# **BaptistryUK - Privacy Policy**

#### 1. INTRODUCTION

This privacy notice provides you with details of how we collect and process your personal data through your use of our site <a href="http://baptistryuk.com/">http://baptistryuk.com/</a>, including any information you may provide through our site when you purchase a product or service.

By providing us with your data, you warrant to us that you are over 18 years of age.

**BaptistryUK / AQB Pools Ltd** is the data controller and we are responsible for your personal data (referred to as "we", "us" or "our" in this privacy notice). 'You' etc is taken to refer to you, our church customer.

#### **Contact Details**

Our full details are:

Full name of legal entity: AQB Pools Ltd

Postal address: 89A Bradford Rd, Shipley, BD18 3BX

Telephone number: **0345 230 1381** 

Email: You may also email us by

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (<a href="https://www.ico.org.uk">www.ico.org.uk</a>). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

It is very important that the information we hold about you is accurate and up to date. You can let us know if at any time your personal information changes by email, writing or phone.

# 2. WHAT DATA DO WE COLLECT ABOUT YOU

Personal data means any information capable of identifying an individual. It does not include information on a *business*. We presume that a church (PCC, etc) are treated as a business. Where we hold details of an individual, it is solely in their capacity as the contact person for that church. Details of architects, builders, etc. are held as business entities. Nor does personal data include anonymised data.

We may process certain types of personal data about you as follows:

- Identity Data may include your first name, last name, title and job title.
- Contact Data may include your billing address, delivery/shipping address, email address and telephone numbers.
- **Financial Data** may include your bank account and payment card details. We do NOT keep or store any financial data.
- Transaction Data may include details about payments between us and other details of purchases made by you.

## **Sensitive Data**

With the obvious exception of some implied information about religious belief by you giving us a church address, we do not collect any *Sensitive Data* about you.

Sensitive data refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We do not collect any information about criminal convictions and offences.

# 3. HOW WE COLLECT YOUR PERSONAL DATA

We collect data about you through a variety of different methods including:

- **Direct interactions:** You may provide data by filling in forms either on our site or by communicating with us by post, phone, email or otherwise, including when you:
  - o order our products or services;
  - o request information, quotes or marketing to be sent to you;
  - subscribe to our publications; give details at a fair or show; enter a competition, promotion or survey; or give us feedback.
- Automated technologies or interactions: As you use our site, we may automatically collect Technical Data about your equipment, browsing actions and usage patterns. We collect this data by using cookies, server logs and similar technologies. We may also receive Technical Data about you if you visit other websites that use our cookies. Please see our cookie policy at for further details.
- Third parties or publicly available sources: We may receive personal data about you from various third parties and public sources as set out below:
- Technical Data from the following parties:
- analytics providers such as Google based outside the EU;
- search information providers such as Google based outside the EU.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Paypal based outside the EU.
- Identity and Contact Data from publicly availably sources such as Companies House and the Electoral Register based inside the EU.

## 4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when legally permitted. The most common uses of your personal data are:

- Where we need to perform the contract between us. We need a name and address to invoice, to deliver the goods and from which to collect the goods.
- As the basis of any warranty. We will need to keep evidence of a purchase of equipment if there is any guarantee with that equipment.
- We keep contact details so that future hires and sales can be made easier for the church so that they do not have to give details again.
- To let you know of any changes to, or important information affecting, the services and products we offer. For example, at busy times such as Easter, we may forewarn regular customers if hire equipment is being booked up.
- Where we need to comply with a legal or regulatory obligation. Unless legally required we do not share you data with anybody else.

Generally, we do not rely on consent as a legal ground for processing your personal data, other than in relation to sending marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by clicking here to email us.

# Purposes for processing your personal data

The table below is a description of the ways we intend to use your personal data and the legal grounds on which we will *process* such data. We have also explained what our legitimate interests are where relevant.

We may *process* your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data. Please contact us by clicking here if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including:  (a) Manage payments, fees and charges  (b) Manage delivery and collection via couriers.  (c) Collect and recover money owed to us	<ul><li>(a) Identity</li><li>(b) Contact</li><li>(c) Financial</li><li>(d) Transaction</li><li>(e) Marketing and</li><li>Communications</li></ul>	(a) Performance of a contract with you  (b) Necessary for our legitimate interests to recover debts owed to us
To manage our relationship with you which will include:  (a) Notifying you about changes to our products, services, terms or privacy policy  (b) Asking you to leave a review or take a	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests to keep our records updated and to study how customers use our products/services
survey  Less likely but not impossible - to enable	(a) Identity	(a) Performance of a contract with you
you to partake in a prize draw, competition or complete a survey or profile	(b) Contact (c) Profile	,
	(d) Usage  (e) Marketing and  Communications	and grow our business

Purpose/Activity	Type of data	Lawful basis for processing
To administer and protect our business and	(a) Identity	(a) Necessary for our legitimate interests for running
our site (including troubleshooting, data	(b) Contact	our business, provision of administration and IT
analysis, testing, system maintenance,	(c) Technical	services, network security, to prevent fraud and in the
support, reporting and hosting of data)		context of a business reorganisation or group
		restructuring exercise
		(b) Necessary to comply with a legal obligation
If we ever had the time - To deliver relevant	(a) Identity	Necessary for our legitimate interests to study how
content and advertisements to you and	(b) Contact	customers use our products/services, to develop them,
measure and understand the effectiveness	(c) Profile	to grow our business and to inform our marketing
of our advertising	(d) Usage	strategy
	(e) Marketing and	
	Communications	
	(f) Technical	
To use data analytics to improve our	(a) Technical	Necessary for our legitimate interests to define types of
website, products/services, marketing,	(b) Usage	customers for our products and services, to keep our
customer relationships and experiences		site updated and relevant, to develop our business and
		to inform our marketing strategy
To make suggestions and	(a) Identity	Necessary for our legitimate interests to develop our
recommendations to you about goods or	(b) Contact	products/services and grow our business
services that may be of interest to you	(c) Technical	
	(d) Usage	
	(e) Profile	

# Marketing communications

You will receive marketing communications from us if you have:

requested information from us or purchased goods or services from us;

and you have not opted out of receiving that marketing

We will NOT share your personal data with any third party for marketing purposes.

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us if at any time.

Where you opt out of receiving our marketing communications, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

# **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. For example, if you bought a pool from us, you may want to know about a new pool heater. If you hired from us, you may not want to have to give your contact data again and you may not be able to recall the type of pool you'd hired but you'd like it again.

Again, if you ever want to find out more about how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

### 5. **DISCLOSURES OF YOUR PERSONAL DATA**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above:

- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.

### 6. **INTERNATIONAL TRANSFERS**

Except for the fulfilment of a contact, there are no transfers of your data outside the European Economic Area (**EEA**).

Many of our third parties service providers are based outside the European Economic Area (**EEA**) so their processing of your personal data will involve a transfer of data outside the EEA. Examples include Paypal, or Google cloud storage.

Whenever we transfer your personal data out of the EEA, we do our best to ensure a similar degree of security of data by ensuring at least one of the following safeguards is implemented:

 We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission; or

- Where we use certain service providers, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe; or
- Where we use providers based in the United States, we may transfer data to them if they are part of the EU-US Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

If none of the above safeguards is available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

# 7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees who have a business need to know such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

#### 8. **DATA RETENTION**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

#### 9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

You can see more about these rights at:

https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/

If you wish to exercise any of the rights set out above, contact us

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

#### 10. THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

#### 11. COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookie policy.

#### 12. CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our Privacy policy.