

Privacy Notice

The National Spiritual Assembly of the Bahá'ís is a registered charity in the UK, (with registered charity number 250851, Scottish charity number SC041673 and registered company number 355737) and is referred to in this privacy declaration as the “Assembly”.

In this Privacy Notice, references to “we” or “us” are to the Assembly and references to the UK GDPR are to the General Data Protection Regulation (EU 2016/679) as it is implemented into UK law.

The Assembly is the controller of your personal data and aims to ensure that it processes your personal data and others, with a high degree of integrity and confidentiality and in accordance with data protection law. The Assembly will endeavour to ensure your personal data is accurate, kept only for as long as it is required, and stored securely. Training is provided to all staff and volunteers who store and/or use personal data and they are required to sign the data protection agreement. This Privacy Notice will be reviewed on a regular basis and posted in official publications and websites.

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1. Contact details

For more details regarding personal data and the Assembly's privacy policy, please contact:

Post: Data Protection Office, 27 Rutland Gate, London, SW7 1PD

Email: privacyofficer@bahai.org.uk

Phone: 020 7584 2566

Web: <https://bahai.org.uk/wp-content/uploads/2018/06/Privacy-Declaration.pdf>

2. Your personal data and the purposes for which it is used

The Assembly may record and process your personal data when you:

- register as a Bahá'í;
- transfer as a Bahá'í from another country to the United Kingdom;
- sign up to receive our newsletters, updates or event invites;
- or one of your family members provide us with your personal data in connection with any spiritual, pastoral or other support that we are providing to you or your family members as members of the Bahá'í community;
- are an active participant in Bahá'í activities at local and/or national level, for instance when you are a [participant in local Bahá'í meetings and groups];
- contact us directly to make an enquiry (including to request information) or to make a complaint;

Such personal data may include:

- Personal details such as full name, age, home address, country of origin, phone number, email address and relationship status;
- Information that you provide to us about your faith;
- Bank account details;
- Data about participating in Bahá'í educational programs;
- Details of any identification documents you have provided to us for verification purposes;
- Information about your own personal circumstances in relation to which the Assembly is providing you with spiritual or other support;
- Information about your participation in meetings and/ or membership of committees of the Assembly;
- The Assembly will only collect and process special category personal data about you if there is a valid reason for doing so and where the law allows us to. This includes personal data about your health, ethnicity, religion or political opinions.

The purposes for which this data is processed include:

- Community administration including managing membership, making arrangements in connection with local meetings, record keeping and communication;
- Managing donations to the Fund and Huqúq'u'lláh.
- Managing electoral processes and the transitions from child to youth and

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- adulthood;
- Offering education and resource development courses;
- Offering pastoral care and support to you and your family members;
- Protecting and propagating the principles and practices of the Faith;
- To satisfy legal obligations which are binding on us

If the Assembly is your employer, additional information may be collected and processed concerning:

- Certification and Work eligibility;
- Medical records.

These details collected when you sign a contract with the Assembly, are processed by us for the purposes of complying with our obligations as your employer.

Where required, the Assembly may also process data concerning physical and mental health of eligible members of the community for safety, security and pastoral care purposes. In such a case, your consent may be sought to record this data if appropriate or we may seek to rely on another basis in law which permits us to process your sensitive or special category data.

Your personal data is not stored for the purpose of automated profiling, as defined in the UK GDPR. It is stored as part of the filing system internal to the Assembly and its institutions.

3. Lawful bases for processing

Under the UK GDPR, we are required to rely on one or more lawful grounds to collect and use the personal data relating to you that we have outlined above. We consider the grounds listed below to be relevant:

As a faith-based, not-for-profit organisation, the Assembly's processes your personal data on the basis of:

- its '**legitimate interests**' - We rely on this basis where applicable law allows us to collect and use personal data for our legitimate interests (for instance for managing the day to day affairs of the Bahá'í community) and the use of your personal data is fair, balanced and does not unduly impact your rights.
- **contract**, - We may rely on this basis where it is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to you entering into a contract.
- **legal obligation** We rely on this basis where processing is necessary for compliance with a legal obligation to which we are subject.
- '**consent**' We may obtain your consent to use your personal data in certain circumstances e.g. to send you direct marketing messages by email or where you have voluntarily provided us with your sensitive (or special category data) information. We will ensure that when we obtain your consent you are free both to give it and to decline to give it. Additionally, you may always withdraw your consent at any time without any further detriment to you.

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Where we are relying on consent as our lawful basis for processing personal data relating to a child under the age of [16], we will seek consent on behalf of the child from a parent or someone with parental responsibility for the child, unless there are reasons why seeking the consent of a parent or individual with parental responsibility is not in the best interests of the child.

‘Special categories of personal data’ (such as information about your health or religious beliefs) may be processed in the course of our legitimate activities. This is because the Assembly is a not-for-profit body with a religious aim, relating to you as a member, former member, or person with whom it has regular contact.

4. Sharing your personal data with others

The Assembly may share your personal data with Local Spiritual Assemblies, groups, committees and agencies of the Assembly, individuals and organisations working with or on behalf of the Assembly (e.g. Regional Councils, the Training Institute Board, Area Teaching Committees, Coordinators, Auxiliary Board Members etc.), as well as international institutions of the Faith. The Assembly may engage in this sharing, for the purpose of carrying out the work of the Assembly, complying with its legal obligations and ensuring that we are able to offer support and guidance to all of our members. Your personal data may also be shared with relevant public bodies where this is necessary in line with our pastoral obligations, and with our solicitors and professional advisers as necessary.

- When sharing your personal data, we take the following steps to enhance the protection of your personal data:
- Your data is password protected when transmitted via email or other channels
- The personal data about you that we share is limited to what is needed to carry out our specific tasks and duties
- When sharing your personal data with data processors (i.e. organisations which process your personal data on our behalf) we enter into data processing agreements which comply with the requirements of the UK GDPR including by requiring those processors to securely delete data once it is no longer required for the purposes for which we shared it with that processor.
- If you are appointed to a specific role or as a member of a committee or agency within the Bahá’í community, your details may be published (e.g.: in a NEWS email, annual reports or online) or shared directly so that members and other relevant individuals, institutions or agencies of the Faith can contact you. This will cease when you no longer carry out that role.
It may be necessary to share your details within the Bahá’í community in UK, as follows:
- To comply with safeguarding policy particularly with children or vulnerable adults a volunteer’s personal data may be shared with organisers of events or groups and when this role within the Bahá’í community means you need to receive specific information related to the role from a relevant third party.
- To process your Gift Aid tax refunds through the Office of Treasurer or the Trustees of the Huqúq’u’lláh
- Photographs and/or videos taken at Bahá’í events may be posted in a NEWS email, on a website www.bahai.org.uk and/or other online platforms and social media.

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- If you donate money using the UK Gift Aid scheme, details of those gifts are sent to HMRC.

Finally the Assembly reserves the right to disclose your personal data to third parties:

- in the event that we acquire or dispose of any business or assets, in which case we will disclose your personal data to the prospective transferor or transferee of such business or assets;
- if substantially all of our assets are acquired by a third party, personal data held by us may be one of the transferred assets;
- for auditing purposes;
- if we are under any legal or regulatory obligation to do so e.g. to comply with legal process or requests from government authorities;
- to permit us to pursue available remedies or limit the damages that we may sustain;
- for the purposes of arranging insurance or for risk management purposes;
- in connection with any legal proceedings or prospective legal proceedings, in order to establish, exercise or defend our or a third party's legal rights; and/ or
- in order to protect your vital interests or the vital interests of another individual.

5. International transfers of your personal data

The Assembly may transfer your personal data outside of the UK. This may be the case, for example, when you change your country of residence or if the Assembly has been asked by another National Assembly to provide a reference for your volunteer service application.

Where your personal data is transferred, stored, and/or otherwise processed outside the UK in a country which does not offer an equivalent standard of protection to the UK, we will take all reasonable steps necessary to ensure that the recipient implements appropriate safeguards (such as relying on standard contractual clauses approved) designed to protect your personal data.

When you make payments in respect of Huqúq'u'lláh (the Right of God), your personal details and amounts paid will be shared with the Bahá'í World Centre in Israel. Israel is considered as an 'adequate' country by the UK and therefore we are permitted to transfer personal data to the Bahá'í World Centre without requiring the Centre to implement appropriate safeguards such as entering into standard contractual clauses with us.

6. Storage, retaining and deleting personal data

The Assembly uses Microsoft Office 365 cloud services for digital files, which have integrated appropriate security measures to keep your data safe, including instances where their servers are located outside of the UK.

To prevent unauthorised disclosure of your information, the Assembly's paper-based records are kept in a locked cabinet/briefcase/safe when not in use. Electronic and portable memory devices are protected by passwords or equivalent security measures.

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Membership software and digital documents containing personal data are either encrypted or password-protected and are only accessible to selected and adequately trained staff under contract.

The Assembly will keep your personal data for as long as necessary:

- (a) to comply with any statutory or regulatory requirements we are subject to under applicable law;
- (b) to fulfil the purposes for which the personal data was collected; and
- (c) to defend our or a third party's legal rights.

Other than:

- permanent records (like membership and marriage registers, or the minutes of meetings of Local and National Institutions); or
- details that need to be kept for compliance with a legal obligation to which the Assembly is subject, (such as safeguarding notes or Gift Aid declarations); or
- records that the Assembly processes in order to protect your vital interests or the vital interests of another natural person.

the Assembly will securely destroy any personal data relating to you that is no longer required.

7. Your principal rights

Please note that we will honour your requests to exercise your rights to the extent possible and required under applicable law. Certain of these rights may only be available to you if you are located in the UK or the EU when you access our website or otherwise engage with us.

You have the right to:

- (a) Ask us for confirmation of what personal data we hold about you, and to request a copy of that information (**Right of Access**). If we are satisfied that you have a legal entitlement to see this personal data, and we are able to confirm your identity, we will provide you with this personal data.
- (b) Withdraw your consent at any time if we have relied on consent as the lawful ground to use your personal data.
- (c) Request that we delete the personal data we hold about you, as far as we are legally required to do so.
- (d) Ask that we correct any personal data that we hold about you which you believe to be inaccurate.
- (e) Object to the processing of your personal data where we: (i) process on the basis of the legitimate interest's ground; (ii) use the personal data for direct marketing; or (iii) use the personal data for statistical purposes.
- (f) Ask for the provision of your personal data in a machine-readable format to either yourself or a third party, provided that the personal data in question has been provided to us by you, and is being processed by us: (i) in reliance on your consent; or (ii) because it is necessary for the performance of a contract to which

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you are party; and in either instance, we are processing it using automated means.

- (g) Ask for processing of your personal data to be restricted if there is disagreement about its accuracy or legitimate use.

To exercise these rights, contact us by post via:

Data Privacy Office
27 Rutland Gate
London SW7 1PD

or e-mail: accessrequest@bahai.org.uk.

Please be aware that there may be limits on the Assembly's obligation to allow you to exercise these rights, such as where we are legally prevented from doing so or where exemptions apply under data protection legislation.

Additionally, you have the right to lodge a complaint against us. To do so, contact the supervisory authority in your country of residence. In the UK, this is the Information Commissioner's Office at www.ico.org.uk/concerns.

8. Exercising your Right of Access

In order to locate the information, you are requesting and to ensure proof of your identity, please send:

- Your name (including any names by which you used to be known) and Date of Birth
- Address (incl postcode), e-mail address(es), telephone number(s)
- [Two pieces of identification that between them clearly show your name, date of birth and current address (e.g., passport, photocard driving license, birth certificate, recent bank statement/utility bill)]

We will only use this information to verify your identity in order to process your request.

In response, and usually within one month (unless your request is complex), you will be sent:

- The personal data we hold on record for you
- The types of processing done with your data
- The people/groups with whom your data will have been shared (or will be in the future)
- The Assembly's intentions regarding how long your data might be stored
- OR an explanation of why it is lawful for the Assembly not to provide some or all of your personal data

This service will not be charged for unless you make manifestly unfounded or excessive requests.

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9. Amendments

This policy may be updated from time to time by publishing a new version on our website. If we update this Privacy Declaration in a way that significantly changes how we use your personal data, we will bring these changes to your attention where reasonably possible. Otherwise, we recommend that you periodically review this Privacy Declaration to be aware of any other revisions.

10. Definitions

Controller: means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data;

Processor: means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

processing: means any operation or set of operations which is performed on personal data or on sets of personal data such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

personal data: ‘personal data’ means any information relating to an identified or identifiable natural person (‘data subject’)