



PRIVACY NOTICE

Lightwave and ChurchSuite

1 Purpose of this Notice

The Lightwave Bishops Mission Order ("Lightwave") part of the Diocese of St Edmundsbury and Ipswich ("Diocese") have created this Privacy Notice to ensure compliance with legal and regulatory requirements in regard to 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 Lightwave 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 Lightwave websites, by email, via subscription to an e-mailing, 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 (where applicable)
- Membership of and attendance at groups and events

This information is retained for the duration of your use of our service(s) plus three years thereafter, other than where there is a legal requirement to retain it for longer in accordance with a specified role (e.g. for safeguarding purposes).

3 How is your information stored and accessed?

Your information is held in an online Church Management System, ChurchSuite, if you have only subscribed to receive information through that channel, both of which only accessible to registered Users.

ChurchSuite users are

- employees of the Diocese and Lightwave and those working on its behalf as contractors or volunteers provided with authorisation by the Lightwave Project manager.
- Those in our ChurchSuite database who can see their own information and the information of others where those others have given their permission

We do not store or transfer this data outside of the European Economic Area (EEA) – see note below. Mailing list data held in ChurchSuite is located in the UK.

4 How will Lightwave use your information?

Lightwave will use your personal information to maintain accurate records for contacting you for the following purposes;

- to keep you updated with news about Lightwave, via email bulletins and postal services.
- to provide any information or instruction necessary for the support and performance of roles for those who have formal and informal roles on behalf of Lightwave, and their related responsibilities.
- To provide agendas, papers and any other relevant information for those who are members of Lightwave boards, committees and meetings; including trustees, committee members, and their advisers and other attendees.

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

5 Sharing your information

Lightwave 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 Lightwave 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. Lightwave may disclose your information to the following third parties;

- Registered Users of Lightwave ChurchSuite
 - by default, your information is only available to all other Lightwave ChurchSuite registered Users where you have given that permission (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)
- To law enforcement agencies to prevent and detect criminal activity or for safeguarding purposes (if applicable) - this excludes private investigators. Lightwave will not disclose Personal Data in this instance.

6 How will Lightwave protect your information?

Lightwave uses 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 Lightwave 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 Lightwave 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 delivered to you in a portable, readable and useable format.
- You may have your data corrected or updated at any time if you believe the data we hold is incorrect.
- You may have your data 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:

Lightwave Project Manager – andrew.gosden@cofesuffolk.org

Director of Communications - communications@cofesuffolk.org

If you wish to make a complaint about the way Lightwave 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: <https://ico.org.uk/global/contact-us/>

Owner: Lightwave Project Manager

Owner: Diocesan Director of Communications

Version 1.1 (March 2021)

To be reviewed annually or following a major amendment.

Based on the Diocesan PRIVACY NOTICE Contact Management System [CMS] & Mailing Lists
Version 4.1 (April 2020)

NOTE REGARDING THE SITUATION POST BREXIT – 8th March 2021

The UK (post Brexit 31st December 2020), is in a 4 month "bridge" period, during which the previous rules regarding data transfers between the UK and EU are still in effect. The bridge period is due to come to an end on 30th April 2021, at which point the "adequacy agreement" (draft versions of which were published on 19th Feb 2021) are expected to apply. If the "adequacy agreement" is formally adopted by the EEA (which is broadly expected to be the case) then the measures it contains should ensure that for the next 4 years any transfers between EEA and UK will comply with the appropriate regulations. This note will be updated once the adequacy agreement is in place.