Obligation, Defense of Legal Claims.

Special Category & Criminal Offence Data

Information concerning health, religious beliefs, DBS checks, or safeguarding requires extra protection. We process this data under strict legal conditions, including explicit consent, legitimate activities of a non-profit religious body, employment/social protection law, or vital interests. Access is restricted strictly to authorized personnel.

6. SHARING, TRANSFERS & SECURITY

We share data with vetted third-party suppliers (such as ChurchSuite, Planning Center, Google Workspace, payment processors) bound by written agreements. We do not sell personal data. International transfers use approved safeguards like UK Standard Contractual Clauses or adequacy decisions.

7. DATA RETENTION & YOUR RIGHTS

Data is retained only as long as necessary for operational, legal, tax, or safeguarding requirements. Safeguarding records are kept in line with statutory guidance. Under UK GDPR, you have rights including:

- **Access & Correction:** Request copies or updates to your personal data.
- **Erasure & Restriction:** Request deletion or restricted processing where applicable.
- **Objection & Withdrawal:** Object to marketing or processing based on legitimate interests.

8. AI, COOKIES & DIGITAL MEDIA

Approved AI tools may support administrative workflows; confidential or sensitive data is never entered into public AI tools. Websites use necessary cookies, with optional analytics subject to consent.

9. CONTACTING US & COMPLAINTS

For any queries, privacy requests, or complaints regarding how your data is handled, please contact the central Data Protection Lead:

SOUL DATA PROTECTION LEAD

Email: dataprotection@soulchurch.com

Phone: 01603 488880

Post: 55 Heartsease Lane, Norwich, NR7 9NT

Web: www.soulchurch.com

REGULATORY AUTHORITY

You have the right to lodge a complaint with the Information Commissioner's Office (ICO).

Website: www.ico.org.uk

DOCUMENT CONTROL & APPROVAL RECORD

DOC. REF	ISSUE NO.	ISSUE DATE	DESCRIPTION	OWNER
SC/P/PP	6	9/10/26	Privacy Notice	A Cooper