

# VINEYARD25 PUBLIC DATA PROTECTION POLICY

LAST UPDATED: February 25, 2026



# GOT QUESTIONS?

For any questions relating to data at Vineyard25, please contact [data@vineyard25.org](mailto:data@vineyard25.org) and we will respond accordingly.

The latest version of this policy can be found at this URL:

[Vineyard25 - Data Protection Policy.docx](#)

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# 02 DOCUMENT REVISION HISTORY

The below table describes historical changes to this document:

<b>Date</b>	<b>Authors</b>	<b>Change</b>
30-Apr 2018	Nick Price	Initial draft
30-Apr 2018	Debbie Moscardini	Minor grammatical amendments
02-May 2018	Nick Price	Added reasons for processing table, request & complaints sections
15-May 2018	Victoria Butters	Minor spelling corrections
22-Aug 2018	Nick Price	Logo update
1-Sep 2024	Nick Price	Updated references for Vineyard25
16-Feb 2026	Nick Price	Minor updates removing references to EU laws; new document created for storing on SharePoint and removal of old version from Google Drive

## 03 DEFINITIONS

The below table describes some key terms used throughout this Policy, to avoid confusion. Many terms are discussed and explained in further detail within the Policy.

<b>Term</b>	<b>Definition</b>
<b>Data</b>	A fact or figure; examples vary from numbers to a person's signature.
<b>Information</b>	When one or more pieces of data are processed (see below) to create something more meaningful than a plain fact or figure.
<b>Data privacy</b>	Data privacy generally refers to who can access a piece of data.
<b>Data protection</b>	Data protection generally refers to how access to a piece of data is restricted.
<b>Data processing</b>	Any action on data can be considered processing; e.g. obtaining, creating, storing, reading, copying, changing, moving, destroying.
<b>Data subject / individual</b>	A data subject or individual is the legal term for a person to whom the data in question relates.
<b>Personal data</b>	Types of data which can identify an individual, either directly (e.g. name) or indirectly (e.g. email).
<b>Special category personal data (previously known as sensitive personal data)</b>	A subset of personal data that receives additional legal protection under UK GDPR and the Data Protection Act 2018. This includes data revealing racial or ethnic origin, religious or philosophical beliefs, health data, biometric data, trade union membership, and data concerning sex life or sexual orientation.
<b>Data controller</b>	An organisation (not a person) that controls and is responsible for what, why and how personal data is processed for that organisation.
<b>Data processor</b>	An organisation that is instructed to process data by a data controller.
<b>Lawful basis</b>	The legal reason under UK GDPR that permits processing of personal data, such as consent, legitimate interests, legal obligation, vital interests, or contract.

# 04 THE LEGAL STUFF

## Who are we?

Wokingham Vineyard Christian Fellowship known as “Wokingham Vineyard”, “Vineyard25” or “V25”.

Vineyard25 is a Christian church affiliated to Vineyard Churches UK and a company limited by guarantee registered in England and Wales under the name Wokingham Vineyard Christian Fellowship (number 05269829).

We are a registered charity in England and Wales (number 1106781).

You can contact us via email at [admin@vineyard25.org](mailto:admin@vineyard25.org) or post. Our addresses are:

- Church office: Vineyard Church Centre, 25 Wellington Business Park, Crowthorne, Berkshire, RG45 6LS
- Registered address: 3 Longmoor Close, Finchampstead, Wokingham, Berkshire, RG40 4DZ

Accountability for Vineyard25's compliance with this policy rests with the Trustees, who may delegate an individual to act on their behalf.

## Scope of this policy

This privacy policy applies to all personal data processed by full-time and part-time employees, contractors and partners doing business on behalf of Vineyard25, as well as all legal entities, all operating locations in all countries (Zoe Zambia), and all church processes conducted by Vineyard25 that are subject to comply with the contents of the policy.

Where personal data is collected or processed in different countries, relevant local laws may also apply.

In case of uncertainty, stakeholders must consult the Data Protection Officer or church leadership responsible for data protection.

Collection of personal data by — and the disclosure to — governmental institutions and authorities will be carried out only based on specific legal provisions. In all cases, this privacy policy imposes those restrictions that are necessary to meet the legal requirements of the respective laws.

A separate internal Staff & Volunteer Data Protection Policy sets out the operational responsibilities and procedures that apply to those acting on behalf of Vineyard25.

# 05 INTRODUCTION

## What is the purpose of this document?

This Policy document describes the personal data and information we process at Vineyard25 (the “controller”). It does not cover non-personal data in detail.

This Policy applies to all subsidiaries, business units and personal data-processing activities under the responsibility of Vineyard25, including Zoe Zambia, Crowthorne Foodbank and Crowthorne Growbaby.

The UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 set out the law governing how personal data must be processed in the United Kingdom. The Information Commissioner’s Office (ICO) is the UK’s independent authority responsible for regulating and enforcing these laws.

This Policy refers to UK GDPR and the Data Protection Act 2018 as the basis of legal rights and responsibilities for both Vineyard25 and the individuals whose data we process.

## What is personal data?

Under UK GDPR, personal data relates to a living individual who can be identified either:

- directly from the data or,
- from the data in combination with other data that may come into the controller’s possession

Certain types of personal data that receive additional legal protection are known as “special category personal data”.

The following table may help to illustrate what is, and what is not, personal and special category information:

Not personal data	Personal data	Special category information
Address without a name	Name and address	Racial or ethnic origin
Generic or company email address (e.g. <a href="mailto:hello@company.org">hello@company.org</a> )	Personal email address	Religious or philosophical beliefs

Receipts showing only partial card numbers	Signatures	Physical or mental health information
Company name and website	Pay records even without a name if identifiable	Biometric information
Aggregated financial summaries	Web cookies linked to an individual	Political opinions
Anonymous statistics	Attendance records or pastoral notes	Data concerning sex life or sexual orientation

# 06 HOW DO WE PROCESS YOUR PERSONAL DATA?

Personal data may be used in several ways, including collecting, storing, using, sharing, archiving and deleting it. The diagram to the right illustrates these activities, with people at the centre.

The following sections explain who we collect data on, why we process it, how it is stored and shared, and the rights individuals have in relation to it.

If anything in this document is unclear, please contact us and we will be happy to explain how it applies to your context.



## Who do we collect personal data on?

We collect and process data on a wide range of people, both within our core church and also within and linked to our outreach ministries. For the purposes of data privacy, we group our people into three categories (please note that this list may not be exhaustive) :

- Core
  - Company Directors and Trustees
  - Paid staff
  - Volunteers, including unpaid leadership team
  - Sunday attendees
  - Donors
- Outreach Ministries (including Zoe Zambia, Foodbank, Growbaby and Out to Tea)
  - Volunteers
  - Clients (including Foodbank, Growbaby and Out to Tea)
  - Zoe Zambia staff, volunteers, guardians and sponsored orphans
- Other
  - Business contacts and loan recipients

We may also process data on people who are no longer members of the above groups, for example volunteers who used to serve in one of our ministries.

## Why do we process your personal data?

We process your personal data for one of seven reasons. The table below illustrates why we process different people's data for different reasons.

In some cases, we process multiple parts of an individual's personal data due to different reasons for processing.

Reason for processing	Notes
<b>Consent</b>	Where consent is used as the lawful basis, it must be freely given and may be withdrawn at any time.
<b>Contract</b>	Processing necessary to fulfil a contract, for example employment or supplier agreements.
<b>Legal obligation / public interest</b>	Processing required to comply with legal requirements or official requests (for example safeguarding or law enforcement requests).
<b>Vital interests</b>	Processing necessary to protect someone's life or health (for example providing medical or safeguarding information in an emergency).
<b>Legitimate interests</b>	Processing necessary to operate the church effectively, provided this does not override individuals' rights and freedoms.

If you're interested in finding out more about why we process your specific personal data, please get in touch with us.

## What types of data processing do we undertake?

Processing means any action carried out on personal data, such as collecting, storing, using, sharing, or deleting it.

There are a wide number of uses for us to process your personal data, many of which are explained when the data was collected. The below list shows a number of examples of how we may process your personal data:

- Collecting and storing your personal data (for example entering written data into an electronic format)
- Using your contact details to speak to you
- Using your personal data to support pastoral care (for example, if you are a newcomer or stop attending Sunday services)
- Matching bank statements to your giver reference to understand how you give
- Plotting Sunday attendees' addresses on a map to understand how people travel to church
- Storing bank account details to reimburse your expenses
- If requested by the government, showing completed consent forms to show your consent to us processing your data
- Sending emails to you, including one-off emails and regular newsletters
- Including photographs on the website

## Who do we share your personal data with?

As shown above, we primarily share your personal data with our platforms, who perform data processing on our behalf. The below list shows our main platforms and their functions, but this may change from time to time, for example in the future to collect online payments via our website:

- ChurchSuite (for contact details, teams, connect groups and events)
- Planning Centre Online (for planning worship)
- Google Drive (to store documents and files)
- Trussell Trust (to support Foodbank)
- Mailchimp (to send weekly emails)
- Xero (to support financial accounting)

We may also share your personal data to support official government requests for information, for legal reasons, or for safeguarding issues.

Please note that each platform has its own privacy policy - please get in touch for more information.

## Where do we store your personal data?

As with any business, we hold your data in across both electronic and paper formats. Examples of data storage locations include:

- Devices (e.g. Computers, tablets, and phones)
- Portable media (e.g. USB memory stick, CD, DVD)
- Platforms (e.g. ChurchSuite for contact details, accounting software for expenses, or Microsoft SharePoint/OneDrive for shared files; CPOMS for safeguarding)
- Web hosts and email accounts
- Web browser cookies
- Filed paper (e.g. forms that you may have signed, or documents we may print and store as hard copies)

## Protecting your data

We take reasonable steps to protect personal data and to limit access to those who need it to conduct their role. We also consider data security when deciding to use a new platform. A range of different people may have access to various parts of your data, including paid and unpaid team members. Wherever possible, these members are trained on good data hygiene practices and data protection.

The news often talks about “data breaches”. When personal data is exposed unintentionally to a person outside of our organisation, it is classed as a “data breach.”

If a data breach occurs, we will investigate it promptly and take appropriate steps to manage the situation and reduce the risk of harm.

Staff and volunteers should report any suspected data breach as soon as possible.

## How long do we process your personal data for?

We aim to retain personal data only for as long as necessary for the purposes for which it was collected, or to meet legal or safeguarding requirements.

Different types of documents and data require different durations, for example financial accounts may be kept for a minimum of 7 years, or a volunteer’s contact details may be kept for 2 years after they have left the outreach ministry.

To enquire on the duration a specific type of document or data is kept, please contact us.

## How do we destroy your personal data?

We erase and destroy data from time to time; an example could be a staff member from 10 years ago, who we no longer need the information on. We do not normally notify individuals when routine data deletion takes place.

For digital documents, we permanently delete these from whichever storage location they currently sit.

For paper documents, we either incinerate or shred and dispose of these documents.

## What are your legal rights?

UK GDPR outlines several legal rights:

Your right to	Legal Right
<b>Be informed</b>	Be informed about how personal data is processed
<b>Request access</b>	Request access to personal data in a portable, readable format where appropriate
<b>Update personal data</b>	Request correction of inaccurate or incomplete personal data
<b>Request erasure</b>	Request deletion of personal data where applicable
<b>Request restriction</b>	Request restriction of processing in certain circumstances
<b>Object to processing</b>	Object to processing based on legitimate interests
<b>Object to direct marketing</b>	Object to receiving direct communications
<b>Automated decision making</b>	Request human involvement in significant automated decisions where applicable

## How can you consent?

We collect consent via written form (for example, your name, date and a signature) or via an electronic form (for example, a tick box or submit button).

If you're reading this document, it is likely you have been given a form to complete. However, if you don't have a form but wish to consent, please contact us.

At a minimum, to consent we will require your full name.

## How should individual requests be made?

You are entitled to make the following requests, any of which will be logged (even after deletion of your personal data):

Request type	Notes
<b>Accessing your personal data</b>	Specific requests are preferred, but full data exports may be provided where appropriate.
<b>Erasing your personal data</b>	We will discuss implications before erasure where services may be affected.
<b>Updating your personal data</b>	Electronic records can be updated; paper records may be annotated or superseded where appropriate.
<b>Restricting processing</b>	We will attempt to restrict processing where feasible and lawful, though technical or legal limitations may apply.

Please contact us with your requests in as much detail as possible, as discussed in the previous section via email or in written form, with details of how to best contact you.

Note that Vineyard25 have up to 30 days to respond to your request.

In some circumstances we may not be able to erase or restrict personal data, for example where it is required for safeguarding, legal, or operational reasons.

You can read more on requesting information, along with a wide range of other information on data privacy legislation on the Information Commissioner's Office (ICO) website by visiting <https://ico.org.uk>.

# Appendix

## Appendix A – Quick Answers: is it Data Protection or Safeguarding?

<b>Use Case</b>	<b>Primary framework</b>
<b>Collecting contact details</b>	Data protection
<b>Sending emails or newsletters</b>	Data protection
<b>Attendance at youth events or trips</b>	Safeguarding
<b>Medical or allergy information</b>	Safeguarding and vital interests/emergency care
<b>Emergency contacts</b>	Safeguarding
<b>Photos and media</b>	Data protection + safeguarding consideration

