

Cambridge Papers Limited

Privacy Policy

Who we are

Cambridge Papers Limited is a not-for-profit organisation established as a company limited by guarantee registered in England and Wales No. 3078382. Our registered office is at 51 Roseford Road, Cambridge CB4 2HA. Our website address is: <https://www.cambridgepapers.org> .

Cambridge Papers Limited exists to advance Christianity by, in particular, making available publications and resources, characterised by engagement with and commitment to Holy Scripture, which promote greater understanding of the spiritual, intellectual, relational, ethical, and practical implications of Christianity and commend Christianity by illustrating its contemporary relevance.

In this Privacy Policy, “CPL”, “we” and “us” refer to Cambridge Papers Limited.

How we collect and use your information

Your privacy is important to us and we are committed to safeguarding the privacy of your information and complying in full with data protection legislation.

Please read this Privacy Policy (together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you). Its aim is to ensure that you understand how and why we collect, hold, use (and in some circumstances) share your personal data and your rights in relation to any personal data we hold.

The Appendix to this Privacy Policy contains the definitions of certain key terms (‘controller’, ‘processing’, and ‘personal data’) which you may wish to consult. For the purposes of this Privacy Policy, Cambridge Papers Limited is the data controller and responsible for your personal data.

How and when do we collect information?

We may collect your personal data in the following ways:

- If you sign up to our e-newsletter via our website;
- If you subscribe to Cambridge Papers in order to receive printed copies delivered to a UK address;
- If you make a donation using the online donation facility on our website;
- If you make a donation otherwise than via the online donation facility on our website; or
- Through your direct contact with us; and
- From publicly available information.

These different scenarios and how your personal data is collected and processed in each case, are considered below.

Cont'd/...

If you sign up to our e-newsletter via our website

By providing your name and email address via the form on this website, you agree to us sending you our email newsletter (“e-newsletter”). The form on our website by which you can sign up to our e-newsletter is an opt-in mailing list. We use **Mailchimp’s** online products and services to maintain our e-newsletter mailing list and to distribute our e-newsletter.

If you subscribe to our e-newsletter, you consent to:

*your personal information being shared with and processed by **Mailchimp** on our behalf. For more information about **Mailchimp** and your personal data, please see the section below ‘*Who do we share your information with?*’; and

*the use by **Mailchimp** of cookies in each email we send to you using their services. For more information about **Mailchimp** and such cookies, please see the section below ‘*What about ‘cookies?’*’.

If you subscribe to Cambridge Papers in order to receive printed copies delivered to a UK address

To enable us to manage our subscription service, we use an online application supplied by **MemberPress**. No personal information about subscribers is sent to MemberPress.com or its associated servers or providers. Instead, the personal data which subscribers provide falls into two types: subscription account information (‘**Account Information**’) and card payment details (‘**Payment Details**’) and these are processed differently as set out below.

Account Information

Your Account Information includes:

- your name, email address, postal address, and date of registration as a subscriber;
- in the case of concessionary rate subscriptions, you will submit supplementary information to verify your eligibility for the concessionary rate;
- a password, which together with your email address, allows you to access an online account to manage details such as change of address, early cancellation, and so on.

Your email address is used to create your subscription account and to send you information about your account and your subscription (e.g. payment receipts, password reset emails, renewal reminders).

Your Account Information is stored locally on the WordPress database associated with our website (www.cambridgepapers.org) which is provided and maintained by CPL’s web-hosting provider **krystal.uk** or any successor web hosting provider. For more information, please see the section below ‘*Who do we share your information with?*’

Payment Details

We accept payments through **Stripe.com** (hereafter '**Stripe**'). **Stripe** is an online payments handler by which subscription payments are collected every three months and then passed to CPL.

Some information is stored locally on our WordPress database provided and maintained by **krystal.uk** or any successor web hosting provider:

- Stripe Customer Number (cus_XXXXX...)
- Stripe Subscription Number (sub_XXXXX...)
- Transaction Charge Numbers (ch_XXXXX... or py_XXXXX...)
- User's IP address (which is visible to Stripe)
- Last 4 digits and expiration of subscriber's debit/credit card which is used for expiring card reminder emails.

Some information is sent to **Stripe**:

- Subscriber's first and last name
- Subscriber's email address
- Address
- Full debit/credit card information – Number, CVC, Expiration Date
- Subscriber's IP address.

For more information, please see the section below '*Who do we share your information with?*'

Integration of MemberPress with Mailchimp

It is possible to integrate the online facility provided by **MemberPress** with **Mailchimp** so that emails can be sent to all subscribers (but no one else) or all subscribers of a particular category (but no one else) via **Mailchimp**. We anticipate that we will make use of this integration at some point (or effect a manual integration of data) so that a subscriber's personal data (including name, email address, type of subscription, and whether or not the subscription is active) would be shared with, and recorded in, **Mailchimp**. For more information about **Mailchimp** and your personal data, please see the section below '*Who do we share your information with?*'

By completing and submitting a subscription form (whether for a standard subscription, Christian workers subscription, or student subscription), you consent to your personal information being collected and shared with and processed as indicated by this Privacy Policy:

- *by **krystal.uk** or an replacement web hosting provider we may engage;
- *(in respect of payment card details and information required to process payments) by **Stripe**; and
- *(if we effect an automatic or manual integration of the kind mentioned in the previous paragraph) **Mailchimp**.

In addition, your name and address being shared with and processed by any mail processing agent based in the UK which we may engage to despatch printed copies to subscribers.

If you make a donation

Some donors may wish to support us via Stewardship Services (UKET) Limited (**'Stewardship'**) and may access Stewardship's website via the link on our website. If you make a donation via Stewardship, your donation will be made to Stewardship and Stewardship will collect your data. We encourage you to read Stewardship's privacy policy. Each time a new donation is made via Stewardship, you will be given the opportunity to either share your contact information (name, email and address) with us or to keep the donation anonymous. If you share your contact details, we will retain and process personal information relating to you and your donation.

Some donors will prefer to support us with donations made directly to us by bank transfer, standing order or cheque and some of these donations will be supported by Gift Aid declarations. In such cases, we will retain and process personal information relating to donors and donations.

Through your direct contact with us

We collect personal data if and when you deal with us in any other way such as:

- Completing and returning a response form;
- Requesting information;
- Providing comments or suggestions;
- Signing up to attend an event;
- Making arrangements, if available, to receive printed copies of *Cambridge Papers*;
- Giving us in any other way than via our website your valid consent to send you our e-newsletter; or
- Contributing to our activities as a director, participant in the *Cambridge Papers* editorial group, author, employee, consultant, service provider, or volunteer, or as a member of CPL,

and you provide us with personal information.

It is important that the data that we hold about you is accurate and up to date. In the event that your personal information changes, please notify us so that we can update our records.

From publicly available information

We may from time to time collect information from Companies House, Charity Commission, and information published in articles, newspapers, websites, or blogs.

Non-personal data from website interaction with us

We collect non-personal data such as IP addresses, details of pages visited, and files downloaded. Website usage information collection involves the use of cookies: please see the 'Cookies Policy' on our website.

Links and Third Party Websites

Our website contains links which lead directly to other websites. This Privacy Policy does not cover external websites and we are not responsible for the privacy practices or content of those sites. We encourage you to read the privacy policies of any external websites you visit via links on our website.

What are the types of information we may collect, hold, use and share?

We may collect, hold, and use the following types of personal data:

- Identity data (such as forenames, last name, title);
- Personal characteristics (such as gender, nationality, country of residence, and age);
- Contact information (such as email address, address, and telephone numbers);
- Financial information (such as a record of donations, Gift Aid declarations made);
- Subscription eligibility information (if you take out a Christian workers subscription or student subscription, we will request additional information to seek assurance of your eligibility for such concessionary rate subscription);
- Qualitative information (such as feedback, comments, enquiries, or suggestions you make);
- Special category data (such information about your religious beliefs, race, or health).

We may share information we collect and hold to the extent and in the circumstances explained below: see '*Who do we share your information with?*'.

What do we do with your information?

We may use the personal data we collect:

- to send you our email newsletter ("e-newsletter") if you sign up to receive it;
- to keep you up to date with our work (including current and forthcoming issues of our quarterly publication, *Cambridge Papers*);
- to ask for financial and non-financial support (such as prayer);
- to process donations which you give us;
- to process Gift Aid claims with HM Revenue & Customs;
- to maintain contact with subscribers and communicate with you about your subscription;
- to maintain contact with donors;
- to provide information about events and resources which we believe may interest readers of *Cambridge Papers*;
- to keep records of your relationship with us, for example, questions you have asked or suggestions you have made;
- to classify readers and/or supporters by location (for example, UK or overseas);
- to supply printed copies of our quarterly publication, *Cambridge Papers*, to those who subscribe to receive such printed copies (or, in selected cases, are persons with whom we have made separate arrangements to deliver the same);
- to conduct surveys or distribute questionnaires to assess our readers' response to our publications and to invite suggestions; and
- to establish contact with and initiate conversations about ways in which you might be able to contribute to the work of *Cambridge Papers*.

The legal basis for processing your personal data

The personal data to which this Privacy Policy relates is processed on the following basis:

Consent

E-newsletter: We rely on your consent to your personal data being processed on our behalf by **Mailchimp**. Save as set out below, we send our e-newsletter only to those persons who have signed up to the e-newsletter and who have, accordingly, given their consent. You may 'unsubscribe' at any time.

Subscriptions: We rely on your consent to your personal data being processed on our behalf by **our** web hosting provider and **Stripe** and (if applicable) **Mailchimp**.

In the case of personal information of e-newsletter recipients processed by **Mailchimp** and subscriber information stored by our web hosting provider on the WordPress database associated with our website, we may keep duplicate records on the basis of our legitimate interests.

Legitimate interest

In other cases, we process your personal information on the basis that it is in our legitimate interest to do so (and such legitimate interest is not outweighed by your rights and interests).

Legal obligation

Finally, there may arise some circumstances in which we process your personal data to comply with applicable laws or regulations.

Storing your data

We will 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, tax, or reporting requirements. We hold your data for varying lengths of time depending on the type of information in question but in doing so we always comply with Data Protection legislation. Details of retention periods are available in our retention policy which you can request by contacting us in writing at:

Data Compliance Manager
Cambridge Papers Limited
51 Roseford Road
Cambridge
CB4 2HA

Or by email to: admin@cambridgepapers.org .

Security of your data

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 directors, employees, self-employed personnel, or volunteers whose job roles require such access. They will only process your personal data on our

instructions. If any suspected personal data breach occurs, we will notify you and the Information Commissioner's Office if we are legally required to do so.

Who do we share your information with?

We will not transfer your contact details to other organisations for their marketing purposes.

We will, with your consent, share your personal information to **Mailchimp**, **Krystal.uk** (or any successor web hosting provider), **Stripe**. As **Stripe** is an online payments processor, some data submitted by you is sent only to **Stripe** and not accessible by us (see above). Here is some more information on the terms on which these organisations process your data:

(a) Mailchimp

If you sign up to our e-newsletter, you consent to your personal information being collected on our behalf by (and shared with) **Mailchimp** whose online products and services we use to maintain our e-newsletter mailing list and to distribute our e-newsletter. Since **Mailchimp** is based outside the European Economic Area (EEA), your data may be processed outside the EEA. Your attention is drawn to **Mailchimp's Global Privacy Statement** (available [here](#)). Our relationship with **Mailchimp** is governed by **Mailchimp's Terms of Use** (available [here](#)) which incorporate a **Data Processing Addendum** (available here: [here](#)). Furthermore, your attention is drawn to section 'What about 'cookies'?' below which comments on the use of 'cookies' by **Mailchimp** in emails sent out by us using their services.

(b) Krystal.uk

The services of **krystal.uk** are provided to CPL pursuant to Terms and Conditions (available [here](#)) (see clause 11 for the Data Processing Agreement which governs their role as a data processor). If we change web hosting provider, we will supply similar information for our new web hosting provider.

(c) Stripe

If you subscribe to receive printed copies of *Cambridge Papers*, or make an online donation to CPL, you consent to your personal information (including payment card details for the purposes of making subscription payments or online donations) being collected on our behalf by **Stripe**.

Stripe is an online payments handler (www.stripe.com) by which such payments or donations are collected every three months and then passed to CPL. Since **Stripe** has its headquarters outside the European Economic Area (EEA), your data will or may be processed outside the EEA. Your attention is drawn to **Stripe's Privacy Policy** (available [here](#)). Our relationship with **Stripe** is governed by the **Stripe Services Agreement** (available [here](#)) which incorporates a **Data Processing Addendum** (available [here](#)).

We will not otherwise, except with your consent, supply your personal data to any third party outside CPL save as set out below:

- We may engage third party agents to undertake on our behalf tasks which form part of our activities and, if so, we will share the information required to carry out such tasks. Such tasks

may include: printing and circulating printed newsletters; distributing printed copies of *Cambridge Papers*; or processing Gift Aid claims. These agents will be bound by contract to protect your data and we remain responsible for the storing and processing of your personal data;

- We will engage third party accountants to prepare our end of year accounts and, if required, a corporation tax return and, to the extent reasonably necessary or desirable for such purposes, we may transfer your personal data to such accountant to enable such accountant to fulfil those responsibilities;
- Finally, we may need to pass on your information if we are required to do so by law or by a regulatory body.

Your rights in relation to your personal data

Under data protection legislation, you have several rights which may be summarised as follows:

- the right to be informed about how your personal data is being used;
- the right of access to your personal data and to ask for a copy of the personal information held about you;
- the right to rectification to correct or complete personal data;
- the right to restrict processing pending its verification or correction;
- the right to data portability and request your data in a format that can easily be transferred to another data controller;
- the right to object to data processing in various circumstances (including direct marketing);
- the right to be informed about, and object to, automated decision making.

You can read more about your rights on the website of the Information Commissioner's Office (see, in particular, the information available [here](#)).

Where we rely on your consent to process information (for example, in order to send you our e-newsletter), you have the right to withdraw consent (In relation to our e-newsletter, you can do so by using the 'unsubscribe' facility in any e-newsletter we send you).

If you have a concern about the way we are handling your personal data, please raise your concern with us in the first instance or, if you prefer directly, to the Information Commissioner's Office at <https://ico.org.uk/make-a-complaint/> .

What about 'cookies'?

Please see our 'Cookies Policy' which explains our use of cookies on our website and which can be found on our website (www.cambridgepapers.org).

If you sign up to our e-newsletter, you consent to the use of cookies placed by **Mailchimp** in emails we distribute to you using **Mailchimp's** services. We set out below a paragraph from **Mailchimp's Cookie Statement** (available [here](#)) which explains such use of 'cookies' in emails sent out using **Mailchimp's** services:

*"We [i.e. **Mailchimp**] automatically place single pixel gifs, also known as web beacons, in every email sent by our Members [e.g. CPL]. These are tiny graphic files that contain unique identifiers that enable us and our Members to recognize when their Contacts have opened an email or clicked certain links. These technologies record each Contact's email address, IP address, date, and time associated with*

each open and click for a campaign. We use this data to create reports for our Members about how an email campaign performed and what actions Contacts took.”

Contacting us regarding your personal data

If you would like to contact us in relation to our handling of your personal data, or any of your rights in respect of your personal data, please contact:

Cambridge Papers Limited
51 Roseford Road
Cambridge
CB4 2HA

Tel: 01223 704986

Email: admin@cambridgepapers.org

Changes to our Privacy Policy

We may amend our Privacy Policy from time to time to take account of changes to our processes or changes in law. You may wish to check the Privacy Policy on our website if and when you submit any personal information. If we make any significant changes, we will draw attention to such changes on our website and, if appropriate, in our e-newsletter. By continuing to use our website, you will be

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APPENDIX

Key definitions

‘Controller’ means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data;

‘Processing’ means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

‘Personal data’ means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.