



## OCCA Privacy Policy

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This document provides you with information about how we handle your personal data. If you are aged 16 or under, please get your parent/guardian's permission before you provide any personal information to us.

### 1. INTRODUCTION

OCCA's main aims are that we desire the fulfilment of the great commission of Jesus Christ. (Matthew 28:18-20) and we aim to accomplish this by commending the gospel truth with compassion and integrity. OCCA's main activities are:

- **Persuasive Evangelism through** honest answers to honest questions; sharing evidence for Christ in the public square; and engaging with today's challenging issues.
- **Equipping and Training by** partnering with the church; developing believers; and through intellectual integrity
- **Reflecting Christian Character by** reaching and challenging those who shape the ideas of a culture with the credibility of the Gospel of Jesus Christ. Distinctive in its strong evangelistic and apologetic foundation, the ministry is intended to touch both the heart and the intellect of the thinkers and influencers of society.

### 2. WHO WE ARE

OCCA The Oxford Centre for Christian Apologetics is operated by OCCA House Limited, a charitable company limited by guarantee, registered in England. Company No. 3449676. Charity No. 1067314. Our registered office is at 27 Beaumont Street, Oxford, OX1 2NR. For the purposes of this policy, 'us', 'we' and 'our' refer to the OCCA The Oxford Centre for Christian Apologetics.

### **3. WHAT INFORMATION DO WE COLLECT?**

#### **Direct interaction with us**

We collect personal information each time you deal with us. For example, if you donate to us, purchase resources, sign up for an event, provide comments or fill in our 'contact us' form, or otherwise provide your personal details, we collect the information you provide.

#### **From website interaction with us**

We collect data such as IP addresses, details of pages visited, and files downloaded. Website usage information is collected using cookies (see the section on cookies below). We will collect information from the OCCA website and sites managed by OCCA.

#### **Indirectly from third parties**

We collect information from third parties such as ticket suppliers. You may wish to check their privacy policy to find out more information on how they will process your data.

#### **Where you give your permission to other organisations**

We may collect information that you make available on, for example, Twitter, Facebook, YouTube, TikTok, or Instagram. You may wish to check their privacy policy to find out more information on how they will process your data.

#### **Sensitive data**

We do not seek to gather sensitive information. However, where you provide sensitive information, we will keep a record of this. Where you provide personal or sensitive personal data, such as dietary, mobility requirements or health information, for our events, we will store, process and disclose only to necessary parties the personal information we collect to ensure your well-being at the event.

### **4. WHAT DO WE DO WITH IT?**

We may use the personal data we collect to:

- Provide you with information, products or services that you request from OCCA or which we feel may interest you, where we are legally entitled to do so;

- Ask for financial and non-financial support (such as prayer);
- Process donations you give us, including gift aid;
- Provide information or packs, for example Church packs you have requested;
- Provide a personalised service, such as customised emails;
- Keep records of your relationship with us e.g. questions you have asked or complaints you have made;
- Ensure that content from our websites is presented in the most effective manner;
- Authenticate you when you register;
- Notify you of changes to our service.

### **Basis of processing your data**

The legal basis on which we collect and process the personal data described above depends on the personal information concerned and the specific context in which we collect it. However, we will only use your personal information where we:

- Have your consent to do so;
- Need to process your personal information for our legitimate interests and only where our legitimate interests are not overridden by your data protection interests or fundamental rights and freedoms; or
- Have a legal obligation to collect personal information from you.

We process your personal data based on the consent you provide us with. You are free to change your preferences at any time by contacting us by telephone, post or email as shown in the section ‘Your choices and telling us when things change’ below.

**Legitimate interest:** We may also contact you by email, post or telephone where we have a legitimate interest to do so. For example, where you have previously donated to OCCA we may continue to send you information about the work your donation is making possible or other work we may wish to do. Where you have previously asked us not to contact you in this way we will continue to respect your preferences. If you think there is a problem with the way we are handling your data, please let us know via the contact mechanisms described at the end of this policy. If you are not satisfied with our response, you can direct any complaints to the Information Commissioner’s Office.

### **Applying for a job or volunteering with us**

Where you provide personal data and sensitive information when applying for a job with us, such as the information on your CV, we will process, store and disclose the personal data we collect to:

- Support the recruitment process;
- Enable you to submit your CV, apply online for jobs and to subscribe for alerts to types of job that interest you;
- Answer any questions you may have;
- Use third parties to provide services such as references, qualifications, criminal referencing, checking services, verification of information you have provided, health screening and psychometric evaluation or skills tests;
- Provide anonymised data to monitor compliance with our equal opportunities policy.

## **5. HOW AND WHERE WE STORE YOUR INFORMATION**

### **How long?**

We will keep your personal information only for as long as we consider it necessary to carry out each activity. We follow statutory guidance with regards to data retention. We take account of legal obligations, accounting and tax issues as well as considering what would be reasonable for the activity concerned. For example, we will retain details of Gift Aid for 7 years. If you have any questions relating to data retention, please email: [office@theocca.org](mailto:office@theocca.org).

### **Security**

OCCA will take all steps reasonably necessary including policies, procedures and security features to ensure that your data is treated securely and is protected from unauthorised and unlawful access and/or use, and in accordance with this privacy notice. For example, our internet network uses industry-standard password protection and is routinely monitored. Access to your personal data is protected by industry-standard mechanisms, such as multi-factor authentication, firewalls, and access to sensitive data contains additional controls. We may make limited use from time to time of external companies to process personal data on our behalf. When we do use external companies, we remain responsible for the storing and processing of your personal data.

### **Credit / debit card security**

If you use your debit or credit card to donate to us, purchase a resource or pay for an event, whether online, over the phone or by mail, we will process your information securely in accordance with the Payment Card Industry Data Security Standard (PCI-DSS). Only necessary credit or debit card details (such as reference tokens for recurring donations) remain stored in our systems and

websites, while complete card numbers remain stored with payment processors, such as Stripe (a Level 1 PCI-DSS certified service provider). We hold bank account details for collecting standing orders in accordance with banking regulations.

## **6. WHEN WE SHARE YOUR INFORMATION**

We do not share or swap your information with any other charities or organisations, other than third parties who carry out tasks on our behalf, such as such as sending mail outs or processing donations. These agents are bound by contract to protect your data and we remain responsible for their actions.

### **Legal duty**

We may need to pass on information if required by law or by a regulatory body. For example, a Gift Aid audit by the HMRC, or if asked for details by a law enforcement agency.

## **7. COOKIES**

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns and does not identify any individual. For the same reason, we may obtain information about your general internet usage by using cookie files which are stored on your computer. Cookies contain information that is transferred to your computer's memory. You may refuse to accept cookies by activating the relevant setting on your browser. However, if you select this setting, you may be unable to access certain parts of the Site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you visit the Site.

### **OCCA's use of cookies on our website**

The cookie data that we collect we may use to:

- customise the content on our website and to help to understand visitor's current and future needs
- process any requests, applications, or transactions you may make
- aid internal administration and analysis

### **Third-party cookies**

OCCA works with a number of third-party suppliers who set cookies on our website to enable them to provide us with services. These are mainly used for reporting and advertising purposes, so we can improve the way we communicate. We use websites such as YouTube and Vimeo to embed videos and you may be sent cookies from these websites. We do not control the setting of these cookies, so we suggest you check the third-party website for more information about their cookies and how to manage them. OCCA also uses third party suppliers such as Facebook, Twitter, and Google Analytics and these providers may use cookies. They may also use tracking pixels, which are commonly found in advertising to track the effectiveness of adverts. As some of these services may be based outside of the UK and the European Union, they may not fall under the jurisdiction of UK courts. If you are concerned about this, you can change your cookie settings (see above).

## 8. YOUR CHOICES AND TELLING US WHEN THINGS CHANGE

Data protection laws grant you, as a Data Subject, certain 'information rights', which are summarised below:

- **Right of access** – You have the right to obtain a copy of information we hold about you.
- **Right of rectification or erasure** – If you feel that any data that we hold about you is inaccurate, you have the right to ask us to correct or rectify it. You also have a right to ask us to erase information about you where you can demonstrate that the data we hold is no longer needed by us, or if you withdraw the consent upon which our processing is based, or if you feel that we are unlawfully processing your data. Please note that we may be entitled to retain your personal data despite your request, for example if we are under a separate legal obligation to retain it. Your right of rectification and erasure extends to anyone we have disclosed your personal information to and we will take all reasonable steps to inform those with whom we have shared their data about your request for erasure.
- **Right to restriction of processing** – You have a right to request that we refrain from processing your data where you contest its accuracy, or the processing is unlawful and you have opposed its erasure, or where we do not need to hold your data any longer but you need us to in order to establish, exercise or defend any legal claims, or we are in dispute about the legality of our processing your personal data.
- **Right to Portability** – You have a right to receive any personal data that you have provided to us in order to transfer it onto another data controller where the processing is based on consent and is carried out by automated means. This is called a data portability request.

- **Right to Object** – You have a right to object to our processing your personal data where the basis of the processing is our legitimate interests including but not limited to direct marketing and profiling.
- **Right to Withdraw Consent** – You have the right to withdraw your consent for the processing of your personal data where the processing is based on consent.
- **Right of Complaint** – You also have the right to lodge a complaint about any aspect of how we are handling your data with the *UK Information Commissioner's Office*, which can be contacted at [www.ico.org.uk](http://www.ico.org.uk).
- **Right to Opt-out of Marketing Communications** – You have the right to opt-out of marketing communications we send to you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing emails we send you. To opt out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided below.

For all of the above requests, you will need to write to us at the address given below. We will respond within 30 days of receiving your letter.

## 9. CHANGES TO THE OCCA's PRIVACY & SECURITY POLICY

### Changes to this Policy

We may amend this policy from time to time to take account of changes to our processes or changes to data protection or other legislation. If we make any significant changes to this policy, we will show this clearly on our website, in any of our publications or by writing to you directly. By continuing to use our website, you will be deemed to have accepted these changes.

## 10. FEEDBACK

We welcome feedback: +44 (0) 1865 302900 | [office@theoCCA.org](mailto:office@theoCCA.org) | 27 Beaumont Street, Oxford OX1 2NR