WTC PRIVACY NOTICE

JANUARY 2026

WTC Privacy Notice	
Purpose	To explain how WTC collects, stores and processes your personal data, including data which you provide to WTC or which WTC has collected from third parties.
Enquiries	Enquiries about the Privacy Notice should be directed to the Data Protection Lead (dataprotection@wtctheology.org.uk).
UKPRN	10030973
Legal Address	16-17 Clarence Parade, Cheltenham, GL50 3PA
Author	Forti5 (https://www.forti5.tech/)
Approved by	WTC Board of Trustees
Next Review	October 2026
Staff member responsible for update	Data Protection Lead as advised by Forti5 (https://www.forti5.tech/)

1. INTRODUCTION

This Privacy Notice is issued on behalf of Westminster Theological Centre (WTC). References to “we”, “us" or “our” in this Privacy Notice relate to how WTC is responsible for processing your data.

WTC is a charity registered in England and Wales, (Charity number 1123573), and a company limited by guarantee, (Company number 6506007). Our website is owned and operated by WTC whose registered address is:

16-17 Clarence Parade
Cheltenham
Gloucestershire
GL50 3PA

The Trustees of WTC are the Data Controllers and are responsible for general data protection matters and complaints arising with respect to day-to-day matters.

WTC has appointed a Data Protection Lead who is responsible for overseeing questions in relation to this Privacy Notice. Queries related to data protection should be directed to the Data Protection Lead. (Section 15: How to Contact Us.)

The purpose of this Privacy Notice is to give you information on how WTC collects and processes your personal data which, either you have provided to us, or we obtain. This Notice applies to the personal information we collect about you directly or that we collect from third parties.

The Privacy Notice sets out:

- What information we collect, and from whom
- How we use that information
- Student Data
- Alumni
- Direct Marketing
- Lawful Basis
- How long we keep your data
- How your information is protected
- How we share your data
- International transfers of personal data
- Cookies
- How you can control your data
- Summary of your rights in relation to the information we hold about you
- Contact Us
- How to complain

The website is not intended for children, and we do not knowingly collect data relating to children.

2. WHAT DATA DO WE COLLECT?

We collect the personal information you give us when you:

- provide us with your contact details such as name, address, email address, phone numbers, date of birth and gender
- become a Patron
- leave a legacy
- correspond with us
- sign up for free resources
- apply to be a student
- attend an event or Hub Open Evenings
- provide financial information to us including about donations, fundraising and gift aid
- order products and services from us
- use our products, services and website
- provide a testimonial or a review on our website
- communicate with or contact us
- enter any of our surveys
- interact with us on social media platforms
- sign up to one of our newsletters or other communications
- request a call back through our website.

When we request information from you, this will be explained in the relevant forms or pages, or over the telephone. You may choose to provide additional information when you interact with us or to a third party who refers you to us. We store customer feedback and information on our customer databases.

We will collect data you give us when you apply for a job with WTC. This may include:

- your bank account details and tax and residency status
- references from previous employers or educational institutions
- contact details for you and any next of kin
- your qualifications
- information concerning your health and medical conditions
- information about your race, ethnicity, and sexual orientation
- details of unspent criminal convictions.

2.1. Special Category Data

Where data processing relates to Special Categories of Data the following processing conditions apply:

- Explicit Consent has been given by the data subject
- Processing is necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement.

2.2. Social Media Users

We use social media channels (including Facebook, WhatsApp, Vimeo and

Instagram, the "Social Media Companies") to publish information about the charity. If you follow or otherwise engage with our social media channels, we will collect Usage Data to analyse how users interact with those channels. If you use social media to send us messages or posts, we may use your Profile Data to communicate with you. When you interact with our channels, the Social Media Companies will also process your personal data for the purposes set out above as Joint Controllers. For more information, we would encourage you to review the privacy notices published by the Social Media Companies.

3. HOW DO WE USE YOUR DATA?

All personal data is stored securely in accordance with the DPA 2018 (the UK's General Data Protection Regulation). We use your data to provide the best possible products and services to you.

This includes:

- providing and managing your access to our site
- administering and managing our relationship with you, such as responding to communications
- personalising and tailoring your experience on our site.
- supplying our programmes of study
- responding to communications from you
- sending transactional and service messages in relation to an event
- analysing your use of our site and gathering feedback to enable us to continually improve our site and your user experience
- complying with legal or regulatory requirements
- helping us establish, exercise, or defend legal claims
- producing statistical returns e.g. for HESA,[1] research and statistical analysis and to meet statutory or other obligations.

In some cases, the collection of data may be a statutory or contractual requirement, and we will be limited in the products and services we can provide you without your consent for us to be able to use such data.

4. PROCESSING OF ADDITIONAL PERSONAL DATA FOR STUDENTS

All personal data is stored securely in accordance with the DPA 2018 (the UK's General Data Protection Regulation). We use your data to:

- deliver and administer your enrolment, including complying with the UK immigration regulations, education, record the details of your studies and determine/confirm your academic achievements (e.g. results)
- administer the financial aspects of your relationship with us and manage the granting of bursaries and other discretionary payments
- administer student related policies and procedures including appeals, complaints, grievances and disciplinary matters. Provide you with any additional support you may require based on your identified needs

[1] Office for Students Higher Education Statistics Agency

- film and record certain lectures. Please note that students are not the subject of these recordings, although they may be visible and any discussion between lecturers and students as part of the activity may be recorded
- administer student numbers, including your student ID number for HESA
- register you with our validating university
- facilitate the use of our College Data Management System (CDMS) to access learning modules and submit assignments including uploading your photograph
- so you can participate, if you so agree, in approved market research activities (e.g. surveys, focus groups, workshops) about your WTC experience, including the National Student Survey
- receive communications about our community, your studies and your experience as a student
- continue your relationship with us following your study (further information is shown below for Alumni)
- fulfil our legal obligation to respond to Freedom of Information requests. Information will be redacted before disclosure to reduce the risk of any individuals being identifiable from it
- provide information and data for publications about us, which will be redacted to reduce the risk of any individuals being identifiable from it unless you consent to be identified.

5. ALUMNI

The information we hold comes directly from our alumni. We will use alumni details to manage alumni interaction with us and to contact alumni by post, email, phone, text and/or social media, complying with any preferences alumni have expressed. We contact alumni to:

- keep alumni informed of WTC news, and the achievements and advances being made by the WTC, its students, staff, and alumni
- inform you about the benefits of being an alumnus/a of the WTC, including discounts and services
- invite you to events hosted by WTC, partner organisations, or your fellow alumni (for example reunions)
- offer opportunities for you to engage with WTC as an ambassador, volunteer, friend and supporter. This may include asking you for your financial support through making a gift to one of the projects which help to deliver WTC's mission of creating and sharing knowledge, or asking you to give your time to help students.

6. DIRECT MARKETING

We may, from time to time, supply you with email newsletters, alerts etc. that you have subscribed to. (You may unsubscribe or opt-out at any time by clicking the 'unsubscribe' link in the email or by contacting Us. (Section 15: How to Contact Us).

Once you have submitted your preference to us, we may use these for marketing,

which may include contacting you by email, telephone, or text message with information, news and offers on our products and services. We will not, however, send you unsolicited marketing or spam, and will take all reasonable steps to ensure that we fully protect your rights and comply with our obligations under the DPA 2018, GDPR, and the Privacy and Electronic Communications Regulations.

7. LAWFUL BASIS

Under GDPR, we will ensure that your personal data is processed lawfully, fairly, and transparently, without adversely affecting your rights. We will only process your personal data if at least one of the following applies:

- You have given consent to the processing of your personal data for one or more specific purposes
- Processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract
- Processing is necessary for compliance with a legal obligation to which we are subject
- Processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by the fundamental rights and freedoms of the data subject which require protection of personal data.

We rely on our legitimate interests for the following reasons:

- Keeping our records up to date
- Developing, marketing and charging for our products and services
- Running our websites and keeping them safe and secure
- Presenting our content and communications in the most effective and sustainable manner for you and your devices
- Helping you use our websites, including obtaining products or services
- Measuring how you use our websites and improving their content and accessibility
- Measuring and understanding how effective our marketing is
- Complying with legal and or regulatory requirements
- Identifying student trends
- Understanding products, services and the student experience
- Providing insight and analysis into how our social media channels are used and how they are performing.

8. HOW LONG DO WE KEEP YOUR DATA?

Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

Our retention of your personal data is linked to your actions. Unless a longer retention period is required or permitted by law, we will only hold your personal information on our systems for the period necessary to fulfil the purposes outlined

in this Notice, or until you request that the information be deleted (Section 14: Summary of your rights).

In some instances, we may need to send your information to third parties outside the UK. You are deemed to accept and agree to this by using our site and submitting information to us. If we do store or transfer data outside the EEA, we will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the EEA and under the UK GDPR. Such steps may include, but not be limited to, the use of legally binding contract terms between us and any third parties.

Even if you ask us to delete your personal information, we reserve the right to retain your personal data where such retention is necessary for compliance with a statutory obligation, (for example to maintain a copy for legal, tax or regulatory purposes). In such an event, we will do so only as long as necessary to fulfil those statutory obligations.

9. HOW DO WE PROTECT YOUR DATA?

Data security is of great importance to us, and to protect your data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure data collected through our site.

All your data is stored electronically in a secure database or a locked filing cabinet, and can only be accessed by authorised people. All users of our system are trained in GDPR.

Where we engage third parties to process personal data on our behalf, they do so upon writing, and are contracted to implement appropriate technical and organisational measures to ensure the security of data.

10. HOW DO WE SHARE YOUR DATA?

We are committed to not sharing your data, and will only do this if it is in your legitimate interest to ensure we provide you with the support and information required to make an informed decision about a service(s) or product(s).

We will not sell your data to any unconnected third parties.

We may contract with third parties to supply products and services to you on our behalf. These may include payment processing and search engine facilities.

We may share your information within WTC for research and analysis.

In some cases, third parties may require access to some or all of your data. Where any of your data is required for such a purpose, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under the law.

We currently contract with:

Third party name	Used for	Privacy notice
WTC Consulting Ltd	Student Management System	https://wtc-consulting.co.uk/privacynotice
Eventbrite	Registration for events	https://www.eventbrite.co.uk/help/en-gb/articles/460838/eventbrite-privacy-policy/
Timetastic	Staff details	https://timetastic.co.uk/legal/privacy-policy/
Mailchimp	Prospective and student data. Newsletter	https://www.intuit.com/privacy/statement/
Google Workspace	Document Storage	https://policies.google.com/privacy?hl=en-GB
Kingdom Bank	Loan Provision	https://www.kingdom.bank/privacy-notice/
University of Chester	Validating partner	https://www.chester.ac.uk/about/legal/privacy/current-students-privacy-notice/
Birmingham Newman University	Validating partner	https://www.newman.ac.uk/knowledge-base/cookies-privacy-policy/
Stewardship	Online giving	https://www.stewardship.org.uk/transparency/privacy
Xero	Invoicing and accounts	https://www.xero.com/uk/legal/privacy/
Krystal Hosting	Information about students in Moodle	https://krystal.io/legal/privacy-policy
Slack	Internal comms	https://slack.com/intl/en-gb/trust/privacy/privacy-policy
HESA	Higher Education Statistics Agency	https://www.hesa.ac.uk/about/website/privacy
Shopify	Online merchandise & tickets	https://www.shopify.com/uk/legal/privacy
4D Digital LTD	Hosting	https://www.4d-digital.co.uk/privacy-policy/
Jotform	Form data Collecting	https://www.jotform.com/privacy/

We may also have to share your personal data with the following, or in the following situations:

- Professional advisers including lawyers, bankers, auditors and insurers based in the UK who provide legal, consultancy, banking, 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
- When someone's life is at risk, or we are required to do so by law
- A prospective buyer or seller if we sell any or all of our College or assets, or we buy another business or assets
- When we provide links to websites of other organisations, this Privacy Notice does not cover how that organisation processes personal information. We encourage you to read the privacy notices on the other websites you visit.

11. INTERNATIONAL TRANSFERS OF PERSONAL DATA

We may need to transfer some personal data to the third parties described above who are located outside the UK. In such cases, we will take appropriate measures to ensure your data remains protected. If the organisation is based outside the UK, and in a country that is not protected by an adequacy decision (providing an adequate level of data protection), we put in place appropriate safeguards, such as implementing the ICOs International Data Transfer Agreement (IDTA).

If you have any questions or need more information regarding international transfers of your personal data, please contact us. (Section 15: How to Contact Us).

12. AUTOMATIC COLLECTION, COOKIES AND AGGREGATE INFORMATION COLLECTED FROM OUR WEBSITE

We collect some data from visitors to our websites automatically. This includes what pages you have viewed, for how long and where you go on our website.

We use cookies to store information about how you use our sites. A cookie is a piece of data stored on a user's computer to remember information about you and create a profile of your viewing preferences. Your profile is used to tailor your visit to our website, make navigation easier, and direct you to information that best corresponds to your interests. We require your consent to place non-essential cookies on your device. You can change your cookie preferences by selecting the button in the bottom left corner from any page on our website. View our cookies policy: https://www.wtctheology.org.uk/cookies.

Information is also collected about how you arrived at our websites in the first place. This includes what links or adverts you have viewed or clicked on to reach us, or any search terms you have used. When you see a WTC advert outside our website, we may place a cookie on your browser. This is so that, when you access

our website, we recognise that you have seen an advert of ours elsewhere. If you have logged in, this includes your login details.

Aggregate information is collected from users using our own web tracker. This information includes users' anonymised Internet Protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, platform type, date/time of visit, number of clicks, error pages, and number of unique visits. This information is not linked to personal profiles or personally identifiable information provided by users. We use the information to analyse visitor trends and use of our website, administer the website, and gather broad demographic information of our website users.

13. HOW CAN YOU CONTROL YOUR DATA?

When you submit information via our site, you may be given the ability to opt out of receiving emails from us. You do this by unsubscribing, using the links provided in our emails, or by emailing us.

You may access certain areas of our site without providing any data at all. However, to use all features and functions available on our site, you may be required to submit or allow for the collection of certain data.

You may withdraw your consent for us to use your personal data at any time by contacting us, and we will delete your data from our systems. However, you acknowledge this may limit our ability to provide the best possible products and services to you. (Section 15: How to Contact Us).

Please tell us as soon as any of your contact details change so that we can keep our records up to date.

If you have an account with our CDMS, (e.g. the student portal, MyWTC), you can personally log-on to your account and update your contact details.

You can change the way we contact you, or the kind of material we send you, at any time by contacting us by post, or email using the contact details below.

14. SUMMARY OF YOUR RIGHTS

As a data subject, you have several rights and control over how your data is used. You can:

- request access to, deletion of, or correction of, any personal data we hold
- ask for a copy of the data you have given us
- require us to amend or change incorrect or incomplete data
- require us to delete or stop processing your data, where the data is no longer necessary for the purposes of processing
- object to the processing of your data where we are relying on its legitimate interests as the legal ground for processing
- ask us to stop processing data for a period if data is inaccurate, or there is a dispute about whether your interests override the company's legitimate

grounds for processing data.

To enforce any of the foregoing rights, or if you have any other questions about our site or this Privacy Notice, please contact us using the details set out in Section 15: How to Contact Us.

15. HOW TO CONTACT US

If you have any questions about this Notice, or wish to make a complaint please contact us in writing, through our website, or by emailing us at dataprotection@wtctheology.org.uk.

Please ensure that your query is clear, particularly if it is a request for information about the data we hold about you.

16. HOW TO COMPLAIN

If you are unhappy with the way that we have processed or handled your data, please contact us.

If the response does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the Information Commissioner's Office (ICO). The ICO is the supervisory body authorised by the Data Protection Act 2018 to regulate the handling of personal data within the United Kingdom.

The contact details for the Information Commissioner's Office are:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF.
Telephone: 0303 123 1113
Website: https://ico.org.uk/concerns/

17. CHANGES TO OUR PRIVACY NOTICE

We may change this Privacy Notice as we may deem necessary from time to time, or as may be required by English law. Any changes will be immediately posted on our site, and you will be deemed to have accepted the terms of the Privacy Notice on your first use of our site following the alterations. We recommend that you check this page regularly to keep up to date.

The most recent update was in January 2026.