

London Centre of Self-Realization Fellowship Church – UK Privacy Notice

Your information privacy is extremely important to us. We, Self-Realization Fellowship Church - UK, “SRF-UK”, and London Centre of Self-Realization Fellowship Church – UK, the “Centre” (collectively “London Centre” or “we” or “us”), have prepared this Privacy Notice (“Notice”) to explain how we collect, use, protect, and disclose information and data.

This Privacy Notice applies to you if you:

1. visit the London Centre websites at srf-london.org.uk (collectively the “Site”), have subscribed to our email list, or use any London Centre internet services (collectively the “Services”);
2. participate with us (through the website or otherwise), including if you have applied to become, or are a member of London Centre, or attend our retreats, events, Sunday School or Teen Programs, or have made a donation to us (we refer to you as a “member”); or
3. are a volunteer, or have applied to volunteer, including as a volunteer Council Member, Service Reader, Usher, Sunday school teacher and or other volunteer (“Volunteer”).

1. London Centre as a Data Controller

This Notice is provided by the London Centre, which is the data controller for your data under the EU General Data Protection Regulation 2016/679 (“GDPR”).

Our contact details are as follows:

London Centre of Self-Realization Fellowship Church - UK, 82A Chiltern Street, London W1U 5AQ

The Centre is a legal branch of SRF-UK and is spiritually affiliated with Self-Realization Fellowship Church (“SRF”), a worldwide non-profit religious organization with international headquarters in Los Angeles, California. As explained in this Notice, we may share information with SRF so that SRF can assist us with carrying out our responsibilities to the London Centre and SRF community. London Centre and SRF are each data controllers. This means each entity is separately responsible to you for how each processes your data.

2. The Categories of Personal Data We Process

When you use our Site or Services, participate with London Centre as a member, or share personal data with us through other contact with us, we may process the following categories of personal data about you.

Personal Information

- Names, titles, and photographs (if you provide one).
- Contact details such as telephone numbers, addresses, and email addresses.
- Personal information that you provide to us including information in correspondence with us, or in the course of meditation services or other activities at London Centre. This information may include information you provide to us about spiritual matters, personal or familial health, financial, marital, work-related matters, and other information about matters of a confidential nature.
- Records of your donations and related payment information (such as bank account numbers, payment card numbers, payment/transaction identifiers).

- Records relating to your bequest to SRF-UK or SRF, including estate planning documents (wills, trusts and powers of attorney) and beneficiary designation forms.
- Other operational personal data created, obtained, or otherwise processed in the course of carrying out our activities, including but not limited to London Centre reference number, and your history of volunteer activities with London Centre.
- If you volunteer for a role working with children: your employment history, address history, date of birth, volunteer activities with other religious organisations, previous experience of looking after or working with children, references and criminal history information (information regarding police investigations, charges, cautions or convictions relating to any criminal offences).
- If your child attends our Sunday School program: your and your child's name and your (parent) contact information, records of Sunday School attendance and certain medical information related to your child (allergies/illnesses relevant to Sunday School attendance)
- The data we process may constitute sensitive personal data because, as a church, we necessarily process data suggestive of your religious beliefs. We may also process other categories of sensitive personal data including about your mental and physical health, family or employment relationships, and other information of this nature that you have provided us.

Usage Data and Site Activity

- We automatically collect the following information about your device and your use of our Site or Services: your browser type and operating system; web pages you view; links you click; your IP address, MAC address, Unique Device Identifiers (UID); the length of time you visit our Site and or use our Services; and the referring URL, or the webpage that led you to our Site ("**Usage Data**"). We use this information to monitor and improve the Site and Services, enhance your online experience and to enable us to provide you with an easier and more personalized experience and level of service.

Cookies and Anonymous Identifiers

- Please see our [Cookie Policy](#) for further information about the cookies we use, and your choices regarding cookies.

3. Why We Process Your Personal Data

We use your personal data for some or all of the following purposes:

- To provide you with religious and spiritual services including Meditation and Inspirational Reading Services, Sunday School programs, monastic visits, social gatherings, spiritual support, prayers, and other services that you request;
- To contact and communicate with you: (i) in relation to your volunteer activities; (ii) to keep you informed about news and events, activities and services in which you may be interested; and/or (iii) to respond to communications from you;
- To provide you with the Site and Services, including to send you alerts about your account;

- To better understand how users access and use our Site, Services and London Centre Newsletter, to maintain, support, and improve our Site and Services, to respond to user preferences, and for research and analytical purposes;
- To process your application or nomination for a volunteer role with the Centre or membership of the Centre, determine your qualifications and fitness for the role/membership, and to provide you with support and guidance in performing your volunteer role;
- To process any donations you make;
- To process your registration for attending a Centre retreat or other event;
- To maintain the Centre's church records;
- To enable us to meet all legal and statutory obligations or requirements, and obligations to third parties;
- For administrative, accounting and management purposes, for example to maintain our accounts, manage our Volunteers' schedules and responsibilities, reimburse Volunteers as needed, and to monitor performance of groups and expenditures;
- For safeguarding purposes (including diligence and complaints handling), with the aim of ensuring that all children and adults are provided with safe environments in connection with London Centre activities;
- To deliver SRF's religious mission to our community, and to carry out any other voluntary or charitable activities for the benefit of the London Centre community.

4. Legal Bases for Processing Your Personal Data

We will process your personal data pursuant to GDPR Article 6(1)(b) if it is necessary to deliver services that you have requested, or to take steps to provide those services. Thus, we process your data when it is necessary to: (i) provide you spiritual services including Meditation and Inspirational Reading Services, Sunday School programs, monastic visits, social gatherings, spiritual support, prayers, and other services that you request, or that you expect when you become a member; (ii) to provide you with the Site and Services; (iii) to provide communications that you request from us; (iv) provide you access to or process your registration for attending a London Centre retreat or other event; or (v) to process your donations.

We process your personal data pursuant to GDPR Article 6(1)(f) because it is necessary for our legitimate interests, or the legitimate interests of a third party (such as SRF or for safeguarding you or other members). Our legitimate interests are: (1) to contact and communicate with you about our activities; (2) to determine your qualifications and fitness to serve as a Volunteer or Member of the Centre; (3) to support and assist you in fulfilling your volunteer role with London Centre or a UK meditation group, and provide the required guidance and support to help your group carry on its activities in accordance with policies and guidelines established by SRF; (4) to maintain our accounts and records, including our church records; (5) to fulfill our legal obligations, and for our administrative and management purposes; (6) to further our religious objectives; (7) to perform diligence or safeguarding tasks and respond to any complaints or problems that may arise; (8) to better understand how users access and use our Site, Services and London Centre Newsletter, to maintain, support, and improve our Site and Services, to respond to user preferences, and for research and analytical purposes.

We obtain your consent (pursuant to GDPR Article 6(1)(a)) to send you our London Centre Newsletter and other information. We also obtain your consent to share a limited amount of personal data (primarily your name and volunteer history) with SRF as part of minutes of our meetings, annual reports, or when you volunteer with us.

We process information regarding criminal convictions under GDPR Article 6(1)(c) and the UK Data Protection Act of 2018, Schedule 1, Part 3, paragraph 31, because it is necessary to carry out our legal obligations for safeguarding children; and under GDPR Article 6(1)(f) because it is necessary for our legitimate interests to safeguard children and the legitimate interests of the children and their families.

As a not-for-profit organization with a religious purpose, we may process special categories of information, including about your religious and philosophical beliefs. This processing is pursuant to GDPR Article 9(2)(d).

5. Sharing Your Personal Data

Your personal data will be treated as strictly confidential. It will only be shared with others, including third parties or other data controllers, where it is necessary for the performance of our tasks or where you first give consent. It is likely that we will need to share your data with others in the following circumstances:

- With your consent, a limited amount of personal data (primarily your name and volunteer history) is communicated to SRF.
- In limited circumstances we share information with our third-party **Service Providers**. For example, we may ask a commercial provider to send out the London Centre Newsletter on our behalf, in which event we will share your email address with that third party. We also share your payment information with third-party payment processors and financial institutions as necessary to a donation from you. We only provide our Service Providers with the information necessary for them to perform these services on our behalf, and Service Providers are prohibited from using Personal Information other than as specified by us.
- If you are a Volunteer, we may share your contact information with other member Volunteers so that they may contact you in connection with your volunteer role and for organizational and administrative purposes.
- Where you have volunteered to be a contact person for London Centre, and consented to have your contact information shared with others, we may include your contact information on our website and share it with others who are interested in participating in London Centre activities.
- If you have volunteered to work with children, we may share information with an Independent Safeguarding Authority and/or the Disclosure and Barring Service to perform required checks under the Safeguarding Vulnerable Groups Act 2006.
- We cooperate with government and law enforcement officials and private parties to enforce and comply with the law. We may disclose personal data and any other information about you to government or law enforcement officials or private parties if, in our discretion, we believe it is necessary or appropriate in order to respond to legal requests (including court orders and subpoenas), to protect the safety, property, or rights of our organization or of any third party, to prevent or stop any illegal, unethical, or legally actionable activity, or to comply with the law.
- We use a third-parties to host our Site. Your information is not disclosed to any such

third party, but data that you transmit to or through our Site will be transferred through, or reside on, computers owned by our third-party website hosting provider.

- We may disclose to third parties, certain Usage Data regarding the Site and Services. However, in such cases, your Usage Data is aggregated with the Usage Data of others and does not identify you individually and is not Personal Data.

6. How Long We Keep Your Personal Data

We will keep some records for an extended period of time, including safeguarding records, records of Youth volunteer activities, and records of Sunday School attendance. We keep gift aid records for seven years. In general, we will endeavor to keep data only for as long as we need it. This means that we may delete it when it is no longer needed.

7. Managing Your Email Preferences and Member Information

Mailing list subscribers can correct, update, delete, change their personal information and email preferences or unsubscribe online by using the “update subscription preferences” or “unsubscribe” links in the emails we send out or by emailing mailinglist@srf-london.org.uk.

Volunteers can correct, update, delete or change their personal information by emailing volunteers@srf-london.org.uk.

Members can correct, update, delete or change their personal information by emailing members@srf-london.org.uk.

You are able to opt out of receiving the London Centre Newsletter and most e-mails from us, however, you cannot opt out of receiving all e-mails from us, such as emails relating to separate services you have requested.

8. Your Rights Regarding Your Personal Data under the GDPR

You have the following rights with respect to your personal data. When exercising any of the rights listed below, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.

1. The right to access information we hold on you
 - At any point you can contact us to request access to and be provided with information on the processing of your personal information. Once we have received your request we will respond within one month.
 - There are no fees or charges for the first request but additional requests for the same data may be subject to an administrative fee.
 - However, this right may not apply where it would adversely affect the rights and freedoms of others.
2. The right to correct and update the information we hold on you
 - If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated.
3. The right to have your information erased

- If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase your data.
 - When we receive your request we will confirm whether your data has been deleted or the reason why it cannot be deleted (for example because we need it for our legitimate interests or regulatory purpose(s)).
4. The right to object to processing of your data
- You have the right to request that we stop processing your data for direct marketing (such as sending paper or electronic newsletters) or for processing based on our legitimate interests. Upon receiving the request we will contact you and let you know if we are able to comply or if we have legitimate grounds to continue to process your data.
5. The right to data portability
- To the extent that you provided personal data to us, which we process by automated means, and the legal basis for our processing of your data is: (i) consent; or (ii) that the processing is necessary for the provision of services to you or to take steps at your request to provide you services, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right may not apply where it would adversely affect the rights and freedoms of others.
6. The right to withdraw your consent to the processing at any time where the legal basis for our processing is your consent.
- You can withdraw your consent easily by email, or by post (see Contact Details below).
7. The right to restrict processing of your data
- You have the right to restrict the processing of your data in certain circumstances including: (i) if you contest its accuracy; (ii) if the processing is unlawful and you oppose the erasure; (iii) if it is no longer needed for the purposes set out in this Notice but you require it for the defense of a legal claim.
8. The right to lodge a complaint with the supervisory authority, in the Member State where you have your habitual residence, place of work, or where an alleged infringement of the GDPR has taken place.

9. Transfer of Data Abroad

We provide a limited amount of personal data (primarily your name and volunteer history) to SRF as part of minutes of our meetings, annual reports, or when you volunteer with us. In rare instances, if there is a problem, we may share additional information to seek SRF's assistance or to obtain legal advice. SRF is located in the United States. This transfer is based on GDPR Article 46(2)(c), namely Standard Contractual Clauses approved by the European Commission (available here https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en).

10. Updates to this Notice or Changes in Processing

If we wish to use your personal data for a new purpose, not covered by this Notice, then we will provide you with a new Notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever

necessary, we will seek your prior consent to the new processing.

11. Online Tracking

As explained in our [Cookie Policy](#), we use Google to provide calendar functionality on our Site. Google may set cookies and collect non-personally identifiable information (e.g. click stream information, web browser type, time and date, the pages or videos you viewed), your IP Address, and information from cookies Google set during your visits to the Site and other websites. Google may track your activity over time and different websites, and may use the information to provide advertisements about goods and services likely to be of interest to you. To learn more about these advertising practices or to opt out of this type of advertising, you can visit www.networkadvertising.org or www.aboutads.info/choices/. Our systems do not recognize browser “Do Not Track” signals, however, please also see our [Cookie Policy](#) for further information and your choices regarding cookies.

12. Use of MailChimp for our Email Newsletter

We use a company called MailChimp to distribute our London Centre email Newsletter. If you sign up for the London Centre Newsletter, your email address and record of consent are stored and processed by MailChimp in their servers in the United States. Please see the MailChimp privacy policy at <https://mailchimp.com/legal/terms/>. MailChimp is certified under the EU-US Privacy Shield, which is an agreement between the EU and the US to ensure compliance with European privacy standards in the United States.

In certain cases, clicking the links in London Centre Newsletter will direct you through MailChimp’s websites and servers in order to reach content. For example, the London Centre Newsletter contains links to our website, and links that allows newsletter recipients to retrieve newsletters online. Following these links will direct you through MailChimp’s servers. MailChimp requires this for compliance reasons and we are unable to disable this functionality. However, please be aware that MailChimp’s websites use cookies, and MailChimp and their service providers and others may collect and process personal data. We have no influence on this data collection. For more information, see the MailChimp privacy policy at <https://mailchimp.com/legal/terms/>. Our [Cookie Policy](#) contains information on controlling your cookie preferences and how to opt out of certain advertising based on personal data.

13. Security

We maintain physical, electronic, and procedural safeguards to protect the confidentiality and security of information transmitted to us. However, no data transmission over the Internet or other network can be guaranteed to be 100% secure. As a result, while we strive to protect information transmitted on or through the Site or Services, we cannot and do not guarantee the security of any information you transmit on or through the Site or Services, and you do so at your own risk.

14. Links

Our Site and Services may contain links to other websites or allow others to send you such links. A link to a third party’s website does not mean that we endorse it or that we are affiliated with it. We do not exercise control over third-party websites. You access such third-party websites or content at your own risk. You should always read the privacy policy of a third-party website before providing any information to the website.

15. Children's Privacy and Our Site and Services

The Site and Services are intended for users who are 16 years old or older. We do not knowingly collect Personal Information from children under the age of 16 in connection with the Site or Services. If we become aware that we have inadvertently received Personal Information from a child under the age of 16 in connection with the Site or Services, we will delete such information from our records.

16. Changes to this Notice

We keep this Privacy Notice under regular review and we will place any updates on our website www.srf-london.org.uk under "Privacy Notice." This Notice was last updated May 25, 2018.

17. Our Contact Details

Please contact us if you have any questions about this Notice or the information we hold about you or to exercise all relevant rights, queries or complaints at:

Mail: London Centre of Self-Realization Fellowship Church – UK, 82A Chiltern Street, London W1U 5AQ

Email: dataprotection@srf-london.org.uk.