# **Privacy Policy**

At ChurchDesk we respect the privacy rights of our users and do recognize the importance of protecting the personal information of our users. This Privacy Policy applies to various ChurchDesk services such as our Website, any ChurchDesk email and any associated service connected to this website. An associated service is for instance the newsletter service we are offering on the website.

Our Privacy Policy is designed to help you understand what information we collect and how we use and share that information. This Privacy Policy governs our data collection, processing and usage practices. It also describes your choices regarding use, access and correction of your personal information. If you do not agree with the data practices described in this Privacy Policy, you should not use the Website or any other connected service. As a User of the SubscriptionService, as defined in the Terms of Service, your personal information is protected by the Data Processing Agreement.

# 1. Definitions and legal references

# 1.1. Personal Data (or Data)

Any information regarding a natural person, a legal person, an institution or an association, which is, or can be identified, even indirectly, by reference to any other information, including a personal identification number.

### 1.2. Usage Data

Information collected automatically from this Application (or third party services employed in this Application ), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Application, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

#### 1.3. User

In this Privacy Policy the user is defined as the individual visiting this website or any associated service connected to this website, such as Newsletters and any ChurchDesk email. In case that the user is both a visitor of this website and user of ChurchDesk, as set forth in the "Terms of Service", ChurchDesk will also act as a Data Processor, based on the instructions set forth in the Data Processing Agreement.

# 1.4. Data Subject

The legal or natural person to whom the Personal Data refers to.

#### 1.5. Data Processor

The natural person, legal person, public administration or any other body, association or organization authorized by the Data Controller to process the Personal Data in compliance with this privacy policy.

# 1.6. Data Controller (or Owner)

The natural person, legal person, public administration or any other body, association or organization with the right, also jointly with another Data Controller, to make decisions regarding the purposes, and the methods of processing of Personal Data and the means used, including the security measures concerning the operation and use of this Application. The Data Controller, unless otherwise specified, is the Owner of this Application.

## 1.7. This Application

The hardware or software tool by which the Personal Data of the User is collected. The ChurchDesk Website, the ChurchDesk email and any other connected service, is according to this Privacy Policy defined as an Application.

#### 1.8. Cookie

A small piece of data stored in the User's device.

### 1.9. Legal information

Notice to European Users: This privacy statement has been prepared in fulfillment of the obligations under the General Data Protection Regulation, Directive 2016/679, on the subject of information to be provided where personal data are collected from the data subject, and under the provisions of Directive 2002/58/EC, as revised by Directive 2009/136/EC, on the subject of Cookies.

### 2. Owner

ChurchDesk ApS, Nørrebrogade 45E, 2200 Copenhagen N, Denmark. Company register number: DK32150489.

The Owner of this application is not the Data Controller in the instances where the Owner acts as a Data Processor on behalf of a Data Controller as defined in the Data Processing Agreement. In the Data Processing Agreement the Owner is defined as the Data Processor.

# 3. Types of Data collected as a Data Controller

This section provides you with information about the personal data that ChurchDesks collects as a Data Controller.

Among the types of Personal Data that ChurchDesk collects as a Data Controller, by itself or through third parties, there are: Cookies, Usage Data and Emails.

Other Personal Data collected may be described in other sections of this privacy policy or by declaration of consent and through a dedicated explanation text contextually with the Data collection.

The Personal Data may be freely provided by the User, or collected automatically when using this Application.

Any use of Cookies – or of other tracking tools – by this Application or by the owners of third party services used by this Application, unless stated otherwise, serves to identify Users and remember their preferences, for the sole purpose of providing the service required by the User.

Failure to provide certain Personal Data may make it impossible for this Application to provide its services.

No special category data is collected by the website or any other application used in connection with the website.

The User assumes responsibility for the Personal Data of third parties published or shared through this Application and declares to have the right to communicate or broadcast them, thus relieving the Data Controller of all responsibility imposed on the use of this application through third parties.

### 3.1. Mode and place of processing the Data

#### 3.1.1. Methods of processing

We collect publicly available data about prospects and customers with the purpose of calling customers to inform them about campaigns that might be of interest to them.

The Data Controller processes the Data of Users in a proper manner and shall take appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Data Controller, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of the site (administration, sales, marketing, legal, system administration) or external parties (such as third party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Data Controller at any time.

#### 3.1.2. Place

The Data is processed at the Data Controller's operating offices and in any other places where the parties involved with the processing are located. For further information, please contact the Data Controller.

#### 3.1.3. Retention time

The Data is kept for the time necessary to provide the service requested by the User, or stated by the purposes outlined in this document, and the User can always request that the Data Controller suspend or remove the data.

All unused publicly available data will be deleted after 14 months.

It is always possible to be deleted from our database. Please contact us on <a href="mailto:support@churchdesk.com">support@churchdesk.com</a>, if you want to be deleted from our database.

#### 3.1.4. The use of the collected Data

The Data concerning the User is collected to allow the Application to provide its services, as well as for the following purposes: Analytics, Contacting the User, Interaction with external social networks and platforms, Content commenting, Registration and authentication, Access to third party services' accounts, Handling payments, Interaction with support and feedback platforms, Infrastructure monitoring, Traffic optimization and distribution, Interaction with live chat platforms, Remarketing and

Behavioral Targeting, Managing email addresses and sending messages and Displaying content from external platforms.

We may also use your email address to send you announcements and information about other products or services (including third party services) that you may be interested in (together, the "Marketing Messages"). You may opt-out of receiving Marketing Messages at any time by following the instructions provided in the Marketing Message.

#### 3.2. Further details on the collection of Personal Data

Data is collected by using the following services:

Name	Description of data processing
CrispChat	Ticket and chat function. Used when contacting <a href="mailto:support@churchdesk.com">support@churchdesk.com</a> .
Hubspot	ChurchDesk Marketing and CRM (customer relationship management) system.
Google Workspace (Google G Suite)	E-mail provider for our employees.
Aircall	VoIP phone software.
Livestorm	Software for webinars.
Webflow	Website provider.
Matomo	Website analysis.
Better Stack	Operational status on the ChurchDesk Platform: https://status.churchdesk.com/

#### 3.2.1. Data Processing in third countries

Personal data is only transferred to third countries when the data processor guarantees that appropriate safeguards have been implemented in accordance with the standard contractual clauses of the EU General Data Protection Regulation .

# 3.3. Additional information about data collection and processing

#### 3.3.1. Legal Action

The User's Personal Data may be used for legal purposes by the Data Controller, in Court or in the stages leading to possible legal action arising from improper use of this Application or the related services.

The User is aware of the fact that the Data Controller may be required to reveal personal data upon request of public authorities.

#### 3.3.2. Additional information about User's Personal Data

In addition to the information contained in this privacy policy, this Application may provide the User with additional and contextual information concerning particular services or the collection and processing of Personal Data upon request.

#### 3.3.3. System Logs and Maintenance

For operation and maintenance purposes, this Application and any third party services may collect files that record interaction with this Application (System Logs) or use for this purpose other Personal Data (such as IP Address).

#### 3.3.4. Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time.

#### 3.3.5. The rights of Users

Users have the right, at any time, to know whether their Personal Data has been stored and can consult the Data Controller to learn about their contents and origin, to verify their accuracy or to ask for them to be supplemented, cancelled, updated or corrected, or for their transformation into anonymous format or to block any data held in violation of the law, as well as to oppose their treatment for any and all legitimate reasons. Requests should be sent to the Data Controller at the contact information set out above.

This Application does not support "Do Not Track" requests.

#### 3.3.6. Changes to this privacy policy

The Data Controller reserves the right to make changes to this privacy policy at any time by giving notice to its Users on this page. It is strongly recommended to check this page often, referring to the date of the last modification listed at the top. If a User objects to any of the changes to the Policy, the User must cease using this Application and can request that the Data Controller erase the Personal Data. Unless stated otherwise, the then-current privacy policy applies to all Personal Data the Data Controller has about Users.

# 4. Data Processing Agreement

Please visit the "Data Processing Agreement" for more information on ChurchDesk as a Data Processor. ChurchDesk is a Data Processor in the instances that the ChurchDesk User is using a Subscription Service, as defined in the ChurchDesk "Terms of Service".

# 5. Data Security

Please visit the Data Security section made available on this homepage to understand the security measures implemented by ChurchDesk. The security measures ensure state of the art protection of the ChurchDesk Users personal data.