



## General Privacy Notice

### *Your personal data – what is it?*

“Personal data” is any information about a living individual, which allows them to be identified from that data (for example a name, date of birth, photographs, videos, email address, or address). Identification can be by the information alone or in conjunction with any other information. The activities of The Hamilton Seventh Day Adventist Church (Hamilton SDA), pertaining to the collection, use, sharing and retention of data, are governed by the Bermuda Personal Information Protection Act, 2016.

### *Who are we?*

This Privacy Notice is provided to you by the Hamilton Seventh Day Adventist Church (Hamilton SDA) which is the data controller for your data. The Bermuda Conference of Seventh Day Adventist is made up of a number of different congregations, and ministries who work together to deliver the Church’s mission throughout our community. Hamilton SDA works together with:

- Bermuda Institute (Pre-K -12 Institution)
- Adventist Bookstore; and
- the Bermuda Conference of Seventh Day Adventist Head Office.

As the Church is made up of all of these persons and organizations working together, we may need to share personal data we hold with them so that they can carry out their responsibilities to the Church and our community. The organizations referred to above are joint data controllers. This means we are all responsible to you for how we process your data.

Each of the data controllers have their own tasks within the Church and a description of what data is processed and for what purpose is set out in this Privacy Notice. This Privacy Notice is sent to you by Hamilton Seventh Day Adventist on our own behalf and on behalf of each of these data controllers. In the rest of this Privacy Notice, we use the word “we” to refer to each data controller, as appropriate.

### *What data do the data controllers listed above process?*

They will process some or all of the following where necessary to perform their tasks:

- Names, titles, and aliases, photographs, videos, live stream;
- Contact details such as telephone numbers, addresses, and email addresses;



- Where they are relevant to our mission, 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 dependents;
- Where you make donations or pay for activities such as use of Hamilton SDA and or the Youth Center, financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers;
- The data we process is likely to constitute sensitive personal data because, as a church, the fact that we process your data at all may be suggestive of your religious beliefs.

## *How do we process your personal data?*

The data controllers will comply with their 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, unauthorized 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 (which include maintaining and publishing our church membership list in accordance with the General Conference of Seventh Day Adventist; as laid out in the SDA Church Manual 21st edition, Revised Oct 2025.
- 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 adults-at-risk are provided with safe environments;
- To minister to you and provide you with pastoral and spiritual care (such as visiting you when you are gravely ill or bereaved) and to organize and perform clerical services for you, such as baptisms, confirmations, weddings and funerals;
- To deliver the Church'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 the constitution and statutory framework of each data controller;
- To administer the local congregation, local conference, union and general conference membership records;
- To fundraise and promote the interests of the Church and charity;
- To maintain our own accounts and records;
- To process a donation that you have made;



- To seek your views or comments;
- To notify you of changes to our services, events and role holders;
- 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.

## *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 another organization in the Bermuda Conference of Seventh Day Adventist). An example of this would be our safeguarding work to protect children and adults at risk. We will always take into account your interests, rights and freedoms.

Some of our processing is necessary for compliance with 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 the hire of church facilities.

Religious organizations 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 these legal bases, we will first obtain your consent to that use.

## *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):

- The appropriate bodies of Hamilton SDA including the other data controllers;
- 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;
- Other clergy or lay persons nominated or elected by Hamilton SDA to support the mission of the Church. For example, our clergy are supported by elders, and bible workers, who may provide confidential mentoring and pastoral support. Assistant or temporary ministers, including deacons, lay ministers, and elders with the Senior Pastors permissions may participate in our mission in support of our regular ministry;



- Other persons or organizations operating within the Bermuda Conference including, where relevant, the Bermuda Institute School Board and Superintendent, and Subsidiary Bodies;
- There may be other legal entities we share data with within the Bermuda Conference who are also data controllers;
- On occasion, other churches with which we are carrying out joint events or activities.

## *How long do we keep your personal data?*

We will keep some records permanently. We may keep some other records for an extended period of time. In general, we will endeavor to keep data only for as long as we need it. This means that we may delete it.

## *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 requests, 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.
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 processing 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, within one month of receiving your 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 Bermuda Privacy Commissioner's Office.

### *Transfer of Data Abroad*

Any electronic personal data transferred to countries or territories outside of Bermuda will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts. Our website is also accessible from overseas so on occasion some personal data may be accessed from overseas.

### *Further Processing*

If we wish to use your personal data for a new purpose, not covered by this 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.

### *Contact Details*

If you have any questions about this Privacy Notice or the information we hold about you or to exercise all relevant rights, queries or complaints, please contact our Senior Pastor: W. DeJaun Tull on (441) 292-4276; [hamiltonsda@gmail.com](mailto:hamiltonsda@gmail.com) or Hamilton Seventh Day Adventist Church P.O. Box 415 Hamilton HM BX