

# PRIVACY POLICY

## INTRODUCTION

Japan Christian Link is a UK-based Christian charity which exists to help make a significant difference in the progress of the gospel among the Japanese people over the first half of this century.

We will seek to do this through educating, encouraging and equipping the Body of Christ so that, more and more, through an expanding network of relationships, the good news of Jesus Christ will be proclaimed clearly, and disciples of Jesus Christ multiplied, among the Japanese people, for his glory. (Matthew 28:19-20)

More details about our Vision, Aims and Values, as well as our History are available from our website:

[Vision, Aims and Values](#)

[History](#)

Japan Christian Link seeks to build and expanding network of relationships with all who seek to proclaim the good news of Jesus Christ to Japanese people. We value everyone who engages with us by whatever means and we want to protect your privacy and to make sure the personal data you provide to us is kept safe.

This policy explains how we collect data, how we use and store this information and what it means for you. We also have specific Terms and Conditions for the use of our website, which you should read as well.

We treat all our supporters in line with our beliefs and we welcome any feedback on any of our actions. Just call us on 01732 455453 or email [info@jclglobal.org](mailto:info@jclglobal.org)

## WHO WE ARE

Japan Christian Link is a Christian charity registered in England and Wales (number 1164572) and our contact address is P.O. Box 68, Sevenoaks, Kent TN13 2ZY.

## WHICH INFORMATION DO WE COLLECT?

We collect information in different ways, depending how you contacted us. Please refer to the relevant paragraph(s) below:

### **If you contacted us directly, in person:**

We collect personal information each time you deal with us, for example when you make a donation, place an order with our online bookshop, request materials or information, sign up for an event, provide comments, complete surveys or otherwise provide your personal details.

### **If you contacted us through our website (e.g. through placing an order at our online bookshop or completing information in our Contact Us page):**

We collect non-personal data such as IP addresses. We may also collect details of pages visited and files downloaded. Website usage information may be collected using cookies, see the section on Cookies below.

### **If you contacted us indirectly (e.g. through one of our Mission Partners or service providers):**

We collect information from other parties such as JCL Network or Mission Partners, others who may have referred you to us or fundraising sites like Just Giving, where you have agreed to support Japan Christian Link and have given your consent. You may wish to check their privacy policies to find out more information on how they will process your data.

### **If you give your permission to other organisations:**

We may collect information that you make available on, for example, Twitter, Facebook, LinkedIn or similar organisations. You may wish to check their privacy policies to find out more information on how they will process your data.

### **From publicly available data**

We may collect information from Companies House, the Charity Commission and information published in articles, newspapers or blogs.

### **Sensitive data**

Where you provide the information, we may collect sensitive personal data, including, but not limited to, your religious beliefs or your physical or mental health.

## **WHAT DO WE DO WITH THIS INFORMATION?**

### **Processing of requests / donations / calls to action / applications to attend events**

We may use the personal data we collect to:

- Keep you up to date on news and stories about our mission and work;
- Ask for financial and non-financial support, such as volunteering or prayer;
- Process donations you give us, or to support your fundraising for us, including gift aid;
- Provide information you have requested;
- Provide a personalised service, such as customised website content or personalised emails;
- Keep records of your relationship with us e.g. questions you have asked or complaints you have made;
- Classify supporters by geographic location;
- Analyse the personal information we collect about you and use publicly available information to aid our understanding of our supporters, profile supporters into categories and to help provide the right information at the right time to the right supporters; and
- Conduct market research to aid our understanding of our supporters and their views.

We may use publicly available information such as newspaper articles, or information you have given permission to other organisations to share such as LinkedIn or Facebook, to identify supporters and non-supporters, including trustees, who have expressed an interest in giving major gifts or having a public profile with charities like Japan Christian Link.

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

- **Consent:** If you are a new supporter contacting us for the first time on or after 30<sup>th</sup> April 2018 we will process your personal data on the basis of 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 “You are in control - How to tell us when things change” below.
- **Legitimate interest:** Contacting you; If you are an existing supporter as at 30<sup>th</sup> April 2018 we may continue to contact you by email **where you have previously given us your consent**. We may also contact you by post or telephone where we have a legitimate interest to do so. For example, where you have previously made a donation to Japan Christian Link 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 contact preferences. You can change your preferences

at any time or object to us processing your data by contacting us by telephone, post or email as shown in the section “You are in control - How to tell us when things change” below.

- **Legitimate interest:** Contacting the right supporters at the right time; When you make a donation, a series of donations, express an interest in our work, or show a potential to give to our work, we will rely on our legitimate interest in order to collect additional information as noted above in ‘Processing of requests / donations / calls to action’. This helps us to identify those supporters who would benefit from a discussion with us and to ensure we use our supporters’ money in the most effective ways.

### **Applying to become a partner, for a job or to volunteer with us**

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

- Support the appointment / recruitment process;
- Enable you to submit your CV, apply for jobs and to subscribe for alerts about job types of interest to you (where available);
- Answer any questions you may have;
- Use third parties to provide services such as references, verification of qualifications, criminal referencing, checking services, verification of information you have provided, health screening and psychometric evaluation or skills tests.

Where you provide personal or sensitive personal data, such as dietary, mobility requirements or health information, to attend one of our events, volunteer or travel on a trip with us we will store, process and disclose the personal information we collect to:

- Deliver the event / volunteering opportunity, including the disclosure of sensitive data, such as medical information, to our partner(s) where necessary to deliver a safe trip or event for all involved;
- Provide information including fundraising materials as we promised in the ‘ What do we do with this information?’ section or the equivalent which is applicable to the volunteer role;
- Administer these trips / events / opportunities to serve;
- Monitor the quality of the volunteering opportunity or trip provided;
- Answer any questions or feedback you may have.

## **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 have a data retention policy to implement this. We take account of legal obligations and accounting and tax considerations as well as considering what would be reasonable for the activity concerned.

For example we will retain details of donations for 7 years to meet tax and accounting requirements, but we will only hold sensitive medical personal information provided to participate in an overseas trip until the trip is completed.

Legacy income is an important source of income for our beneficiaries. We may keep data you provide indefinitely to carry out the administration of legacies and to communicate with the families of those leaving us legacies.

If you have any questions about our Data Retention Policy please contact us by writing to:

Director of Operations  
Japan Christian Link

P.O. Box 68  
Sevenoaks  
Kent TN13 2ZY

or by email to: [info@jclglobal.org](mailto:info@jclglobal.org)

### **Security**

We ensure that we have in place appropriate technical controls to protect any personal data you provide. For example, we ensure that any online forms are encrypted and our network is protected.

We ensure that access to personal data is restricted only to those staff members or volunteers whose job roles require such access and that suitable training is provided for these staff members and volunteers.

We may make limited use from time to time of external companies to collect or process personal data on our behalf. When we do so, we carry out checks on these companies, put in place contracts to make sure our requirements are clear and carry out periodic reviews. When we do use external companies, we remain responsible for the storing and processing of your personal data.

However, we need to remind you that despite all our efforts, the internet cannot be guaranteed to be 100% secure, and that you submit data at your own risk.

### **Payment security**

If you use your debit or credit card to donate to us or purchase something online we use PayPal as our service provider. This allows us to offer their security features, as well as payment from a PayPal account. More detail about the security of payments made through PayPal can be accessed through their website by clicking [here](#).

Japan Christian Link also offers the ability to make payments directly to us through our UK bank account with Barclays Bank and also to our currency agent, Currencies Direct. If you make a payment to Japan Christian Link through either of these parties you do so at your risk through the payment method which you select.

We currently do not accept debit or credit card payments by telephone or by post.

We hold bank account details for the purpose of administering any bank Standing Orders which you may send to us. We may also hold these details for collecting direct debits in accordance with direct debit mandate rules.

### **Where we store your personal information**

We may use cloud-based systems to process data and therefore data may be processed outside of the European Economic Area (EEA). When using cloud-based systems we will adopt the Information Commissioner's approved measures and therefore ensure that personal data will be held in compliance with European data protection regulations. We take all reasonable steps to ensure that your data are stored and processed securely in accordance with this policy. By submitting your personal data you agree to this transfer, storing and processing of your information.

Should you travel overseas with us, we may share personal information with partners who deliver our work in overseas locations. For example, this may include sensitive personal data such as medical information. When we do so we will make you aware of the data being transferred and seek your consent to do so.

## **WHEN WE SHARE YOUR INFORMATION**

In line with our beliefs, we do not share or swap your information with any other charities.

### **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 HM Revenue & Customs or if asked for details by a law enforcement agency.

### **Our service providers and third parties**

Occasionally we may employ agents to carry out tasks on our behalf, such as fulfilling orders or processing donations. These agents are bound by contract to protect your data and we remain responsible for their actions.

We may provide third parties with general information about users of our site, but this information would be both aggregate and anonymous. However, we may use IP address information to identify a user if we feel that there are or may be safety and/or security issues or to comply with legal requirements.

## **COOKIES**

### **What are Cookies?**

We may collect data using cookies. A cookie is a text file that may be sent from our website as soon as you visit the site. It is stored on your computer's hard drive and helps us to identify your computer (not you) and collects information in an aggregate, anonymous way.

Cookies may be used to collect information about your visit to our website, for example, traffic data, location data, device information, the date and time of your visit and the pages that you visit.

The use of cookies is an industry standard for most major websites. You can find more information about cookies by following these two links.

<http://www.allaboutcookies.org>

<https://www.aboutcookies.org>

### **Japan Christian Link's use of cookies on our website**

We may use the cookie data that we collect to:

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

### **Managing cookies**

Most browsers allow you to turn off the cookie function. To do this you should look at the help function on your browser.

### **Third party cookies**

Japan Christian Link may work with a number of third party suppliers who may set cookies on our website to enable them to provide us with services. These will usually be used for reporting and advertising purposes so we can improve the way we communicate.

We may 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.

Japan Christian Link may also use third party suppliers (such as Facebook 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 advertisements.

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) and can find more information from the Information Commissioner's website [www.ico.org.uk](http://www.ico.org.uk).

To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>.

## **HOW WE TREAT CHILDREN AND VULNERABLE PERSONS**

### **Aged 12 or under**

We do not actively seek to collect children's data. Where necessary to provide support to our Mission Partners and Network Partners (e.g. through maintaining lists of emergency contact details) we may occasionally hold and process information about children. Whenever we do this we will make sure that they have the child's parent's or guardian's permission first, before their personal information is provided to us.

### **Supporters in vulnerable circumstances**

We recognise the importance of identifying and assisting supporters in vulnerable circumstances. Staff who send or respond to supporter emails, mailings or calls are trained to be aware of, and to identify, signs of vulnerable circumstances and to deal with the supporter appropriately.

Personal information will be recorded so that we may respond appropriately in future, for example by ceasing fundraising requests or no longer sending emails, postal mailings or making calls.

## **YOU ARE IN CONTROL - HOW TO TELL US WHEN THINGS CHANGE**

### **Preferences**

You can change your preferences on what you receive from us or how we contact you, by mail, phone or email, at any time.

You can do so by:

Online: Managing your email preferences by accessing: <http://eepurl.com/casFjH>

Calling us on: 01732 455453

Emailing us on: [info@jclglobal.org](mailto:info@jclglobal.org)

Writing to us at:

Japan Christian Link  
P.O. Box 68  
Sevenoaks  
Kent TN13 2ZY

### **Updating your details**

We do appreciate it if you keep your details up to date. You can do so in the same way as updating your preferences (above).

We may use Post Office address search, postcode lists or other available sources to confirm data that you provide us with, where, for example, we are unsure of what you have completed on a form.

We will not use these sources to create data that you have chosen not to provide, for example, if you have left a telephone number blank; nor will we automatically update changes of address, we will normally only update your address when you tell us it has changed. However, if you are a regular giver, continuing to give regularly, and items such as JCL Newsletters are returned to us, we may use external sources to update your address details so that we may update you on how your donations are being used through our newsletter and contact you to confirm whether you would like to continue receiving our newsletter at your new address.

### **Telling us to stop processing**

You have the right to ask us to erase your personal data, to ask us to restrict our processing or to object to our processing of your personal data. You can do so at any time by writing to us at:

Director of Operations  
Japan Christian Link  
P.O. Box 68  
Sevenoaks  
Kent TN13 2ZY

### **Your rights under the General Data Protection Regulation**

You have the right to request details of the information we hold about you. To receive a copy of the personal information we hold please write to our Director of Operations at the address given below. We will respond within 28 days of receiving your letter. For more information about your rights under the General Data Protection Regulation you can visit the [website of the Information Commissioner's Office](#).

## **CHANGES TO JAPAN CHRISTIAN LINK'S PRIVACY & SECURITY POLICY**

### **Changes to this Policy**

This policy was established in April 2018. 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 our publications such as the JCL Newsletter or by writing to you directly. By continuing to use our website and/or continuing to contact us by email or telephone you will be deemed to have accepted these changes.

### **Feedback**

We welcome feedback or questions on this policy or on any of our actions by

**Calling us on:** 01732 455453

**Emailing us at:** [info@jclglobal.org](mailto:info@jclglobal.org)

**Writing to us at:**

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