



Klemi Privacy Notice

Klemi is committed to protecting your privacy. At all times we aim to respect any personal information you share with us, or that we receive from other sources, and keep it safe.

Please read this **notice** carefully. It provides information about the different types of personal information that we collect (including through your use of our website – www.klemi.co) and how we will use this information.

If you use the Klemi app as part of your church operations, we act as a processor on behalf of your church. This means that we use the information uploaded to the app (whether uploaded by you or another person within your organisation) exclusively as directed by your church, and we have an agreement in place with your church that sets out the terms on which we access and use this information. For more information about how your church uses your personal information, please see your church's privacy notice.

We may also provide you with specific notices explaining how we use your personal information in relation to a particular project or activity.

Please click on the links below for further information about the different types of personal information we collect and how it is used.

If you have any questions please contact us using the contact details in section 1.

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1. **Who we are and how to contact us**

We are Klemi.co LLP, a limited liability partnership with number OC414047 and registered address 226 Worple Road, London, United Kingdom, SW20 8RH. When we refer to "**Klemi**" we are referring to Klemi.co.

Klemi offers an admin app for small to medium-sized churches, providing a supportive framework for church life - improving communication, clarifying roles and comprehensively managing church records.



If you have any questions about how we use your personal information or how we comply with our responsibilities, please contact us as follows:

- Email: hello@klemi.co
- Call: 07863544228
- Write: 226 Worple Rd, London, SW20 8RH

2. **When do we collect personal information about you?**

We may hold personal information relating to you from a number of sources and will collect personal information about you:

- (a) When you give it to us **directly****
For example, when you contact us with a query, or ask for information about how the Klemi app may fit your church's organisational needs.
- (b) When we obtain it **indirectly****
Your personal information may have been provided to us by others. For example, a member of your church provides us with your contact details, and suggests you may be interested in hearing about the Klemi app.
- (c) When it is available **publicly****

Your personal information may be available to us from external publicly available sources. For example, depending upon your privacy settings for social media services, we may access information from these accounts or services. This may occur if you interact with us via our Facebook page, or tweet at us on Twitter.
- (d) When you **visit the website:****
When you visit the website (whether on a computer or through a mobile application), we automatically collect certain pieces of technical information. This includes your IP address and recent activity.
- (e) When you **use the app:****
We will collect information about how you use the Klemi app, for example which functions you use the most, and which you interact with the least.

We also use cookies to assist with the functioning of the website. Please see our Cookies Notice for more information.

3. **What personal information do we collect?**

The personal information that we collect and use about individuals includes, but is not restricted to:

- name
- contact details (email, phone and address)
- position in your church



- records of your correspondence with us, including through our online contact form on our website, email
- records of your interaction with us on our Facebook page
- your marketing preferences
- your interactions with the Klemi app (however, not the information you upload and record using the Klemi app)
- payment information and payment records (if you subscribe to Klemi)
- any other information you may provide (for example, information you give when you express interest in using the Klemi app within your church)

If you contact us for any other reason we will collect your name, email and any information you provide to us as part of our correspondence.

4. **Special categories of data**

Data protection law recognises certain categories of personal information are sensitive and therefore require more protection. These categories of data include information about your race or ethnic origins, political opinions, sex life or sexual orientation, religious beliefs and health data. Additionally there are further rules concerning the use of criminal data. We will not usually collect this type of data from you. We will only process this data if there is a valid reason for doing so and where the law allows us to do so.

For example, if we host an event that you wish to attend, we may request your explicit consent to collect accessibility and dietary information. You always have the right to withdraw your consent.

5. **When will we get in touch?**

When you give us your personal details you may receive follow up information from us directly, including news about Klemi in general, as well as about any specific information about which you've enquired. Some of these communications are administrative (for example to confirm details about your query) but others are marketing focussed.

We will only send marketing materials to your personal email address where you've requested to receive it (for example, if you sign up to our newsletter). However, if you have subscribed to the Klemi app in the past or contacted us to explore using the Klemi app within your church, we may contact you in the future about similar management solutions that we develop. We will always provide you with an opportunity to opt out of any further communication, as discussed more below.

We may also send marketing materials via email to your work email address (if you work at a company, partnership or other incorporated body) if we feel that you may be interested in hearing more about Klemi and our work.

We provide easy ways to stop our marketing, and **you can opt out at any time.**

If at any time you wish to stop or change how we communicate with you, or update the information we hold, please do get in touch, using any of the options set out in [section 1](#).



To opt out of emails, click on the unsubscribe link at the bottom of our messages

6. **What we do with your personal information**

We use the personal information collected for the following purposes:

- to provide you with information about the Klemi's app when requested by you, as well as general information about our organisation
- to send administrative messages about your subscription to the Klemi app, for example regarding any anticipated downtime
- to arrange for your subscription
- to promote Klemi, for example through Facebook
- to analyse, evaluate and improve Klemi's services (for example, we may use information about which functions are used the most to improve those functions)
- to provide updates on our work
- to conduct administrative tasks such as keeping track of subscriptions, and ensuring feedback has been addressed
- to satisfy legal obligations which are binding on us
- for research purposes
- for the prevention of fraud or misuse of services
- for the establishment, defence or enforcement of legal claims

7. **Lawful processing**

We are required to rely on one or more lawful grounds to collect and use the personal information that we have outlined above. We consider the grounds listed below to be relevant:

(a) **Legitimate interests**

Where applicable law allows us to collect and use personal information for our or another person's legitimate interests, and the use of your personal information is fair, balanced and does not unduly impact your rights.

Where you provide information and would like us to contact you, we will rely on the legitimate interest ground to communicate with you in most instances.

(b) **Consent**

Where we ask for your consent for our use of your personal information for a specific purpose. You always have the right to withdraw your consent.



- (c) **Contract**
Where it is necessary to use your personal information to fulfil a contract with you or to take steps at your request prior to entering into one.
- (d) **Legal obligation**
Where the processing of your personal information is necessary for us to comply with a legal obligation to which we are subject. For example, we may need to report matters from time to time to HM Revenue & Customs.

8. **Do we share your personal information?**

The personal information we hold about you will be provided to our staff but only as required for the purposes of our organisation.

We may disclose your personal information to selected third party processors (for example, the company which provides technical support for our website and electronic communications) for the purposes outlined at [section 6](#). The third party in question will be required to use any personal information they receive in accordance with our instructions and under a written agreement with us.

If we share your information with any other third party to use for their own purposes, we will let you know in advance where reasonably possible.

We reserve the right to disclose your personal information to third parties:

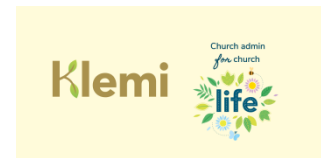
- (a) in the event that we buy or sell any business or assets, in which case we may disclose your personal information to the prospective buyer or seller of such business or assets;
- (b) if substantially all of our assets are acquired by a third party, personal information held by us may be one of the transferred assets;
- (c) with our professional advisors e.g. lawyers, where necessary to protect our interests;
- (d) if we are under any legal or regulatory obligation to do so; and
- (e) in connection with any legal proceedings or prospective legal proceedings, in order to establish, exercise or defend our legal rights.

Where we share your personal information with other companies or organisations, we do not permit them to send you marketing about them. We may need to share limited information with our service providers who help us to prepare and send you our communications. However, we take steps to restrict the way these organisations can use your personal information so that they cannot use it for their own purposes. We take care to ensure that they keep your personal information secure, and delete it when it is no longer needed.

9. **International Data Transfers**

The website is hosted in the UK and/ or the European Economic Area (**EEA**), however we operate around the world. This means that it is possible that personal information we collect from you may be transferred to and stored in a location outside of the UK or the EEA.

Please note that certain countries outside of the UK or the EEA have a lower standard of protection for personal information, including lower security protections. Where your personal information is transferred, stored, and/or otherwise processed outside the UK or EEA in a country which does not



offer an equivalent standard of protection to the UK or EEA, we will take all reasonable steps necessary to ensure that the recipient implements appropriate safeguards designed to protect your personal information. For instance we may use cloud providers to store personal information who have servers in the US and are signed up to the Privacy Shield or we may enter into the European Commission approved standard contractual clauses with such providers. If you have any questions about the transfer of your personal information, please contact us using the details at [section 1](#).

10. **How long do we keep your personal information?**

We will keep your personal information only for as long as required in connection with the purposes for which it was collected and/or is used. Usually this will not be for longer than 6 years after your last interaction with us. We may also retain information for longer periods where we are required to do so in accordance with legal or regulatory requirements, such as tax and accounting.

In specific circumstances we may also retain your personal information for longer so that we have an accurate record of your dealings with us in the event of any complaints or challenges.

If you would like further information about this, please contact us using the details at [section 1](#).

11. **Your Rights**

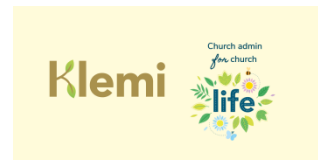
We explain how you can update your communication preferences above at [section 5](#) above. Where we rely on your consent, you have the right to withdraw your consent at any time.

When we use your personal information you have the right to:

- Ask us for **confirmation** of what personal information we hold about you, and to request access to a copy of that information. If we are satisfied that you have a right to see this personal information, and we are able to confirm your identity, we will, except where we consider an exemption applies, provide you with this personal information.
- Request that we **erase** the personal information we hold about you, as far as we are able to do so.
- Ask that we **correct** any personal information that we hold about you which you believe to be inaccurate.
- **Object** to the processing of your personal information where we: (i) process on the basis of the legitimate interests ground; (ii) use the personal information for direct marketing; or (iii) use the personal information for research purposes.
- Ask for the provision of your personal information in a machine-readable format (the **data portability** right) to either yourself or a third party, provided that the personal information in question has been provided to us by you, and is being processed by us: (i) in reliance on your consent; or (ii) because it is necessary for the performance of a contract to which you are a party; and in either instance, we are processing it using automated means.
- Ask for processing of your personal information to be **restricted** if there is disagreement about its accuracy or legitimate use.

If you decide you do not want to receive any further communications from us, please tell us.

Please note that you also have the right to lodge a complaint with the relevant data protection supervisory authority. For example, in the UK this is the Information Commissioner's Office at www.ico.org.uk/concerns.



12. **Updating this Privacy Notice**

We may update this notice. If we update this notice in a way that significantly changes how we use your personal information, we will bring these changes to your attention where reasonably possible. Otherwise, you can access the latest version of this notice on our website.

Version: 1.0

Dated: Sept 2019