

# PRIVACY NOTICE Contact Management System [CMS] & Mailing Lists

#### 1. Purpose of this Notice

The Diocese of St Edmundsbury and Ipswich ("Diocese") has created this Privacy Notice to ensure compliance with legal and regulatory requirements regarding the Personal Data collected about you. This Privacy Notice explains what personal data might be collected, how and why it would be collected, who it might be shared with and how it is protected.

Appendix A outlines how you can complain to the Diocese or the Supervisory Authority, if you have concerns that this notice is not being applied in relation to your personal data.

#### 2. What personal information could be collected, and how?

The information collected about you is information that you have provided via the diocesan website, by email, via subscription to an e-mailing list, in writing, by telephone or in person; or any updates to that information you have provided since. This may include the following, in accordance with the role you hold or the purposes for which you have provided the information:

- Name.
- Contact details, including but not limited to addresses, telephone numbers and email addresses.
- Date of birth & age (only where applicable).

This information is retained for the duration of your use of our service(s) and in line with our Data Retention Schedule – available to users within the Data & IT Policy.

#### 3. How is your information stored and accessed?

Your information is held in an online Contact Management System ["CMS"], by Insight<sup>®</sup> (our learning and development platform), and/or MailChimp<sup>®</sup> if you have subscribed to receive information through that channel, both of which only accessible to registered Users.

CMS Users comprise of:

- Employees of the Diocese and those working on its behalf as contractors or volunteers.
- Those who hold the following roles on behalf of the Diocese and/or Church of England Parishes within the Diocese:
  - Those who hold a Bishop's Licence or Commission.
  - Parochial or Benefice Church Council Members (PCCs/BCCs).
  - Members of the General, Diocesan &/or Deanery Synods.
  - Others with recognised roles for a parish or deanery that may not already be part of any of the above groups (e.g. Deanery Organisers)

MailChimp<sup>®</sup> and Creative Stream<sup>®</sup> users comprise of:

• Employees of the Diocese and those working on its behalf as contractors or volunteers provided with authorisation by the Diocesan Communications Manager.

MailChimp<sup>®</sup> have their own Privacy Policy that can be viewed <u>here</u>.

We do not store or transfer this data outside of the European Economic Area (EEA).

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# 4. How will the Diocese use your information?

The Diocese will use your personal information to maintain accurate records for contacting you for the following purposes:

- to keep you updated with news about the Diocese, via email bulletins and postal services.
- to provide any information or instruction necessary for the support and performance of roles on behalf of the Diocese and/or Church of England Parishes within the Diocese, and their related responsibilities.
- To provide agendas, papers and any other relevant information for Diocesan boards, committees and meetings including trustees, synod and committee members, and their advisers and other attendees.
- To monitor learning, progress, and involvement with the Church of England in Suffolk.

We do not use your data for automated decision-making or profiling.

# 5. Sharing your information

The Diocese will not sell or disclose your information to third parties other than those needed to meet contractual or legal obligations or to protect the vital interests of the data subjects we collect data about. For the purpose of marketing, we have conducted a Legitimate Interest Assessment.

The information the Diocese holds about you will only be used for the purposes stated and will be retained in line with the requirements of our retention policy, which is available to all. The Diocese may disclose your information to the following third parties:

- Registered User of the CMS
  - by default, your information is only available to all other Diocese registered Users (see Section 3).
  - privacy settings can be amended to further restrict visibility (where it is not necessary for your information to be available for the performance of your role) or make it more widely available to the registered Users of the CMS nationally as part of the broader Church of England.
- To law enforcement agencies to prevent and detect criminal activity or for safeguarding purposes (if applicable) - this excludes private investigators. The Diocese will not disclose Personal Data in this instance.

# 6. How will the Diocese protect your information?

The Diocese use a range of security techniques to protect Personal Data, these are, but are not limited to:

- security policy;
- use of encryption techniques;
- control of mobile devices;
- employee, volunteer and worker security training program(s);
- robust and up to date anti-malware programs are utilised;
- secure data disposal;
- access control;
- network monitoring and management.

# 7. Your Rights

You have a number of rights in regard to your Personal Data, and the Diocese observes and complies with these rights by ensuring that you can have access, upon request, to any of the data we hold about you. You have other rights in regard to your Personal Data that you may exercise in the event that the Diocese have no legal basis to reject your request, these rights are:

- You may object or restrict our handling of your data.
- You may have your data provided to you in a portable, readable and useable format.
- You may request to have your data corrected or updated at any time if you believe the data we hold is incorrect.
- You may request that your data is erased from our systems when we have no legal reason for retaining it.

# Appendix A

The contact information provided below is to enable anyone to exercise their rights in regard to their own personal data that we hold or process. If you wish to exercise your rights as detailed above, please contact us on the below email address and we will respond to you within 30 days.

#### **Relevant contact information:**

Leonie Ryle, Communications Manager - <u>communications@cofesuffolk.org</u>

If you wish to make a complaint about the way the Diocese handles your data, please contact the Information Commissioners Office (ICO) on the below contact details:

Wycliffe House, Wilmslow, Cheshire, SK9 5AF, Tel: 0303 123 1113 (local rate)

Or you can use the online service which allows you to make a complaint using the online form. You can report a breach, a concern or even just request more information. The ICO online can be found here: <a href="https://ico.org.uk/global/contact-us/">https://ico.org.uk/global/contact-us/</a>

Owner: Communications Manager Version 6.0 (June 2023) Last reviewed: Governance Committee (December 2022) To be reviewed annually or following a major amendment.