Privacy Policy

The Focolare Movement in GB is committed to protecting personal information and we take our responsibilities regarding the security of your personal information very seriously. This Privacy Policy explains what personal data we collect about you, how and why we use it, who we disclose it to and how we protect it.

1 Who is responsible for your data

Our privacy Policy applies to the personal data that the Focolare Movement in GB collects and uses.

References in this Privacy Policy to “Focolare Movement”, “we”, “us” or “our” mean the Focolare Trust a registered charity in England and Wales (279072) in Scotland (SC039844)and Mariapolis Ltd registered charity (257912) in Scotland (SC040066) at the following addresses:

Focolare Trust	Mariapolis Ltd
39 Lemsford Village	Unit 1, Polaris Centre
Welwyn Garden City	41 Brownfields – Welwyn Garden City
AL8 7TR	Herts AL7 1AN

We are the “data controller” for the purposes of the UK Data Protection Act 1998 and other applicable European data protection legislation. We control the ways your personal data is collected and the purposes for which your personal data is used.

The Focolare has a designated Data Protection Officer who can be contacted via dataprotection@focolare.org.uk.

2 Personal data we collect about you

When using the term “personal data” in our Privacy Policy, we mean information that relates to you and allows us to identify you, either directly or in combination with other information that we may hold.

We collect personal data from you when you subscribe on our website, when registering for an event, when completing an evaluation form or through personal contact.

The Focolare will ensure that your personal data is adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.

2.1 Bank details

We use your name, sort code and account number when you register for an event or make a purchase, however we do not store this information once the relevant transaction is completed.

2.2 Non-personalised data

When you visit our website we collect non-personal data such as details of web pages visited and files downloaded. Website usage information is collected using cookies. Please see the section on cookies below.

2.3 Social media

We collect your posts and messages directed to Focolare in GB on social media. We collect this when you interact with us on social media platforms such as Facebook, Twitter, Instagram.

2.4 Legacy administration

We collect personal data of an executor where necessary for legacy administration when someone dies leaving a legacy to the Focolare Movement.

2.5 Sensitive personal data

We collect and use personal data you provide to us to contact you and inform you about Focolare Movement activities. We recognise that many of our contacts hold religious beliefs and, since this can be considered to be sensitive information, we put in place policies and procedures to ensure that your personal data is kept secure. We may also collect medical information for use in case of a medical need or emergency. This information is only accessed on a need-to-know basis. Unless required by law or as otherwise described in this Privacy Notice, we do not disclose your personal data to any third party without your prior consent.

3 Sharing your personal data

3.1 Focolare does not share your data with any other organisation, public body or commercial organisation, unless we have to do so for either legal or compliance reasons, or where it is more cost effective and efficient for us to use a third party to deliver a product or service on our behalf such as for emailing.

3.2 Your data is only shared within the Focolare to manage, organise, plan, run or operate the activities that you have consented to, and for operational reasons. This may mean your data could be passed on to a Focolare Centre near to where you live or to a Youth activities co-ordinator within the Focolare Movement.

3.3 Focolare Movement will on occasion when necessary, share personal data and compile reports for the Focolare's international centres containing your personal data only with your consent.

3.4 Data collected from registering for an international Focolare event will be shared with the international Focolare Centre organising the event.

3.5 We may need to pass on personal information if required by law or by a regulatory body. For example, if requested as part of a Gift Aid audit or by a law enforcement agency.

4 How and why we use your personal data

We use your personal data for the following purposes:

4.1 To communicate with you

4.1.1 We may need to contact you by post, email and/or telephone for administrative or operational reasons – for example, to inform you of a Focolare Movement event, communicate Focolare Movement News or send you information you have requested.

4.1.2 To contact you after you have sent us a request, filled in a web form through our website or contacted us on social media.

4.2 To tailor our communications to your needs and preferences and to provide you with a more relevant experience, for example, by sending you communications on topics in which you have shown an interest in previously.

4.3 To protect your vital interests (For example if you were unfortunate enough to fall ill or suffer an injury on our premises, then we may pass on information to the NHS for treatment purposes and to family members).

4.4 Opting-in

The Focolare will occasionally provide you with the opportunity to opt-in to receiving certain types of communication. If you are already receiving such communication, you do not need to opt-in again as your existing preference will persist until you provide explicit instruction that you want to opt-out.

We will only use the communications you exchange with us and the feedback you may provide to improve our events and communications.

4.5 Opting-out

You can choose to opt-out of receiving email communications at any time by clicking on the relevant unsubscribe link at the bottom of any emails you may receive from us or in writing to one of the above addresses

4.6 Legal reasons

We keep details of financial transactions, including donations, for seven years to meet accountancy and HMRC requirements.

Some people kindly tell us that they have included a gift to Focolare in their will, or that they intend to do so. We retain their personal information indefinitely to keep in touch during their lifetime and provide a caring and efficient legacy administration service.

4.7 Historical archives

We collect personal data necessary for preserving our history. For example, we keep the information of those who have given legacies to the Focolare Movement or who have contributed in a significant way to the development of the Focolare Movement in Great Britain.

By reason of the consent expressed by the user, where required, it is possible you we may be contacted via e-mail, text message, or through any equivalent electronic tool or by paper mail or telephone call using contact details provided. If you prefer to be contacted only to one or some of these addresses, you can make a specific request by using this link or by emailing dataprotection@focolare.org.uk or in writing to one of the above addresses.

5 Legal basis for processing your personal data

The General Data Protection Regulation requires organisations to consider the legal basis on which they process personal data.

Focolare will process personal data in line with the following principles:

5.1 With your consent: we will send you emails, make telephone calls, send you SMS text messages, take photos, make audio recordings, videos with your explicit consent.

5.2 When it is in our legitimate interests to do so: To promote Focolare Movement activities, events and to provide information to anyone interested in the goals of the Focolare. To maintain and improve our own accounts, records and organisational processes, to fulfil our administrative purposes, protect our charitable interests, complying with legal purposes and historical archiving.

6 Data analysis

We do not routinely use external sources to update our database, for example, if there is a change of address. We will normally rely on you to tell us if your details have changed. However, if you are an active contact and we find mailing items are returned to us, we may use external sources to update your address so that we can maintain contact with you.

Our activities are often age related, faith related or related to particular interests or professions. We conduct analysis of information such as date of birth, faith, interests and professions to tailor our communications to those we believe may be of interest to you.

7 Children and vulnerable people

6.1 Children

We are committed to protecting the privacy of the young people who engage with us through our website, at events and at schools. If a person is under 16 and would like to get involved with the Focolare, we will ensure we have consent from a parent or guardian before obtaining personal information.

When we collect information about a child or young person aged under 16 we will make clear the reasons for collecting this information, as well as how the information will be used, shared, stored and for how long.

The Focolare is a member of the Keeping Children Safe coalition

6.2 People in vulnerable circumstances

We are committed to protecting vulnerable people. We may record relevant personal information so that we can respond appropriately in future – for example, by ensuring the correct information is collected and appropriate accommodation and food is available.

8 How long do we keep personal data?

We take appropriate physical, electronic and managerial measures to ensure that we keep your information secure, accurate and up to date, and that we only keep it as long as is reasonable and necessary.

9 Your Rights

At any time you may:

- Request details of some or all of the personal information we hold;
- Request a copy of your personal information;
- Withdraw the consent you have provided previously for processing your personal data;
- Request that we correct or remove the information we have on file;
- Request that we restrict the processing of your personal information in certain ways;
- Ask that we delete your Personal Data where there is no compelling reason for us to continue to process it; or
- Object to specific processing of your personal information.

Please note: The above rights may be limited in some situations – for example, where we can demonstrate that we have a legal requirement to process your Personal Data. Also, we may need you to provide us with proof of identity for verification and data security purposes before you can exercise your rights.

You may make any of the above requests by contacting the Data Protection Officer by email at dataprotection@focolare.org.uk or in writing to one of the above addresses.

10 Uploading information to the Focolare website

All material uploaded to our website is subject to approval by the Focolare before being used. By uploading material in the form of photographs, videos, stories or any other format onto our site you are automatically agreeing to the Focolare editing and using your material on the website and in future promotional material or events. This agreement is lifelong and royalty free and non-exclusive to the Focolare.

The person uploading material should be 18 or over and, if not, must have the express permission of a parent or guardian to upload the material.

Material uploaded must not violate any copyright laws, the rights of any third party or any other laws. Photographs and videos must have been taken with the knowledge of the subjects, or where the subjects are under 18, with the permission of their parent or guardian. All subjects must have given permission for the material to be used by the Focolare.

By submitting material you agree that the Focolare has the right to share the material with any third party involved in the submission and receipt of the material as well as any third parties which the Focolare uses to act on their behalf.

Under certain laws and regulations the Focolare might be asked to disclose information to government agencies or employees. By submitting material you authorise the Focolare to do this without having to give you prior notice.

The Focolare will use any material in accordance with our own data protection policy and the Data Protection Act (1988).

In exceptional circumstances, your personal data may be accessed by and processed outside the European Economic Area (EEA) by the Focolare staff based outside the EEA, working in our international centres. Where your personal data is transferred outside of the EEA, we require that appropriate training and safeguards are in place.

10.1 Cookies

The Focolare Movement website uses various types of “cookies” (small text files which are stored on your computer, mobile or other device when you visit our website). The use of *session cookies*, which are not memorized in a permanent or persistent way on the user’s computer, is strictly limited to ensure a more secure and efficient browsing of the website.

Session Cookies do not collect any personally identifiable data. See the Extended Information Document regarding the use of cookies on this website**.**

The browser settings can be configured to block cookies or the system prompts the user to change the cookie settings. It is important to be aware that in choosing to block the cookies, the user may be preventing from utilizing all the functions and services of this website.

Almost all modern browsers have the functionality to block cookies from being set, and there are a number of third party tools that can also do this. If you choose to block all cookies it is likely that the functionality of both our own and the majority of other websites will be impacted, given the importance of cookies to the development of the internet.

None of the personal data of users are purposely acquired from the site. **Cookies are not used for relaying personal information**, and also *persistent cookies* of any type, that is, systems which track users, are not used on this site.

The use of so-called ***session cookies*** (that are not memorized in a persistent manner on the user’s computer and disappear upon closing of the browser) **is strictly restricted to the transmission of session identification data** (constituted by casual numerals generated by the

server) and are necessary to allow safe and efficient surfing of the site.

The *session cookies* used on this site do not resort to other information gathering techniques which could potentially jeopardise the privacy of users browsing the website, and do not allow the acquisition of personal data that can identify the user.

10.2 Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy policy. You should exercise caution and look at the privacy policy applicable to the website in question.

11 Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Focolare Movement shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO (more information on the ICO website).

12 Updates to our Privacy Policy

We may make changes to this Privacy Policy from time to time. You are advised to visit this section of our website periodically to keep up to date with the changes to our Privacy Policy.

We welcome any questions, comments and requests regarding this Privacy Policy and these should be addressed to the Data Protection Officer by email at dataprotection@focolare.org.uk or in writing to one of the above addresses.