

Privacy Notice - Living Church of God

We ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

Who we are

Living Church of God (International), Inc. (subsisting under the laws of North Carolina, United States) (NC SOSID: 0783290) (“**Living Church of God USA**”) and its international affiliated religious or charitable organisations (together referred to as the “**Living Church of God**”) operate under the Living Church of God name. At Living Church of God we respect your privacy and the laws governing it and are committed to protecting and safeguarding your personal information.

Personal information that is voluntarily submitted to the Living Church of God is not shared with entities outside of the Living Church of God other than appropriate service providers who assist the Living Church of God in carrying out the outreach and operational functions of the Living Church of God. Unless otherwise provided in this privacy notice, such personal information is not sold or transferred outside the control of the Living Church of God or its successors.

Controllers

The Living Church of God is made up of different legal entities and organisations, including Living Church of God USA and Living Church of God, a company incorporated in Scotland, United Kingdom (Charity No. SC028554) (“**Living Church of God UK**”).

When we mention the Living Church of God, the “Church”, “we”, “us” or “our” in this privacy notice, we are referring to the relevant entities or organisations forming part of the Living Church of God responsible for processing your data as data controllers in their own right.

Certain personal information that we collect and process is a) in the European Economic Area (“EEA”), regulated by the European Union’s General Data Protection Regulation (“GDPR”) (<http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679&from=EN>) and any legislation implementing or augmenting the GDPR in such EEA countries (“**EEA Personal Information**”), b) in the UK, the GDPR as transposed into UK national law by the operation of section 3 of the EU (Withdrawal) Act 2018 (the “**UK GDPR**”), the Data Protection Act 2018 and any other relevant data privacy legislation (“**UK Personal Information**”). Living Church of God USA and the Living Church of God UK will be joint controllers of EEA or UK Personal Information that we collect from you.

Appointed Representative in the European Economic Area (“EEA”) and the United Kingdom (“UK”)

As Living Church of God USA is based in the United States, and Living Church of God UK is based in the UK, the following companies have been appointed to act as our representative in the UK and in the EEA:

Our Representative in the UK is:

Company name: GDPR Local Ltd

Contact name: Adam Brogden

Email: contact@gdprlocal.com

UK Office Tel: + 441 772 217 800

Reporting website: <https://livingchurchofgodinternationalinclivingchurchofgod.gdprlocal.com/eu>

Reporting email: support@gdprteam.freshdesk.com

Address: GDPR Local Ltd 1st Floor Front Suite 27-29 North Street, Brighton England BN1 1EB

For more information about your rights please refer to: <https://ico.org.uk/your-data-matters/>

Our Representative in the EEA is:

Company name: INSTANT EU GDPR REPRESENTATIVE LTD

Contact name: Adam Brogden

Email: contact@gdprlocal.com

Dublin Office tel: +353 1 5549700

Reporting website: <https://livingchurchofgodinternationalinclivingchurchofgod.gdprlocal.com/eu>

Reporting email: support@gdprteam.freshdesk.com

Address: INSTANT EU GDPR REPRESENTATIVE LTD, Office 2, 12A Lower Main Street, Lucan Co. Dublin K78 X5P8Ireland

These companies will act on our behalf to resolve any issue you might have so don't hesitate to contact them with any concerns you might have.

For more information about your rights please refer to: <https://gdpr-info.eu/chapter-3/>

The personal information we collect and use

Information collected by us

Personal information or personal data, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect personal information of our adherents, volunteer workers, supporters, donors, enquirers and others who access, request, subscribe to or order our products or services or attend our events or activities (together the “**Participants**”).

We may collect, use, store and transfer different kinds of personal information about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier, marital status, family relationships with other Participants, adult/child status, title and date of birth.
- **Contact Data** includes delivery address, email address and telephone numbers.

- **Participation Data** includes details of your participation or involvement with the Living Church of God or any of its events or activities, details relating to your health, spiritual needs and sex life and other personal matters and needs and details of any criminal convictions and offences.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products or services you have ordered or subscribed to or requested from us or activities or events you have participated in or intend to participate.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us, your communication preferences and information in connection with the fulfilment of your request for our marketing information.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal information but is not considered personal information in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your magazine subscription data to calculate the percentage of subscribers who request further literature from us. However, if we combine or connect Aggregated Data with your personal information so that it can directly or indirectly identify you, we treat the combined data as personal information which will be used in accordance with this privacy notice.

We may also collect and process **Special Categories of personal information** as defined by the GDPR or the UK GDPR see <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679&from=EN> about you that you voluntarily provide us with. This personal information may include religious or philosophical beliefs, sex life, sexual orientation, information about your health and about your criminal convictions and offences. A significant amount of the personal information collected and stored by the Church in connection with the Bible-based spiritual and pastoral counselling, mentoring, advice and guidance we give to our Participants (“Counselling Services”) will be Special Categories of Personal Information.

How your personal information is collected

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity Data, Contact Data and Financial Data by filling in forms or applications or by communicating with us by post, phone, email or otherwise. This includes personal information you provide or we collect in connection with:
 - dealing with your requests/enquiries and providing you with our products or services and support;
 - the furtherance of our aims, objective (including fulfilling our mandate of Christian Evangelism and discipleship), operations and activities and events;
 - Counselling Services requested by or provided to you or our Participants;
 - becoming a volunteer worker for the Living Church of God and/or in connection with the support and our guidance we provide to such volunteer workers;
 - registration and provision of online bible courses;
 - the facilitation of one to one sessions with pastors or ministers as requested by you;
 - donations, including administering, and maintaining a record of, donations;
 - becoming a Participant and/or in connection with the support we provide to Participants;
 - marketing and provision of publications requested by or sent to you;
 - registering to attend or attending our events (including festivals, camps, etc.) or activities;
 - giving us feedback;
 - any tax and gift aid matters relating to your donations, contributions and other payments you make to us;
 - any communications we have with each other;
 - ensuring we do not send you unwanted information once you have informed us that you do not wish to receive it;
 - analysing and improving our products, services, publications, events and other activities; or
 - compliance with any legal or regulatory requirements.

How we use your personal information

We have set out below, in a table format, a description of all the ways we plan to use your personal information, and which of the legal bases we rely on to do so.

Note that we may process your personal information for more than one lawful ground depending on the specific purpose for which we are using your data. Please feel free to contact us if you have any questions on the bases on which we use your personal information.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
(a) To deal with your requests/enquiries	(a) Identity	(a) Performance of a contract with you
(b) To provide you with our products or services (including on-line bible courses) or marketing information	(b) Contact	(b) Your explicit consent (if applicable)
(c) To deal with your donations and orders	(c) Financial	(c) Necessary for our legitimate interests
(d) To organise and deal with your attendance at any event or activity	(d) Transaction	(d) In the course of our legitimate activities as a not-for-profit body with a religious aim, with appropriate safeguards in place
(e) In connection with our Counselling Services	(e) Marketing and Communications	
	(f) Participation	
	(g) Special Category	

(f) To facilitate any one to one sessions with pastors/ministers at your request		
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy notices (b) Asking you to leave a review or your feedback and process such feedback	(a) Identity (b) Contact (c) Participation (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 Participants, use of our products/services and to develop them and expand our outreach as a Church and as a ministry)
To administer and protect our aims, objectives, principles, operations, activities and Participants	(a) Identity (b) Contact (c) Participation	(a) Necessary for our legitimate interests and/or as a legitimate activity (for running our Church, ministry and operations, safeguarding, provision of administration and IT services, network security and to prevent fraud) (b) Necessary to comply with a legal or regulatory obligation (c) Your consent (if applicable)
To deliver relevant publications to you and measure or understand the effectiveness of the publications sent to you or events or activities you attend or subscribe to	(a) Identity (b) Contact (c) Marketing and Communications (d) Participation	(a) Necessary for our legitimate interests (to study how Participants use our products/services, to develop them, to expand our outreach and operations as a Church and ministry, and to inform our marketing strategy) (b) Your consent (if applicable)
To send information or make suggestions and recommendations to you about products or services or publications or events or activities that may be of interest to you	(a) Identity (b) Contact (c) Marketing and Communications (d) Profile	Necessary for our legitimate interests (to develop our products/services, publications, events, activities and expand our outreach and operations as a Church and ministry)
To comply with legal and regulatory requirements (including for the prevention and detection of crime)	(a) Identity (b) Contact (c) Profile (d) Participation	

The Church expects a high standard of conduct and behaviour from adherents, based on God's laws (as contained in the Holy Bible and understood and taught by the religious hierarchy of the Church). If the Church discovers through the Counselling Services or otherwise that you are engaged or have engaged in behavior contrary to God's laws, the Church may at its discretion use the Personal Information it holds about you to modify, suspend, or terminate, the relationship between you and the Church.

Any bank account or payment card details that you provide to us for billing and related purposes is shared with Authorize.net, a United States based payment services provider. By providing your Contact Data and Financial Data to us, you consent to us sharing such data with Authorize.net who will process and store this information.

Marketing

We may use your Identity Data, Contact Data and Participation Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which publications, products, services, events, activities and offers may be relevant for you (we call this marketing).

You may receive marketing communications (including being added as a subscriber to our Tomorrow's World Magazine and/or our News & Prophecy newsletter) from us if you are a Participant or subscribed to, requested or ordered products or services or publications from us or if you provided us with your details when you made a donation or registered for an event or activity and, in each case, you have not opted out of receiving that *marketing*.

Who we share your personal information with

We may have to share your personal information with the parties set out below (who may be based outside the EEA or UK).

- Organisations which form part of in the Living Church of God, in particular in connection with activities undertaken jointly or in common with such organisations and/or provide IT and system administration services and undertake management reporting.
- In connection with the Counselling Services, your personal information may be shared and disclosed as follows:
 - To Church ministers and authorised Church personnel other than the minister to whom you disclosed it;
 - To Church ministers and authorised Church personnel outside the EEA and the UK;
 - Once Personal Information has been transferred outside the EEA and the UK, it may also be subject to onward transfer to Church ministers and authorized Church personnel in other non-EEA and the UK countries in which the Church operates; and
 - In exceptional cases, we may be required for ethical or legal reasons to pass Personal Information to relevant authorities, for example, if we have reason to believe that someone is at serious risk of harm, or to prevent a miscarriage of justice. We will discuss any proposed disclosure to anyone outside the Church with you unless we believe that to do so could increase the level of risk to you or to someone else.
- Third parties such as:

- Service providers who provide IT and system administration services, billing and/or payment services, email or identity verification services, postal services or e-communication services.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- IRS, HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer, or merge parts of our administration or operations or our assets.

We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.

We will share personal information with law enforcement or other authorities if required by applicable law.

Whether information has to be provided by you, and if so why

Where we need to collect personal information by law, or under the terms of a contract we have with you, or when we have to deal with your request or enquiries, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you or deal with your request or enquiries (for example, to provide you with products or services) or provide you with any support you are seeking from us. In this case, we may have to cancel the contract or not provide you with a product or service or support you have requested or subscribed to, ordered or need from us but we will notify you if this is the case at the time

How long your personal information will be kept

We will only retain your personal information while you are a Participant or for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, any legitimate administrative or operational purposes, your requirements, or reporting requirements. In determining data retention periods, we take into consideration local laws, contractual obligations, our reasonable business requirements and your expectations and requirements.

In relation to the Counselling Services, all records will be stored securely and are only accessed as necessary by authorised Church personnel.

In view of the nature of our organisations and their activities, we endeavour to maintain a lifelong relationship with our Participants. Accordingly, unless you object to our retention of your personal information, we may retain a Participant's personal information for a period of up to 4 years following our last communication with such Participant or such other longer period necessary to satisfy any legal, accounting or any legitimate administrative or operational purposes.

If you request that we stop sending you marketing materials, we will continue to keep a record of your contact details and appropriate information to enable us to comply with your request not to be contacted by us.

When it is no longer necessary to retain your personal information, we will securely delete or in some circumstances we may anonymise your personal Information (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.

Transfer of your information out of the EEA or UK (as applicable)

Personal information that is voluntarily provided to us, may be maintained or accessed in servers or files located in the United States, which the European Commission has not deemed to provide "adequate" privacy safeguards. If you are in the EEA, it may also be maintained or accessed in servers or files located in the UK, which the European Commission has also not deemed to provide "adequate" privacy safeguards. If you do not consent to having your personal information processed and stored in the United States or the UK, please do not provide it to the Living Church of God. By voluntarily providing your personal information to any organisation forming part of the Living Church of God, you consent to its transfer, processing and storage in the United States and/or the UK.

Organisations forming part of the Living Church of God based outside the United States (including those based in the United Kingdom and the EEA ("**Regional Offices**")) may share your personal information that they collect with Living Church of God USA in connection with support services provided by Living Church of God USA on behalf of such Regional Offices. Regional Offices may also share your personal information with each other. This may involve transferring your data outside the EEA or UK (as applicable).

Many of our third party service providers are based outside the EEA or UK so their processing of your personal information will involve a transfer of data outside the EEA or UK (as applicable).

Whenever we transfer your personal information out of the EEA or UK (as applicable), we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal information to countries that have been deemed to provide an adequate level of protection for Personal information by the European Commission.
- Where we use certain providers, we may use specific standard contractual clauses approved by the European Commission or the UK Parliament which give EEA or UK Personal Information the same protection it has in the EEA or the UK (as applicable).
- Please contact us at privacy@lcg.org if you want further information on the specific mechanism used by us when transferring your EEA or UK Personal Information out of the EEA or UK (as applicable).

Your rights

Under the GDPR and the UK GDPR you have a number of important rights free of charge. In summary, those may include rights to:

- access to your personal information and to certain other supplementary information that this privacy notice is already designed to address.
- require us to correct any mistakes in your personal information which we hold.
- require the erasure of personal information concerning you in certain situations.

- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations.
- object at any time to processing of personal information concerning you for direct marketing.
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you.
- object in certain other situations to our continued processing of your personal information.
- otherwise restrict our processing of your personal information in certain circumstances.

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on individual's rights under the GDPR (<http://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>) and the UK GDPR.

If you would like to exercise any of those rights, please email us at privacy@lcg.org

If you would like to unsubscribe from any online or email publications you can also click on the 'unsubscribe' button at the bottom of the email publication. It may take up to 20 days for this to take place.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

How to complain

We hope that we can resolve any query or concern you raise about our use of your information.

The GDPR and the UK GDPR (<http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679&from=EN>), also give you right to lodge a complaint with a supervisory authority, in particular in the European Union (or EEA) state where you work, normally live or where any alleged infringement of data protection laws occurred, or the UK, if applicable. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

How to contact us

Please contact us if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact us, please send an email to privacy@lcg.org, call us on +44 (0) 1536 520042 or write to:

Co-Data Privacy Manager(s)
Living Church of God (International), Inc.
P.O. Box 3810
Charlotte, NC 28227-7705