



PRIVACY NOTICE
INTERNATIONAL SOCIETY FOR KRISHNA CONSCIOUSNESS
BHAKTIVEDANTA MANOR

This privacy notice contains important information on who we are, how and why we collect, store, use and share personal information which you give to us or any that we may collect from or about you, your rights in relation to your personal information and how to contact us and the UK supervisory authority in the event you have a complaint.

ISKCON is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you in accordance with the General Data Protection Regulation (GDPR).

Who we are

The International Society for Krishna Consciousness Limited (registration number ZA097058) which includes ISKCON Bhaktivedanta Manor are responsible for any personal data that you give to us, or any that we may collect from or about you. References in this Notice to “we” or “us” are to the entities listed.

Each of the listed entities are committed to protecting your privacy and are joint data controllers within the meaning of data protection laws applicable in the European Union (EU) and European Economic Area (EEA).

As joint data controllers, we have arrangements between us to ensure that we handle your personal data correctly and in accordance with data protection law. This arrangement reflects our respective roles and responsibilities in relation to you and considers which entity is in the best position to fulfil each obligation to you. This arrangement between us does not affect your rights under data protection law. For more information on these arrangements, feel free to contact us as set out under “Contacting Us” below.

This privacy notice lets you know what happens to any personal data that you give to us, or any that we may collect from or about you.

When we ask you for personal data, we will:

- tell you why we need it
- only ask for relevant information
- look after it and make sure it is only accessible to those within ISKCON who need to see it
- only keep it for as long there is a charitable, statutory or legal obligation (according to our retention policy)
- not to make your personal information available to third parties without your permission.

In return, we ask you to:

- give us accurate information, and
- tell us as soon as possible if there are any changes

1. What kinds of personal data do we process about you?

We will process some or all of the following where necessary to perform our tasks:

- Names, titles, and spiritual names, aliases, photographs;
- Contact details such as telephone numbers, addresses, and email addresses;
- Where they are relevant to our charitable objects, or where you provide them to us, we may process demographic information such as gender, age, date of birth, marital status, nationality, education/work histories, academic/professional qualifications, hobbies, family composition, and dependants;
- Where you make donations or pay for activities such as use of our wedding services, financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers;
- The data we process is likely to constitute sensitive personal data because, as a religious charity, the fact that we process your data at all may be suggestive of your religious beliefs. Where you provide this information, we may also process other categories of sensitive personal data: racial or ethnic origin, sex life, mental and physical health, details of injuries, medication/treatment received, political beliefs, biometric data, data concerning sexual orientation and criminal records, fines and other similar judicial records

2. How do we process your personal data?

ISKCON will comply with its legal obligations to keep personal data up to date; to store and destroy it securely; to not collect or retain excessive amounts of data; to keep personal data secure, and to protect personal data from loss, misuse, unauthorised access and disclosure and to ensure that appropriate technical measures are in place to protect personal data.

We use your personal data for some or all of the following purposes:

- To enable us to meet all legal and statutory obligations;
- To carry out comprehensive safeguarding procedures (including due diligence and complaints handling) in accordance with best safeguarding practice from time to time with the aim of ensuring that all children and vulnerable adults are provided with safe environments;
- To offer spiritual guidance, mentoring and provide you with pastoral and spiritual care (such as visiting you when you are gravely ill or bereaved) and to organise and perform Vedic religious ceremonies and/ *samskara* services for you, such as birth *samskaras*, initiations, weddings and funerals;
- To deliver ISKCON's mission to our community, and to carry out any other voluntary or charitable activities for the benefit of the public as provided for in our constitution or governing document;
- To administer our devotee and/or residents records;
- To fundraise and promote the interests of ISKCON;
- To maintain our own accounts and records;
- To process a donation that you have made (including Gift Aid information);
- To seek your views or comments;
- To notify you of changes to our services, events, including all scheduled and unscheduled (that is, not appearing on our published calendars) Hare Krishna festivals, and changes to members on our Temple Management, Trustees and Governing Body Commission;

- To send you communications which you have requested and that may be of interest to you. These may include information about campaigns, appeals, other fundraising activities;
- To process a grant or application for a role;
- To enable us to provide a voluntary service for the benefit of the public in a particular geographical area as specified in our constitution;
- Our processing also includes the use of CCTV systems for the prevention and prosecution of crime.

3. What is the legal basis for processing your personal data?

Most of our data is processed because it is necessary for our legitimate interests, or the legitimate interests of a third party (such as our Governing Body Commission). An example of this would be our safeguarding work to protect children and vulnerable adults. We will always take into account your interests, rights and freedoms.

Some of our processing is necessary for compliance with a legal obligation.

We may also process data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract. An example of this would be processing your data in connection with our wedding services.

Religious organisations are also permitted to process information about your religious beliefs to administer membership or contact details.

Where your information is used other than in accordance with one of these legal bases, we will first obtain your consent to that use.

4. Sharing your personal data

Your personal data will be treated as strictly confidential. It will only be shared with third parties where it is necessary for the performance of our tasks or where you first give us your prior consent. It is likely that we will need to share your data with some or all of the following (but only where necessary):

- Our agents, and contractors. For example, we may ask a commercial provider to send out newsletters on our behalf, or to maintain our database software;
- On occasion, with other ISKCON centres in the UK with which we are carrying out joint events or activities.

How long do we keep your personal data?

We will keep some records permanently if we are legally required to do so. We may keep some other records for an extended period of time. For example, it is current best practice to keep financial records for a minimum period of 7 years to support HMRC audits. In general, we will endeavour to keep data only for as long as we need it. This means that we may delete it when it is no longer needed.

Your rights and your personal data

You have the following rights with respect to your personal data:

When exercising any of the rights listed below, in order to process your request, we

may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.

1. The right to access information we hold on you
 - At any point you can contact us to request the information we hold on you as well as why we have that information, who has access to the information and where we obtained the information from. Once we have received your request we will respond within one month.
 - There are no fees or charges for the first request but additional requests for the same data may be subject to an administrative fee .
2. The right to correct and update the information we hold on you
 - If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated.
3. The right to have your information erased
 - If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase the data we hold.
 - When we receive your request we will confirm whether the data has been deleted or the reason why it cannot be deleted (for example because we need it for our legitimate interests or regulatory purpose(s)).
4. The right to object to processing of your data
 - You have the right to request that we stop processing your data. Upon receiving the request we will contact you and let you know if we are able to comply or if we have legitimate grounds to continue to process your data. Even after you exercise your right to object, we may continue to hold your data to comply with your other rights or to bring or defend legal claims.
5. The right to data portability
 - You have the right to request that we transfer some of your data to another controller. We will comply with your request, where it is feasible to do so. We will inform you if we are unable to comply with this request.
6. The right to withdraw your consent to the processing at any time for any processing of data to which consent was sought.
 - You can withdraw your consent easily by telephone, email, or by post (see Contact Details below).
7. The right to object to the processing of personal data where applicable.
8. The right to lodge a complaint with the Information Commissioner's Office.

Transfer of Data Abroad

In some cases the personal data we collect from you may also be processed outside the European Economic Area (EEA) and such destinations may not have laws which protect your personal data to the same extent as in the EEA. We have obligations to ensure that your personal data processed by us or by ISKCON centres outside the EEA is treated securely and is protected against unauthorised access, loss or destruction, unlawful processing and any processing which is inconsistent with the purposes set out in this Notice.

Further processing

If we wish to use your personal data for a new purpose, not covered by this Privacy Notice, then we will provide you with a new notice explaining this new use prior to

commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

Contacting Us

Please contact the Data Protection Officer, if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact our Data Protection Officer, please send an email to dpo@krishnatemple.com, or write to: The DPO, Yogendra Sahu, Bhaktivedanta Manor Hilfield Lane, Aldenham, Herts WD25 8EZ.

Please contact us if you have any questions about this Privacy Notice or the personal information we hold about you or to exercise all relevant rights, queries or complaints. The [General Data Protection Regulation](#) also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113 or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Changes to this privacy notice

This privacy notice was published on 24 May 2018.

We may change this privacy notice from time to time.