

The Centre for Cultural Witness' privacy notice

The Centre for Cultural Witness is committed to maintaining trust by protecting your personal data.

Personal data is any information relating to an identified or identifiable person. The Centre for Cultural Witness will process your personal data in a transparent and lawful way, as stated in our Data Protection Policy below.

We may change this statement from time to time to reflect privacy or security updates. We encourage you to periodically review this page for the latest information.

1. Important Information and Who We Are

There are a number of bodies, collectively known as the National Church Institutions (NCIs), which undertake work for the Church of England.

The purpose of the NCIs is to support the mission and ministries of the Church by working with those who serve in parishes, Dioceses, schools and other ministries, and with partners at a national and international level.

The NCIs are separate legal entities, but they are a common employer. The present arrangements were established under the National Institutions Measure 1998.

Data Controller

The seven National Church Institutions are:

- The Archbishops' Council
- Bishopthorpe Palace



• The Church of England Central Services (HR, Finance, Technology, Data Services, Internal Audit, Giving, Projects, Legal and Communications)

• The Church of England Pensions Board

• Lambeth Palace (The Archbishop of Canterbury in his corporate capacity).

National Society for Promoting Religious Education

This privacy notice is issued on behalf of the NCIs so when we mention "NCI", "we", "us" or "our" in this privacy notice, we are referring to the relevant charity in the NCIs responsible for processing your data.

The Centre for Cultural Witness is a department within Lambeth Palace (the Archbishop of Canterbury in his corporate capacity), a body corporate whose registered office is at Lambeth Palace, Lambeth Palace Road, London, SE1 7JU.

2. Why we collect and use your personal data

We have set out below a description of the ways we plan to use your personal data. We collect and process information so that we can:

- Promote and support the mission and ministry of the organisation;
- Perform the contract we have with you;
- Undertaking research and statistical analysis;
- Administer financial transactions and donations;
- Ask for financial support and non-financial support such as volunteering or prayer
- Manage our fundraising activities and donor communications
- Manage our websites and social media accounts;
- Administer our courses, events and programmes;
- Build our database of contributors (writers and other content producers);
- Maintaining our own accounts and records;

• Grow the impact and reach of the organisation through mainstream media;

• Manage our HR function;

Prevent and detect crime; and

• Where we need to comply with a legal or regulatory obligation.

Fundraising

Our aim at the Centre for Cultural Witness is to inspire a renewal of the public understanding of Christian faith. This is made possible by the generosity of those who support our work inspired by Christian faith. To grow the impact of the Centre to build that renewal of understanding across the UK and beyond, we are committed to connecting with individuals who are interested in the Church's cultural witness. Developing the best possible understanding of our supporters and those who may support our work in the future is crucial in making our fundraising efforts as relevant as they can possibly be.

Where we believe we have a legitimate interest to do so, particularly if you have donated to the Centre for Cultural Witness, we may use the information we hold about you and publicly available information to identify connections between you and other potential supporters to the Centre. We may also use this information to tailor any invitations we make to reflect your specific interests in the Centre's mission, at an appropriate level.

Transformational giving is an important part of our engagement activity. We may use public information to identify individuals who we believe may have the interest and capacity to make a gift of this nature. In particular:

- We may carry out desk and online research. This involves reviewing sources of publicly available information, such as business websites, Companies House and Linked-In to build up a picture of interests and preferences.
- We may also use a trusted third-party partner to automate some of this work by screening your name and address details against databases built up from publicly available information. The third party doing this work will only use your data to help us with our fundraising. It cannot use your data for any other purposes. We never share any of your financial transactions with the Centre for Cultural Witness with this third party.

Where this activity is being undertaken for potential new supporters with whom the Centre for Cultural Witness has no previous relationship, we

will provide the individual with a link to this Privacy Notice as part of our engagement at the earliest practical opportunity.

You can opt out of your data being used for research at any time or ask for an explanation of what we do by emailing

information@culturalwitness.org.

Change Of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to see an explanation as to how the processing for the new purpose is compatible with the original purpose, please email information@culturalwitness.org.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

3. The categories of personal data we collect

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes first name, maiden name, last name, username or similar identifier, title, date of birth and gender.
- Contact Data includes billing address, delivery address, email address and telephone numbers.
- Financial Data includes bank account and payment card details.
- Transaction Data includes details about payments to and from you and other details of events, products or services you have purchased from us or gifts you have donated to us.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plugin types and versions, operating system and platform and other technology on the devices you use to access this website.
- Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey

responses.

• Usage Data includes information about how you use our website, events, products and services.

• Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication

preferences.

Page 5

As a faith-based organisation, we collect data about how you engage with the services we provide, which in some instances is likely to comeunder the definition of Special Categories of Personal Data (e.g. religious or philosophical beliefs). We will always make it clear to you when we collect this information and why.

4. The lawful basis for using your information

We collect and use information under one or more of the following legal bases:

- Consent: we need your permission to use your information. Where we require consent to use your information we will make it clear when we ask for consent and explain how to go about withdrawing your consent.
- Legal obligation: we need to process your information to comply with the law.
- Contract: we need to process your information as part of a contract.
- Legitimate interest: we need to process your information in order to undertake tasks and duties related to the Centre for Cultural Witness. Where we process your data under this legal basis, we have undertaken a Legitimate Interests Assessment which sets out why we consider such processing is justified.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please email information@culturalwitness.org if you need details about the specific legal ground we are relying on to process your personal data.

5. Who we collect from or share your information with:

We use different methods to collect data from and about you which include:

Direct Interactions

We collect your data through the following direct transactions. This includes personal data you provide when you:

• subscribe to our service or publications;

register for an event, course or programme;

- request marketing to be sent to you;
- send us an enquiry email;
- create an account on our website;
- enter a competition, promotion or survey; or
- give us some feedback.

Third Parties

Internal Third Parties:

Other bodies within the NCIs acting as joint controllers or processors who provide IT and system administration services.

External Third Parties

- Online Customer Relationship Management (CRM) services
- Online video conferencing services that we use for meetings, courses, events and training.
- Cloud based hosting services
- Contractors who provide organisational growth services to help the Centre for Cultural Witness develop its activity and ministry.
- Academic partner institutions where we hold specific events in partnership.
- Professional advisers including lawyers, bankers, auditors, pension advisors and insurers based in the United Kingdom who provide

consultancy, banking, legal, insurance and accounting services.

• Event management systems such as Eventbrite.

• Electronic mailing and survey services.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-

party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

You can ask us or third parties to stop sending you messages at any time by writing to us at **information@culturalwitness.org** or by following the opt-out links on any communication or marketing message sent to you.

6. International transfers

Where possible we will endeavour to use suppliers with servers within the European Economic Area. On occasion we may use certain third parties outside of this area, for example in the USA. Typically, these services are certified under the EU-US Privacy Shield programme and we will ensure that any other transfers are complaint with the UK GDPR or the EU GDPR.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data Retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying

any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the

potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and

whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by

emailing information@culturalwitness.org.

9. Your rights

You have the following rights regarding your personal data:

- The right to be informed about any data we hold about you;
- The right to request a copy of your personal data which we hold about you;
- The right to withdraw your consent at any time;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for us to retain such data;
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of your personal data (if applicable);
- The right to request a transfer of your personal data

To exercise these rights, please contact the Centre for Cultural Witness Team using the contact information provided below. The NCIs Individual Rights Policy is available on request.

10. Complaints or concerns

If you have any queries regarding this processing activity, please contact, in the first instance, information@culturalwitness.org.

If you have any concerns or queries about how the Centre for Cultural Witness handle your personal data, please contact the Data Protection

Officer at gdpr@churchofengland.org or online at: or online at: National Church Institutions data protection | The Church of England or Tel:

020 7898 1030.

You have the right to make a complaint at any time to the Information Commissioner online at: Your personal information concerns | ICO, or by

phone on 0303 123 1113 (local rate).

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Page 10