

Privacy Policy

St Mellitus College respects your privacy and is committed to protecting your personal data.

1. Important information and who we are

Purpose of this privacy notice

St Mellitus College (SMC) is a partnership between St Mellitus College Trust (SMCT) and St Paul's Theological Centre (SPTC). This privacy notice aims to give you information on how SMC collects and processes your personal data, including any data you may provide through this website when you interact with us, apply to be a student at SMC, register for an event, donate to the charity, pay tuition fees, apply for a role as a volunteer or staff member or sign up to our newsletter. It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

St Mellitus College Trust is a charity registered in England and Wales with number 1094157 and a private company limited by guarantee registered in England and Wales with number 4546328 whose registered office is at 24 Collingham Road, London, SW5 0LX (SMCT). St Paul's Theological Centre is a charity registered in England and Wales with number 1111609 and a private company limited by guarantee registered in England and Wales with number 5543940 (SPTC).

This privacy notice is issued on behalf of SMC so when we mention "we", "us" or "our" in this privacy notice, we are referring to the relevant SMC charity responsible for processing your data. SMCT is the controller and is responsible for this website.

We have appointed a data protection lead (DPL) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPL at info@stmellitus.ac.uk, by calling 0207 052 0573, or writing to SPTC, c/o St Mellitus College, 24 Collingham Road, London, SW5 0LX.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes

We will keep this privacy notice under regular review to ensure it represents an accurate reflection of the way we use your personal information.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- Contact Data includes billing address, delivery address, email address and telephone numbers.
- Financial Data includes bank account and payment card details.
- Transaction Data includes details about payments to and from you and other details of events, courses, and programmes you have attended through us or gifts you have donated to us.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- Profile Data includes your username and password, application form responses, academic records, your interests, preferences, feedback and survey responses.
- Usage Data includes information about how you use our website, events, courses and programmes.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

As a faith-based charity providing Christian teaching and training, the information we collect may be considered to come within the definition of Special Categories of Personal Data. Special Categories of Personal Data includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, gender, disability, political opinions, trade union membership, information about your health and genetic and biometric data. We will always make it clear to you when we collect this information and why. For some of our events and services we may also collect information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to withdraw your offer to study or cancel a service you have with us but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for a course / programme;
 - donate online, by text message or completing a giving envelope;
 - create an account on our website;
 - register for an event;
 - subscribe to our services or publications;
 - request marketing to be sent to you;
 - respond to a survey; or
 - give us some feedback.
- Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our [Cookies Policy](#) for further details.

- Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:
 - Technical Data from analytics providers such as Google based outside the EU.
 - Identity and Contact Data from publicly available sources based inside the EU.

4. How we use your personal data

We collect and use information about our students, suppliers, contractors, the Church of England's national and diocesan staff, and personnel working for relevant public bodies. This information is used to manage and administer the College and to carry out our College's purposes. We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests.

Generally we do not rely on consent as a legal basis for processing your personal data other than when we collect Special categories of Data or in relation to sending direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by clicking on an unsubscribe link in one of our emails to you or by emailing info@stmellitus.ac.uk.

Purposes for which we will use your personal data

We have set out below a description of the ways we plan to use your personal data. SMC collects and processes information so that we can:

- Manage and administer SMC and SPTC
- Administer financial transactions and donations
- Administer our programmes and courses
- Manage our websites and social media accounts
- Manage our volunteers and HR function
- Prevent and detect crime
- Comply with a legal or regulatory obligation

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please email info@stmellitus.ac.uk if you need details about the specific legal ground we are relying on to process your personal data.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You will receive marketing communications from us if you have requested information from us, attended an event or course with us and, in each case, you have not opted out of receiving that marketing.

We will get your express opt-in consent before we share your personal data with any company outside SMC for marketing purposes. You can ask us or third parties to stop sending you marketing messages by emailing info@stmellitus.ac.uk at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a course or event registration or other financial transactions.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. You can read more about how we use cookies by reading our [Cookies Policy](#).

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please email info@stmellitus.ac.uk.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in paragraph 4 above.

- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary
- Third parties to whom we may choose to sell, transfer, or merge parts of our activities or our assets. Alternatively, we may seek to acquire other charities or merge with them. If a change happens, your personal data will be used in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

Some of our external third parties are based outside the UK so their processing of your personal data will involve a transfer of data outside the UK

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We may transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the UK Government. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries linked [here](#).
- Where we use certain service providers, we may use specific contracts approved by the ICO which give personal data the same protection it has in the UK. For further details, see UK: [Model contracts for the transfer of personal data to third countries](#).
- Where we use providers based in the US, we may transfer data to them if they are part of the UK Extension to the EU-US Data Privacy Framework (Data Bridge) which requires them to provide similar protection to personal data shared between the UK and the US. For further details, [see UK Data Bridge](#).

Please email info@stmellitus.ac.uk if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by emailing info@stmellitus.ac.uk.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- [Request access to your personal data.](#)
- [Request correction of your personal data.](#)
- [Request erasure of your personal data.](#)
- [Object to processing of your personal data.](#)
- [Request restriction of processing your personal data.](#)
- [Request transfer of your personal data.](#)
- [Right to withdraw consent.](#)

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please email info@stmellitus.ac.uk.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our charities in conducting and managing our charitable activities to enable us to give you the highest quality courses, events, products and services and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by emailing info@stmellitus.ac.uk.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

Internal Third Parties

SMCT and SPTC acting as joint controllers or processors and Holy Trinity Brompton which provides IT system and administration services.

External Third Parties

- Service providers acting as processors based in the UK who provide website, social media, media and IT and system administration services
- Course and event management systems including Eventbrite*.
- Electronic marketing and research services such as Mailerlite*, Cognito Forms*
- Professional advisers including lawyers, bankers, auditors, pension advisors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Holy Trinity Brompton which provides IT system and administration services. Here is HTB's [Privacy Policy](#).
- HESA – The Higher Education Statistics Agency requires certain student data in addition to what is submitted on an application form. Here is their [Privacy Policy](#).

- Office for Students – is the government-approved regulatory and competition authority for the higher education sector in England from 1 April 2018. Here is their [Privacy Policy](#).
- Church of England – the Church of England receives necessary data regarding ordinand and LLM students. Here is their [Privacy Policy](#).
- Student Loans Company – SLC will receive necessary data regarding students who receive a tuition or maintenance loan. Here is their [Privacy Policy](#).
- Common Awards – Durham University – Durham is one of the accrediting bodies of St Mellitus College and as such receives necessary data regarding Durham-accredited students. Here are their [Privacy Policies](#).
- Moodle – Moodle is the virtual learning environment which St Mellitus College uses to cater to each student’s bespoke needs, with module guides, student handbooks, assignment schedules, and reading lists. This is an open source resource. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. The St Mellitus College Moodle also provides access to The Hub, a central repository of learning resources provided by the Church of England Ministry Division. The site may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements.
- TEID is the internal student database which St Mellitus College uses to capture student records and record HESA special category data in partnership with Redentu developers. We have put in place appropriate technical and organisational measures to protect your personal data, and to prevent from being accessed or processed unlawfully. Whenever a third party processes personal data on our behalf, we will ensure it is processed in accordance with our instructions, and in line with this privacy policy.
- Turnitin – Turnitin is the plagiarism detection service used in relation to student assignments. Here is their [Privacy Policy](#).
- Sage – Sage accounting is a software used to process historic student invoices. Here is their [Privacy Policy](#).
- Access Dimension – Access Dimensions is an accounting software used to process student invoices. Here is their [Privacy Notice](#).

- JISC Online Surveys – this is used to collect data for Graduate Outcome Surveys. Here is their [Privacy Policy](#).
- Residential Venues – the residential venues used for the training of ordinands receive a small amount of data in order to accommodate staff and students’ particular needs.
- Placement organisations – students who are engaged in a placement as part of their training.
- National Student Survey – NSS is conducted annually by the college. Here is their [Privacy Policy](#).
- Heritage – Heritage is the library software used at St Mellitus College. St Mellitus College has a third-party data sharing agreement in place.
- Prevent for Further Education and Training – The Prevent duty is part of the Safeguarding duty for education providers. Here is their [Privacy Policy](#).
- JustGiving – To enable donations to St Mellitus College we use JustGiving. Here is their [Privacy Policy](#)
- Zoom, who provide an online video conferencing service that we use for meetings, courses, events and training. Here is their [Privacy Policy](#) and [Privacy Shield Notice](#).

Eventbrite and Cognito are US-based companies and are therefore covered by the Data Privacy Framework.

- Eventbrite’s [Privacy Policy](#).
- Cognito’s [Privacy Policy](#).

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