

# The Group-based Open Learning Discipleship (GOLD) Project

Charity Number: 1166567

## Privacy policy

Adopted June 2018 (Updated 2021) Who are we?

The Group-based Open Learning Discipleship (GOLD) Project is a Charitable Incorporated Organisation (CIO) registered in England, registered charity no. 1166567. The Objects of the CIO are:

- 1) The advancement of the Christian religion both in the United Kingdom and in other parts of the world by:
  - a) the provision of interactive self-study courses and programmes to be undertaken at home but supplemented and supported by a Gold Leader and interactive group discussions designed to increase understanding of the Bible, Christian Doctrine and Related Subjects and thereby better equip students for discipleship, ministry (whether ordained or lay) and mission in various Christian denominations;
  - b) such other exclusively charitable means as the trustees may from time to time determine.
- 2) The advancement of education by assisting in the training of men and women in their understanding of the Christian religion to equip them better for discipleship, ministry (whether ordained or lay) and mission in various Christian denominations.

## Summary

At GOLD Project, we're committed to protecting and respecting your privacy.

This Privacy Policy explains when and why we collect personal information, how we use it, the conditions under which we may share it with others and how we keep it secure.

We may change this Policy from time to time so please check this page occasionally to ensure that you're happy with any changes. This Policy should be read in connection with our Data Protection Policy.

### Why do we collect your data?

We collect personal data in order to fulfil our purpose as an organisation of running local, group based discipleship groups and associated activities such as study days.

### What data do we collect?

The categories of personal data we collect about you depends on your relationship with GOLD Project (See [categories](#) below).

### What is the source of the data we collect?

The source of the personal data we collect about you depends on your relationship with GOLD Project (See [categories](#) below).

### Who has access to your data?

We will only share your data with authorised representatives of GOLD Project to enable us to fulfil our obligations to you.

### How can you update your data?

Anyone who receives our newsletter can update their personal information via the link on the newsletter, or on the contact page of our website. (For further information see [categories](#) below).

### Where is your data stored?

Your data is stored on password protected computers and/or in secure filing storage systems. We use MailChimp, Microsoft One Drive and Google Applications to process information and to provide secure backup systems in accordance with GDPR guidelines.

### How long do we keep your data?

How long we keep your data depends on your relationship with GOLD Project and our legal obligations (See [categories](#) below).

### What rights do you have?

According to the GDPR, you have the following rights regarding our use of your personal data:

- The right to be informed – this privacy policy informs you about our use of your information
- The right of access – you have a right to ask what information we hold about you
- The right to rectification – you have a right to ask us to correct any information we hold.
- The right to erasure – While you have the right to ask for us to remove your personal data from our system, we reserve the right to keep information that we are obliged to retain to abide by current legislation and where there is a clear legitimate interest for us to keep this.
- The right to restrict processing – You have the right to ask us to restrict how we process your information.
- The right to data portability – You have the right to ask us to provide you with information that we hold about you in a format that can be used elsewhere.
- The right to object – You have a right to object to the way we use your personal data and to lodge a complaint with a supervisory authority.
- Rights in relation to automated decision making and profiling – At present we do not use any form of automated decision making. We only profile our students in order to receive feedback and improve our courses and services. For more information, use the contact details below.

For more information please click on the **category** below that applies to you:

- [supporter](#)
- [student](#)
- [Gold Leader](#)
- [employee](#)
- [trustee](#)

### Contact Details

The GOLD Project,  
PO Box 561,  
Witney,  
OX28 9PD

Website: [www.goldproject.org](http://www.goldproject.org)

If you have any queries about this Privacy Policy or Data Protection, please contact our Administrator: [admin@goldproject.org](mailto:admin@goldproject.org)

Return to [categories](#) above

## Supporters

### What data do we collect?

The categories of personal data obtained

1. *Personal Contact Details (as requested on MailChimp/Newsletter signup form)*
2. *Gift Aid Declarations (for supporters who give to the work of GOLD Project)*

### Why do we collect your data?

The purposes of the processing

1. *To send you our regular Newsletter by e-mail and occasional e-mails giving other information about GOLD Project activities and events.*
2. *To report to HMRC regarding Gift Aid*

The lawful basis for the processing

1. *Consent*
2. *Legal Obligation*

The legitimate interests for the processing

1. *To promote the work of the GOLD Project amongst friends and supporters*
2. *To abide by Government legislation regarding Gift Aid*

### What is the source of the data we collect?

The source of the personal data

- a. *MailChimp Sign-up forms*
- b. *Correspondence via Website or e-mail*
- c. *Sign-up forms at GOLD Project events*
- d. *Gift Aid forms*

### Who has access to your data?

- a. *Yourself (via MailChimp or e-mail correspondence)*
- b. *GOLD Project Administration*
- c. *HMRC regarding Gift Aid*
- d. *We do not pass on your data to others without your consent*
- e. *We do not sell your data to others.*

### Where is your data stored?

Details of transfers to third country and safeguards

- a. *MailChimp (contractually agreed to process information in accordance with GDPR)*
- b. *GOLD Project Database (password protected and backed up on Microsoft OneDrive)*

### How long do we keep your information?

- a. *As long as you desire to remain on our mailing list*
- b. *From time to time we will refresh our mailing list and will inform you that we plan to do this.*
- c. *As required by HMRC.*

### What [rights](#) do you have?

Return to [categories](#) above

## Students

### What data do we collect?

The categories of personal data obtained

1. *Student Personal Details*
2. *Student Marks and Fees*

### Why do we collect your data?

The purposes of the processing:

1. *Student Personal Details*
  - a. To contact students:
    - i. regarding their studies (and to deliver course materials)
    - ii. regarding study days
    - iii. (Opt-in) with Newsletter regarding GOLD Project News and events
  - b. To enable Gold Leaders to contact students:
    - i. regarding the studies of those in their groups
    - ii. regarding local events
  - c. To give references to sponsors (where sponsored by churches)
  - d. To enable analysis of students and improvement of courses
2. *Student Marks and Fees*
  - a. To keep up-to-date secure records of students records and progress
  - b. To enable the issuing of certificates of student participation at the end of each course
  - c. To enable the issuing of certificates/awards on completion of sufficient credits
  - d. To enable us to provide references for employment or further studies
  - d. To enable analysis of course engagement

The lawful basis for the processing

*Contractual Obligation*

The legitimate interests for the processing

*As an Educational Charity we are required to ensure that our courses are run in an accountable manner*

### What is the source of the data we collect?

The source of the personal data

1. *Student Personal Details*
  - a. Student Registration Forms (Student)
  - b. MailChimp Sign-up forms (Student)
  - c. Correspondence with Students and Gold Leaders
2. *Student Marks and Fees*
  - a. Group Registration Forms (Gold Leaders)
  - b. Student Record Sheets (Gold Leaders)
  - c. Correspondence with Gold Leaders

### Who has access to your data?

1. *Student Personal Details*
  - a. Yourself (via MailChimp or e-mail correspondence)
  - b. Your Gold Leader (via registration forms and letters)

- c. GOLD Project Administration
- d. Our publishing partners (i.e.: Tessell8 for delivery of courses)
- 2. *Student Marks and Fees*
  - a. Yourself (via Registration Letters and Certificates of Participation)
  - b. Your Gold Leader
  - c. GOLD Project Administration

### **Where is your data stored?**

#### Details of transfers to third country and safeguards

- 1. *Student Personal Details*
  - a. MailChimp and Tessell8 (contractually agreed to process information in accordance with GDPR)
  - b. GOLD Project Database (password protected and backed up on Microsoft OneDrive)
  - c. In GOLD Project Office
- 2. *Student Marks and Fees*
  - a. GOLD Project Database (password protected and backed up on Microsoft OneDrive)
  - b. With your Gold Leader
  - c. In GOLD Project Office
- 3. *We do not pass on your data to others without your consent*
- 4. *We do not sell your data to others.*

### **How long do we keep your data?**

- 1. *Student Personal Details*
  - a. As long as you desire to remain on our mailing list
  - b. Otherwise – 5 years from the date you last registered with us as a student.
- 2. *Student Marks and Fees*

Indefinitely (We will only keep your name, gender, date of birth, group name, and Gold Leader's name to identify you should you wish to access your student records in the future)

### **What [rights](#) do you have?**

Return to [categories](#) above

## Gold Leaders

### What data do we collect?

The categories of personal data obtained

1. *Gold leader Personal Details*
2. *Group Marks and Record Sheets*
3. *Gold Leader Application Forms and References*

### Why do we collect your data?

The purposes of the processing

1. *Gold Leader Personal Details*
  - a. To contact Gold Leaders:
    - i. regarding their study groups
    - ii. regarding study days
    - iii. regarding Gold Leader workshops and training events
    - iv. (Opt-in) with Newsletter regarding GOLD Project News and events
    - v. regarding delivery of course materials
  - b. To enable students to contact Gold Leaders:
    - i. regarding their studies
    - ii. regarding local events
  - c. To enable prospective students to contact Gold Leaders
2. *Group Marks and Record Sheets*
  - a. To keep up-to-date secure records of students records and progress
  - b. To enable the issuing of certificates (even at a later stage)
  - c. To request the Gold Leaders to clarify issues regarding students and their progress
3. *Gold Leader Application Forms and References*
  - a. To ensure appropriate selection and training of Gold Leaders
  - b. To enable the verification of GOLD Leaders

The lawful basis for the processing

*Contractual Obligation*

The legitimate interests for the processing

*As an Educational Charity we are required to ensure that our courses are run in an accountable manner*

### What is the source of the data we collect?

The source of the personal data

1. *Gold Leader Personal Details*
  - a. Gold Leader Application Forms (Gold Leader)
  - b. MailChimp Sign-up Forms
  - c. Correspondence
2. *Group Marks and Record Sheets*
  - a. Gold Leader
3. *Gold Leader Application Forms and References*
  - a. Gold Leader
  - b. Referees

**Who has access to your data?**

1. *Gold Leader Personal Details*
  - a. Yourself (via MailChimp or e-mail correspondence)
  - b. GOLD Project Administration
  - c. Your Students
  - d. Prospective Students (with consent)
  - e. Our publishing partners (i.e.: Tessell8 for delivery of courses)
2. *Group Marks and Record Sheets*
  - a. Yourself
  - b. GOLD Project Administration
3. *Gold Leader Application Forms and References*
  - GOLD Project Administration

**Where is your data stored?**

Details of transfers to third country and safeguards

1. *Gold Leader Personal Details*
  - a. MailChimp and Tessell8 (contractually agreed to process information in accordance with GDPR)
  - b. GOLD Project Database (password protected and backed up on Microsoft OneDrive)
  - c. In GOLD Project Office
2. *Group Marks and Record Sheets*
  - a. GOLD Project Database (password protected and backed up on Microsoft OneDrive)
  - b. In GOLD Project Office
3. *We do not pass on your data to others without your consent*
4. *We do not sell your data to others.*

**How long do we keep your data?**

1. *Gold Leader Personal Details*
  - a. As long as you desire to remain on our mailing list
  - b. Otherwise – 5 years from the date you last led a group.
2. *Student Marks and Fees*

Indefinitely (We will only keep your name and group name to identify students who wish to access their student records in the future)

**What [rights](#) do you have?**

Return to [categories](#) above

## Employees

### What data do we collect?

The categories of personal data obtained

1. *Personal Details*
2. *Employment Information (including contractual and legal information as well as review and appraisal)*
3. *Banking information*

### Why do we collect your data?

The purposes of the processing

1. *Personal Details*
  - a. To contact you regarding your employment
  - b. To fulfil our legal and contractual obligations
2. *Employment Information (including contractual and legal information as well as review and appraisal)*
  - a. To fulfil our legal and contractual obligations
  - b. For support and training
3. *Banking information*
  - a. To fulfil our legal and contractual obligations

The lawful basis for the processing

*Contractual Obligation*

The legitimate interests for the processing

*To ensure that we abide by best practice and fulfil our legal and contractual obligations*

### What is the source of the data we collect?

The source of the personal data

1. *Personal Details*

You
2. *Employment Information (including contractual and legal information as well as review and appraisal)*
  - a. You
  - b. HMRC and Government Agencies
  - c. Review and Appraisal meetings
3. *Banking information*

You

### Who has access to your data?

1. *Personal Details*

You and GOLD Project Administration
2. *Employment Information (including contractual and legal information as well as review and appraisal)*
  - a. You and GOLD Project Administration
  - b. HMRC and Government Agencies



*3. Banking information*

GOLD Project Administration (and our Bank and Finance Software)

**Where is your data stored?**

Details of transfers to third country and safeguards

- a. GOLD Project Computer (password protected and backed up on Microsoft OneDrive)*
- b. In GOLD Project Office*

**How long do we keep your data?**

*1. Personal Details*

As long as legally required to do so

*2. Employment Information (including contractual and legal information as well as review and appraisal)*

As long as legally required to do so

*3. Banking information*

Only while we are contractually obliged to do so

**What [rights](#) do you have?**

Return to [categories](#) above

## Trustees

### What data do we collect?

The categories of personal data obtained

1. *Personal Details*
2. *Banking information (when necessary)*

### Why do we collect your data?

The purposes of the processing

1. *Personal Details*
  - a. To contact you regarding your role as a Trustee and the governance of the GOLD Project
  - b. To fulfil our legal and contractual obligations to you and the government
2. *Banking information*

To pay expenses for your role as a GOLD Project Trustee

The lawful basis for the processing

*Legal Obligation*

The legitimate interests for the processing

*To ensure that we abide by best practice and fulfil our legal and contractual obligations*

### What is the source of the data we collect?

The source of the personal data

*Personal Details*  
You

### Who has access to your data?

1. *Personal Details*

You and GOLD Project Administration
2. *Banking information*

GOLD Project Administration (and our Bank)

### Where is your data stored?

Details of transfers to third country and safeguards

- a. *GOLD Project Computer (password protected and backed up on Microsoft OneDrive)*
- b. *In GOLD Project Office*

### How long do we keep your data?

1. *Personal Details*

As long as legally required to do so
2. *Employment Information (including contractual and legal information as well as review and appraisal)*

As long as legally required to do so
3. *Banking information*

Only while we are contractually obliged to do so

What [rights](#) do you have?

<b>Declaration</b>
I am connected with this organisation in my capacity as a <input type="checkbox"/> Member of staff <input type="checkbox"/> Volunteer
<input type="checkbox"/> I confirm that I have read and understood GOLD Project's Privacy Policy and will act in accordance with it.
<input type="checkbox"/> I give permission to GOLD Project to process my personal data in accordance with this policy.
<b>Signature:</b>
<b>Print name:</b>
Date:

Please return this form to  
The Director, GOLD Project, PO BOX 561, Witney. OX28 9PD

### Document History

<i>Date</i>	<i>Action</i>	<i>Timeframe for Review</i>
June 2018	Formally adopted by GOLD Project Trustees	3 years
21 <sup>st</sup> June 2021	Reviewed and revised by GOLD Project Trustees	3 years
June 2024	Review due by GOLD Project Trustees	3 Years