



Stichting COP City Churches

Privacy Policy and Notice

Introduction

Welcome to the City Churches District website on which this policy is hosted, owned and managed by Stichting COP City Churches..

This Privacy Notice describes how Stichting COP City Churches collects, uses, disclose, transfer, store, retain or otherwise process your information, whether provided through the website, or acquired directly by any other means, and will be dealt with in accordance with the law. By continuing to browse and use this website you are accepting the terms and conditions of use, which governs Stichting COP City Churches's relationship with you.

Scope of the policy

Stichting COP City Churches takes your privacy very seriously and this policy/notice has been adopted as it recognises the rights of people to keep their personal information private.

1. By providing personal data, including by use of this website, you agree to allow us to contact you, including by mail, email, telephone, or SMS text message, for the purposes of our business services:
 - a. For our **legitimate interests**, in accordance with current data protection regulations; or
 - b. Based on the **consents**, you have given.

Interpretation

- Whenever “**We**”, “**Our**” or “**Us**” is used in this policy/notice it is referring to your relationship with and an obligation or right, in Stichting COP City Churches
- “**Data Controller**” is the entity that determines the purpose for which personal data is collected and processed.

- **“Data Processor”** is the entity processing personal data on behalf of the Data Controller.
- **“Personal Data”** is any information about a living individual, which allows them to be identified, such as a name, email or photograph and can identify them alone or in conjunction with other information.

Data Protection Law

This policy explains how we comply with laws and regulations in our respective countries and the General Data Protection Regulation (GDPR) and the Privacy & Electronic Communications Regulations 2003 (“the PECR”) relating to electronic communications (jointly and severally, “the Law”)

Stichting COP City Churches has agreed that:

1. The Stichting COP City Churches will manage contents on the website and in particular, registration for events and online giving.
2. All Personal Data relating to persons resident in the EEA acquired from or relating to such persons accessing the website for any purpose including, without limitation:
 - a. Donating;
 - b. Registering for any event;
 - c. Acquiring goods or services through this website. Will be dealt with in accordance with this policy and “the law”.
3. Such information will be kept confidential and only be provided to third parties, who assist us, provide goods or services requested by such persons, or with their prior consent.
4. We will adhere to the Principles of Data Protection as detailed in GDPR. Your information will be:
 - a. Processed lawfully, fairly and in a transparent manner.
 - b. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
 - c. Adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.
 - d. Accurate and, where necessary, kept up to date.
 - e. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
 - f. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage using appropriate technical or organisational measures.

Data Controllers And Data Processors

1. Where, Stichting COP City Churches is a Data Controller we will be responsible to comply with its legal obligations under GDPR. Based on consent and/or permission, personal data may be shared with named third parties we may either process such data on behalf of or as a joint Controller use for its own purposes.
2. Where, Stichting COP City Churches and third party are joint Controllers, both are responsible for how your data is processed.

Your Rights

1. Where you have provided your consent to us processing your personal data, you may withdraw this consent at any time. In addition, 'the law' gives you the right, under certain circumstances:
 - a. To request in writing and securely obtain copies of the personal information we hold about you.
 - b. To correct or update your personal information held by us.
 - c. To request us to stop using your personal information for marketing purposes or for any other purpose where there is no legal requirement for continued processing.
 - d. To object to profiling activities based on our legitimate interest.
 - e. To request to have all personal data deleted.
2. To exercise any of these rights please contact or contact the Data Protection Officer Hillary B. Annan at 'info@citychurchesdistrict.nl'
3. Please tell the Stichting COP City Churches as soon as any of your contact details change so that records can be kept up to date. We will take reasonable steps to correct any of your information, which is inaccurate, incomplete, or out of date.
4. If you wish to have your personal information deleted, or if you no longer attend Stichting COP City Churches and wherever practicable that information will be deleted. Please contact the Data Protection Officer at Stichting COP City Churches.
5. A request to access, amend or delete your personal information may be refused in certain circumstances. If refused, you will be provided with a reason for the decision and, in the case of amendment, will note with your personal information that its accuracy is disputed.

Modifying your preferences

1. If at any point you would like to change your preferences and:
 - a. you do not wish to receive further communications from Stichting COP City Churches
 - b. you wish to change the way you receive any communication.
2. follow the procedure under **Your Rights** above
3. You will have the opportunity to decline to accept communications at any time and discontinue receiving such communication by:
 - a. Emailing: Info@citychurchesdistrict.nl

How personal information is collected

1. Personal Data is collected each time you are in contact with us, for example, when you:
 - a. Visit the website.
 - b. Donate to Stichting COP City Churches
 - c. Register for a Stichting COP City Churches service, conference and or event.
 - d. Apply for a job, contract or volunteer at Stichting COP City Churches
 - e. Provide your contact details, in writing or orally, to the Stichting COP City Churches.
 - f. Purchase goods or services from Stichting COP City Churches, through the website, or directly from Stichting COP City Churches and when you provide credit or debit card details.
 - g. Participate in other Stichting COP City Churches activities (e.g. Google meets, Zoom, Teams etc)
 - h. Contact us by means such as email, text, letter, telephone.
 - i. Have face to face meetings with Stichting COP City Churches staff, team members etc.
 - j. Access social media platforms such as Instagram, YouTube, Spotify, etc.
 - k. Consent to and/or grant permission with access to your personal data to Stichting COP City Churches.

Types of information collected

1. The types of personal information collected by us include:
 - a. Personal details such as your title, name, and date of birth.

- b. Contact details such as postal address, post code, email, mobile and telephone numbers.
- c. Relevant to our business requirements, demographic information such as marital status, nationality, education, employment/qualifications, and family details.
- d. Financial information such as donation history and your bank details.
- e. Whether you are a taxpayer in the place where the Stichting COP City Churches is registered.
- f. Spouse and family details when you are an employee at Stichting COP City Churches (e.g. next of kin)
- g. Non-financial information such as passports, driving licences and financial information such as salary records, tax codes and expenses claims.
- h. Employee and contractor data such as qualifications, languages, and experience.
- i. Records of your contact with us.
- j. Photographs, videography and recordings provided by you or taken at Stichting COP City Churches in services or events.
- k. Visits to the website to enable Stichting COP City Churches to improve its effectiveness and better promote services.

Sensitive/Special Category Personal Information

1. We may collect and store sensitive personal information (Special Category Information under GDPR) such as:
 - a. **Health** information provided during employment required to gain assistance.
 - b. **Religious** information provided for the purposes of equality and inclusion.

How we use your information

We collect information about you for a variety of uses based on different reasons. For example, some of the information is disclosed to register for activities or events, sometimes we are required by law and regulations to collect and process information about you, and at other times we consider it is in our legitimate charitable interest to collect and process information.

1. Your personal information will be dealt with in accordance with “the Law”
 - a. It is never sold, nor given away.
 - b. It is only shared with others where you have given consent or where it is permitted or required either contractually or legally.

We will not use your personal information for any other purpose without first seeking your consent, unless authorised or required by law.

Consent for Processing Personal Data of Minors

Stichting COP City Churches may process the personal data of children under the age of 16 only with the explicit consent of a parent or legal guardian. By providing personal information relating to a minor, the parent or guardian confirms that they have the authority to give such consent and agree to the collection, use, and secure storage of the child's data for the specific purposes communicated by Stichting COP City Churches. This includes administrative records, pastoral care, event registration, and safety-related communications. Consent may be withdrawn at any time, after which the minor's personal data will be deleted unless retention is required by law or necessary for the protection of the child's vital interests. Stichting COP City Churches ensures that all data is processed in accordance with the AVG and handled with the highest standards of confidentiality and care.

Legal Basis for using your personal information

We will only process your personal information where we have a legal basis to do so. The legal basis will depend on the reason or reasons we collected and need to use your information.

1. Under "the Law" in almost all cases the legal basis will be:
 - a. As you have consented to Stichting COP City Churches using your information for a particular purpose.
 - b. To fulfil any contractual relationship we have with you in relation to provision of products or services and/or events etc.
 - c. We may need to use your personal information to comply with a legal obligation, such as protection and welfare of individuals.
 - d. To process sensitive / special category personal data that is relevant to us as an organisation.
 - e. Where you have given consent for us to contact you by email, phone, or SMS, to send you information.

Data storage and who sees your information

1. Information you provide electronically, including through this website, may be held on computers owned and kept by the Stichting COP City Churches.
2. Information you provide in paper form, such as consents, letters or recorded in meetings with staff and team members or contractors, may be transferred to secure virtual systems or stored in secure cloud based filing systems.
3. Subject to compliance with our data management policies and procedures, and in compliance with the above Data Protection Principles, information may be accessed, used, and stored:
 - a. On Google Drive owned and kept by Stichting COP City Churches
 - b. By a limited number of staff and team members under a duty of confidentiality who are involved in development, maintenance, and operation of the website
 - c. Services provided by third parties, or who act for the uses set out in this policy.
 - d. Other purposes approved by you.
 - e. Those parties may also process information, fulfil, and deliver orders, process credit card payments, and provide support services to us.
4. Third party service providers may process information, fulfil, and deliver orders, process donations and credit card payments, and provide support services on our behalf. Where such details are shared, agreements in place restrict the use of your information to the purpose for which it is provided and ensure it is stored securely and in accordance with applicable data protection and privacy laws.
5. We do not sell or pass any of your personal information to any other organisation and/or individuals without your express consent, unless required by law.

How long we retain your information

1. We will only keep your personal information for as long as it is required and in accordance with "the Law" and other legal requirements.
2. If you have indicated that you no longer wish to hear from us, we will keep the minimum information necessary to ensure that no future contact is made.
3. However, even after you modify your communication preferences, we may retain copies of information about you for a period that is consistent with applicable law, applicable statute of limitations or as we believe is reasonably necessary to comply with applicable law, regulation, or legal process.

4. Where we hold Special Category Information, unless we have evidence of your regular contact with us or we are required by law to retain it, the sensitive information will be deleted after a period.

Financial records and card details:

All financial payments and records are held in accordance with The Payment Card Industry Data Security Standard ("PCI DSS").

All credit/debit card donations made online or by phone, are made securely through third party service providers and payment gateways, which comply with the PCI DSS. Unredacted card details are not recorded and stored on our systems.

We do not store unredacted financial details (credit or debit card numbers) obtained through online transactions nor do we pass any information to third parties, except where we are legally required to do so, to assist fraud reduction, or to provide a service requested and minimise credit risks.

Marketing Communications

1. The **Privacy and Electronic Communications Regulations (PECR)** gives you the right:
 - a. To choose whether to receive marketing communication from us by email, text, or telephone.
 - b. To know about the cookies Stichting COP City Churches uses, so that you can decide whether to give permission to store a cookie on your device.

You can change the way you are contacted, or the kind of material sent to you, at any time by contacting us by mail or e-mail using the contact details below.

Security

1. Reasonable steps will be taken to keep secure any personal information, which is held.
2. Personal information, held electronically, is stored in a secure server or secure files.
3. The Internet is not a secure method of transmitting information. Accordingly, no responsibility is accepted for the security of information you send to or receive from us over the internet or for any unauthorised access or use of that information.
4. Security measures are taken to protect your information from access by unauthorised persons and against unlawful processing, accidental loss, destruction, and damage.

Links and social media

1. This website may also include links to other websites or may provide social media buttons, permitting sharing web content directly to Stichting COP City Churches social media platforms.
2. We do not endorse external social media website(s) and have no responsibility for the content unless posted by or approved by us nor are we responsible for the cookies such websites may contain.
3. Use of such buttons or links is at your own risk and you must verify authenticity of sites before posting or providing personal information on such sites. We do not ask for passwords or personal details on social media.

Downloads

Any documents or files made available to download from our website are provided at users' own risk.

Reporting concerns

1. Please contact either Stichting COP City Churches and/or Data Protection Officer if you wish to raise a concern about handling of your personal information.
2. You also have the right to lodge a complaint with the Data Protection Authority Office (see contact details below) about how your data is managed.

Subject Access Requests

1. Stichting COP City Churches has processes in place to be able to deal efficiently with any requests for access to information under the data protection legislation, e.g. for an individual to obtain a copy of the information being held about them.
2. A subject access request must be forwarded to Stichting COP City Churches' Certified Data Protection Officer who will arrange for the relevant data to be collected (subject to the suitability and appropriateness of the request within the terms of the GDPR guidelines).
3. Upon collection, any third-party identifying information will be removed (or consent to reveal obtained from the relevant individual), and the information forwarded to the requester.

4. In the event that Stichting COP City Churches is shown to be holding data on individuals which is inaccurate, a request for change must be submitted to Stichting COP City Churches' Certified Data Protection Officer.
5. The change request will be given careful consideration and either enacted (i.e. the inaccurate information corrected or removed) or, in certain cases, an explanation provided to the requester for why no change is deemed necessary.
6. Data protection law allows exemptions from complying with data subject rights in specific and limited circumstances. Stichting COP City Churches will normally apply the exemptions where they are engaged, unless it is satisfied that it is appropriate or reasonable not to do so.
7. A data subject also has the right to complain to the Dutch Data Protection Authority (AP) if they believe that there has been an infringement by Stichting COP City Churches of data protection legislation in relation to the data subject's personal data.
8. A data subject may also pursue a legal remedy via the courts.
9. Further information on the rights of data subjects is available from the Dutch Data Protection Authority (AP) website.
10. Additional guidance for staff and team members on how to deal with requests to exercise data subject rights is available by contacting the Stichting COP City Churches's Certified Data Protection Officer.

Training

1. Stichting COP City Churches recognises that data protection training is crucial so that all staff and team members understand their responsibilities relating to data protection and the use of personal data.
2. Failure to comply with data protection legislation could lead to serious consequences, and in some cases may result in significant fines or criminal prosecution.
3. Stichting COP City Churches will monitor completion rates of data protection courses to ensure that all staff and team members are appropriately trained.
4. In addition to the corporate training, some post-holders are required to undertake further information governance or data protection training where appropriate for a particular role or within a specific service area.

Changes to this privacy notice

1. Stichting COP City Churches may amend this policy/notice from time to time to reflect changes in best practice, security, and control and to ensure compliance with any changes or amendments to the law or other applicable legislation in the EEA.
2. Any amended version will be available on the website.
3. We suggest you visit regularly to keep up to date with any changes.

EEA Representative

Stichting COP City Churches is a Data Controller based in The Netherlands, as an EEA country no assistance will be required with the collection, storage, use and transfer of information and compliance with all applicable data protection laws.

Data Security and Technical Measures

All form data submitted through our website is securely stored in a protected MongoDB database that uses authentication-level access controls and encryption for both data in use and data at rest. Stichting COP City Churches does not use any tracking tools, cookies, or behavioural analytics that monitor users. Additionally, HTTPS is enabled by default on every page of our website to ensure encrypted communication between the user's device and our servers. These measures help safeguard the confidentiality, integrity, and availability of all personal data processed by Stichting COP City Churches in accordance with the AVG (GDPR).

Encryption and Secure Transmission

All data transmitted through our website is protected by HTTPS using modern TLS protocols (TLS 1.2/1.3). Data entered into our forms is end-to-end encrypted from the user's browser to Cloudflare. Payload Cloud, our hosting provider, also enforces HTTPS internally, ensuring that communication between Cloudflare and the Payload Cloud servers is encrypted with TLS as well. This means that the entire data path from the user's browser, through Cloudflare, to our hosting infrastructure is fully secured and encrypted. These measures provide robust protection for all personal data processed by Stichting COP City Churches, in alignment with AVG (GDPR) requirements.