



Privacy Notice

Sevenoaks Gospel Trust (“the Trust”, “we”, “our”, “us”) is committed to keeping your personal information safe and meeting our responsibilities under data protection law. Given that personal information can be used to identify you, we want you to be confident that we are using it responsibly. Your privacy is important to us.

This Privacy Notice gives you detailed information on why and when we collect your personal information when you use our website or otherwise engage with us, how we use your personal information, how we keep it secure, and how you can let us know if you would like us to change how we manage it. If you have any questions about this or any other aspect of this notice and how we use personal information, please contact us using the details set out at section 1 of this notice.

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1. Who we are and how to contact us

The Trust is a UK registered charitable company (registered with the Charity Commission with number 1179316 and at Companies House with company number 11371960). Under data protection law, we are what is known as a ‘controller’, which means that we collect and use personal information about individuals and determine how that personal information is used and for what purposes.

Our purpose is to advance and support the evangelical Christian faith in the Sevenoaks area by providing grants, loans or other funding to, and by acquiring or renting property and making it available for use by, churches and Christian charities or groups that are in sympathy with our Statement of Faith (available on our website - <https://www.sevenoaksgospeltrust.org/>).

If you have any questions about how we use your personal information and how we comply with our responsibilities, please email us (sevenoaksgospeltrust@gmail.com) or write to us Sevenoaks Gospel Trust, C/O Sedulo Office, 605 Albert House, 256-260 Old Street, London EC1V 9DD.

2. What personal information do we use?

Personal information is any information that relates to an individual. It does not include information where the identity of the individual has been fully and effectively removed (anonymous data).

We may collect, store and otherwise use the following kinds of personal information depending on how you interact with us:

- Your name and contact details, including email and postal address (including postcode) and telephone number;
- Details of any donations you make to us, including financial information such as bank details and or credit/debit card details;
- Your communication and marketing preferences, such as whether you wish to receive updates about our work by email (we will separately seek your consent to send you such updates);
- Any other personal information which you choose to share with us e.g. in an email you send to us, when speaking to us or information provided in relation to a grant or sponsorship application;
- Details of your relationship or interactions with us (for example, any of our events you have attended);
- Information about your assets and estate if you choose to leave us a legacy;
- Information about your computer/mobile device and your visits to and use of this website, including, for example, your IP address and general geographical location (e.g., city or region); and
- Any other type of information shared with/obtained by us, including as listed in section 2 of this notice.

Special categories of data

Data protection law recognises certain categories of personal information as sensitive and therefore requiring more protection. These categories of data include information about your health, religious beliefs, ethnicity, and political opinions.

When you register your support for our work, this may reveal your religious belief. We will use this data in the course of our legitimate activities and with appropriate safeguards in place as a non-profit with a religious aim. We do not otherwise seek to collect special category data. Where we do collect or use this type of personal information, we will only do so if there is a valid reason for doing so and were lawful. For example, we will usually seek your explicit consent to use such data.

3. When do we collect personal information about you?

We may collect and retain personal information relating to you from a number of sources, for example:

- a) When you give it to us **directly**. For example, personal information that you submit by contacting us (including via our giving form, through our website, if you provide us with details as part of a grant or sponsorship arrangement, and/or when making a donation) or any personal information that you share with us when you communicate with us in person (for example, when speaking with one of our Trustees about our work), by email, phone or post.
- b) When we obtain it **indirectly**. Your personal information may be shared with us by third parties, such as Stewardship who you can use to make gift aid eligible donations to us. To the extent that we have not done so already, we will notify you when we receive personal information about you from third parties, and tell you how and why we intend to use that personal information.
- c) When it is **publicly available**. Your personal information may be available to us from external publicly available sources. This may include information available on Companies House, Charity

Commission and other charity registers, reputable media articles, publications and company websites and professional networking sites such as LinkedIn.

- d) When you visit our **website**. When you visit our website, we automatically collect:
- Technical information, including the IP address used to connect your device to the internet, browser type and version, time zone setting, browser plug-in types and versions and operating systems and platforms.
 - Information about your visit to the websites, including the uniform resource locator (URL) clickstream to, through and from the website (including date and time), services you viewed or searched for, page response times, download errors, length of visits to certain pages, referral sources, page interaction information (such as scrolling and clicks) and methods used to browse away from the page.

You are not obliged to provide us with any personal information, but if you do not provide us with personal information, we may be unable to interact with you.

4. How we use your personal information

Your personal information, however provided to us, will be used for the purposes specified in this Notice. In particular, we may use your personal information to:

- a) provide you with services or information that you have requested and respond to questions you have asked, such as if you make an enquiry on our website about how to make a donation to us;
- b) communicate with you in general;
- c) provide updates about our work, services, activities or publications (where necessary, and only where you have provided your consent to receive such information, such as when signing up to receive our email updates about our work);
- d) ensure we are not contacting people who have told us not to;
- e) request donations and support;
- f) process your donations (which you can make directly to us or through Stewardship UK ([Make every gift count. | Stewardship](#)) if your donation is eligible for gift aid and you would like the trust to collect gift aid – see <https://www.sevenoaksgospeltrust.org/support-us>) and carry out any related due diligence on donors;
- g) receive and administer legacies, to communicate with you about any legacy you leave, and to evidence our entitlement to a legacy;
- h) process and make decisions about grant/sponsorship and support applications;
- i) decide how to support and facilitate support to our beneficiaries;
- j) further our charitable aims in general, including for fundraising activities and asking for your support;
- k) analyse, evaluate and improve our work, programmes, services, activities or information (including our website); and
- l) audit/administer our accounts.

In addition, we may use your personal information for the prevention of fraud or misuse of service, or for the establishment, defence or enforcement of legal claims.

As you may anticipate, personal information we hold about you may be accessed by our officers, staff or volunteers (if any), in connection with our work and services.

5. Lawful processing

We will only use personal information when the law allows us to (i.e., where we have a '**lawful basis**'). Most commonly, we will use your personal information in the following circumstances:

- a) **Consent:** Where you have provided your consent for our use of your personal information in a certain way, for example, where we ask for your consent to send you updates about our work via email. You may unsubscribe from our email communications by following the instructions in any email that we send you. Where we are processing your personal data on the basis of your consent, you can withdraw your consent at any time by emailing us using the details at section 1.
- b) **Legal obligation:** Where the processing of your personal information is necessary for us to comply with a legal obligation to which we are subject, for example where we have to share your personal information with regulatory bodies which govern our work.
- c) **Performance of a contract:** Where necessary for the performance of a contract to which you are a party or to take steps at your request prior to entering a contract (for example, if you apply to work for/volunteer with us).
- d) **Legitimate interests:** Where applicable law allows us to collect and use personal information for our legitimate interests, and the use of your personal information is fair, balanced and does not unduly impact your rights. In broad terms our "legitimate interests" means the interests of running the Trust as a charitable entity and pursuing our charitable aim to advance the evangelical Christian faith as well as through administering donations and legacies and supporting our beneficiaries.

We may rely on this ground to process your personal information when we believe that it is more practical or appropriate than asking for your consent. For example, if you contact us to ask about how you can support the charity, such as how to make a donation, we will rely on the legitimate interest ground to communicate with you in most instances.

We do not carry out any automated decision-making using personal information which produces legal effects or otherwise significantly affects individuals.

6. Do we share your personal information?

We may share your personal information with third parties, including the following:

- a) suppliers and sub-contractors for the performance of any contract we enter into with them, for example IT service providers such as website hosts, cloud storage providers or email clients such as Google Mail;
- b) financial providers and giving providers (such as Stewardship, who will provide us with your name and may provide us with other personal information if you provide your consent for them to do so), in relation to donations you make to us;
- c) insurers as well as professional service providers such as our accountants and lawyers;

- d) regulatory authorities, such as His Majesty's Revenue and Customs, if we are under any legal or regulatory obligation to do so;
- e) if we buy or sell any business or assets, or if substantially all of our assets are acquired by a third party, we may disclose your personal information to the prospective buyer or seller or such business or assets, and personal information held by us may be one of the transferred assets;
- f) if we are required to do so in connection with any actual or prospective legal proceedings, to establish, exercise or defend our legal rights.

Apart from where set out in this Privacy Notice, we will not sell, rent or lease your personal information to others. We do not share your personal information with third parties for marketing purposes (other than third parties involved in our marketing activities, such as marketing platforms and similar software providers).

We may also disclose your personal information to selected third party processors (such as agents or sub-contractors) for the purposes outlined at section 4. The third party in question will be required to use any personal information they receive in accordance with our instructions.

7. International Data Transfers

As we sometimes use third parties to process personal information, it is possible that personal information we collect from you will be transferred to and stored in a location outside the UK.

Please note that certain countries outside of the UK have a lower standard of protection for personal information, including lower security protections. Where your personal information 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 reasonable steps to ensure that appropriate safeguards designed to protect your personal information are implemented. In particular, we may rely on standard contractual clauses approved by the UK Government to protect your personal information. If you have any questions about the transfer of your personal information, please contact us using the details at section 1.

8. Securing your personal information

To protect your personal information, we will make sure it is kept securely and use appropriate technical and organisational precautions to prevent the loss, misuse or alteration of your personal information. We restrict access to those who need access to the information to perform their roles and we train staff in handling the information securely. We will store all the personal information you provide on secure servers. However, if you have reason to believe that your interaction with us is no longer secure, please immediately notify us using the details at section 1.

9. How long do we keep your personal information?

We will not keep personal information for longer than necessary, and the appropriate retention period will vary according to the intended purpose for which we collected the personal information.

The criteria we use to determine the retention period of personal information are: (i) the respective statutory retention period; (ii) our contractual and/or business relationships with you; (iii) (potential) disputes; and (iv) any guidelines issued by relevant regulators.

After expiration of the retention period, the relevant information is routinely deleted, as long as it is no longer necessary for the fulfillment of a contract, the initiation of a contract or to protect or defend our position or that of a third party. However, if before this date we are no longer lawfully entitled to process it or you validly exercise one of your rights of erasure (referred to at section 10), we will remove it from our records. If you leave a legacy to us, we will retain your personal information in connection with the legacy for as long as is necessary to process your legacy instructions.

If you have any questions about our retention periods, please contact us using the details at section 1.

10. Your rights and preferences

We explain how you can update your communication preferences above. Where we rely on your consent, you have the right to withdraw your consent at any time. When we use your personal information, you have the right to:

- a) ask us for **confirmation** of what personal information we hold about you, and to request **access** to a copy of that information. If we are satisfied that you have a right to see this personal information, and we are able to confirm your identity, we will provide you with the personal information that you are entitled to receive under data protection legislation.
- b) request that we **delete** the personal information we hold about you, as far as we are legally required to do so.
- c) ask that we **correct** any personal information that we hold about you which is inaccurate.
- d) **object** to the processing of your personal information where we: (i) process on the basis of the legitimate interest ground; or (ii) use the personal information for direct marketing.
- e) ask for the **provision** of your personal information in a machine-readable format to either yourself or a third party, provided that the personal information 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 you are party; and in either instance, we are processing it using automated means.
- f) ask for processing of your personal information to be **restricted** in certain circumstances, such as if there is disagreement about its accuracy or legitimate usage.

To exercise these rights, please use the contact details set out at section 1. Please be aware that we may be unable to provide these rights to you under certain circumstances, for example if we are legally prevented from doing so or can rely on exemptions.

If you decide you do not want to receive any further communications from us, please tell us. If you ask us to remove your personal information for marketing purposes, we will maintain a skeleton record comprising your name and contact details to ensure that we do not inadvertently contact you in the future. We may also need to retain some financial records for statutory purposes, for example Gift Aid.

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

11. Other websites

Our websites contain links to other websites. Please note that when you click on one of these links, you are entering another website for which we have no responsibility (even if you access the website via a link to one of our websites). We encourage you to read the privacy notices on all such websites.

12. Cookies

Our website uses cookies to enhance your experience while using those sites. Cookies are pieces of information that some websites transfer to the computer or device that is browsing that website and are used for record-keeping purposes at many websites. For further details about our use of cookies, please see our Cookie Notice.

13. Updating this privacy notice

We may update this privacy notice by posting a new version on this website. If we update this privacy notice in a way that significantly changes how we use your personal information, we will use reasonable efforts to bring these changes to your attention. Otherwise, we would recommend that you periodically review this privacy notice to be aware of any other revisions.

Version: 4.0

Dated: 15 September 2025