



THE ARCHBISHOP
OF YORK

Introduction

This policy is effective from 25 May 2018

Welcome to the Archbishop of York's official website. The Archbishop of York takes your privacy seriously and is committed to protecting your personal data.

This privacy and cookie policy tells you how we deal with your personal data, your privacy and other various rights you have when you use this site or supply information to us. Please note that use of our web site also includes our Terms and Conditions. Please also use the Glossary to understand the meaning of some of the terms used in this privacy and cookie policy.

1. Important information and who we are

Purpose of this privacy and cookie policy

This privacy and cookie policy aims to give you information on how the Archbishop of York collects and processes your personal data through your use of this website, including any data you may provide through this website or otherwise.

It is important that you read this privacy and cookie policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy and cookie policy supplements any other policies and notices and is not intended to override them.

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

Data Controller

The Archbishop of York (in his corporate capacity) (also referred to as either, "we", "us" or "our" in this privacy and cookie policy) is the data controller who determines the purposes for which, and the way in which, your personal data is processed. It is also responsible for looking after your personal data pursuant to all relevant legislation and to whom you should liaise if you have any questions or concerns about your personal data.

We are registered with the Information Commissioner, registration number Z4888418.

If you have any questions about this privacy and cookie policy, including any requests to exercise your legal rights, please contact us using the

details set out below.

- Contact us **form on this website.**
- **Postal address:** Bishopthorpe Palace, Bishopthorpe, York, YO23 2GE.

Complaints

If you have any complaints or queries about matters affecting your privacy, or any other general data protection matters, then please do let us know by contacting us as set out above and we will endeavour to resolve the problem. In any event you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. The ICO can be contacted on their helpline number which is 0303 123 1113 between 9am and 5pm Monday to Friday, or by other contact methods as set out on their website.

Please go to their website at www.ico.org.uk for more information.

Changes to this policy and your obligation to inform us of changes

The data protection law in the UK changed on 25 May 2018. Although this privacy and cookie policy sets out most of your rights under the new laws, we may not yet be able to respond to some of your requests (for example, a request for the transfer of your personal data) straight away as we are still working towards getting our systems ready for some of these changes.

It is important that the personal data we hold about you is accurate and current. Please do let us know if your personal data changes.

This version was last updated on 25 May 2018, historic versions can be obtained by contacting us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. Please do ensure you are familiar with any privacy notice or policy of any website you visit.

2. The data we collect about you

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 follows:

Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.

- **Contact Data** includes address, email address and telephone numbers.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in 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, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Communications Data** includes your preferences in receiving information from us and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy and cookie policy.

Generally we do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences. However, on occasions, for example through a direct interaction we may receive **Special Categories of Personal Data** such as:-

- Race or ethnic origin;
- Religious or philosophical beliefs;
- Sex life or sexual orientation;
- Health.

Processing these types of **Special Categories of Personal Data** is permitted under data protection law where data subjects have given explicit consent and, or, where it is carried out by a religious entity in the course of its legitimate activity.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity and Contact Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This may include personal data you provide when you:
 - create an account on our website;
 - subscribe to one of our publications;
 - request information to be sent to you;
 - enter a competition; or
 - replying to a survey; or
 - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.
- **Third parties sources.** We may receive personal data about you from other bodies within the Church of England, including the Archbishops of Canterbury (in his corporate capacity), The Church Commissioners for England, The Church of England Pensions Board, Lambeth Palace Library, The National Society (Church of England and Church of Wales) for Promoting Education and the Church of England Central Services (collectively referred to as the “National Church Institutions” or “NCIs”).

4. **How we use your personal data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where you consent to us using your personal data, for example when you correspond with us or request a newsletter (your consent can be withdrawn by you at any time as set out in this policy).
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

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

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

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 contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you to receive our latest news	(a) Identity (b) Contact (a) Your consent	Necessary to comply with a legal obligation
To manage our relationship with you which will include	(a) Notifying you about changes to our terms and conditions or privacy and cookie policy (b) Asking you to leave a review or take a survey (a) Identity (b) Contact (c) Profile (d) General Communications	Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)

<p>To enable you to partake in a competition or complete a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p> <p>(a) Performance of a contract with you</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow the church)</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>Necessary to comply with a legal obligation</p>

To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow the church)
To manage questions you may have, or issues relating to certain Special Categories of Data, such as race or ethnic origin; religious or philosophical beliefs; sex life or sexual orientation; or health	(a) Identity (b) Contact (c) Your consent	Necessary for our legitimate interests (as a religious body these may be issues you ask us about)

Third-parties

We do not share your personal data with any External Third Parties. Where we need to share your personal data we will obtain your express opt-in consent before we share it.

Opting out

You can ask us or third parties to stop sending you messages at any time by contacting us or where provided by logging into the website and checking or unchecking relevant boxes to adjust your preferences, or by following the opt-out links on any communication or marketing message sent to you.

Where you opt out of receiving these messages, this will not apply to personal data provided to us as a result of litigation or complaints and only as long as the information is required.

Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our sites.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

- **Cookies.** These are cookies that are required for the operation of our websites. They include, for example, cookies that enable you, where provided, to log onto the secure area of our websites.
- **Analytical/performance cookies.** These allow us to recognise and count the number of users and to see how the users move around our websites when they are using it. This helps us to improve the way our websites work, for example, by ensuring that users are finding what they are looking for easily.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie		Domain		Purpose	Type of cookie
Universal Analytics (Google)	www.google.com	<p>These cookies are used to collect information about how visitors use our website. We use the information to compile reports and to help us improve the website. The cookies collect information in an anonymous form, including the number of visitors to the website and blog, where visitors have come to the website from and the pages they visited.</p> <p>Read Google's overview of privacy and safeguarding data</p>	Analytical		

YouTube	www.youtube.com	<p>We embed videos from our official YouTube channel using YouTube’s privacy-enhanced mode. This mode may set cookies on your computer once you click on the YouTube video player, but YouTube will not store personally-identifiable cookie information for playbacks of embedded videos using the privacy-enhanced mode.</p> <p>Read YouTube’s embedding videos information page.</p>	Necessary
Hotjar	www.hotjar.com	<p>These cookies are used by a heatmapping analytics tool which collects information about how website visitors interact with our pages, which includes things like scroll amount, what links have been clicked and where content is highlighted.</p> <p>Read Hotjar’s legal overviews notices.</p>	Analytical

Facebook Pixel	www.facebook.com	<p>These cookies are used to track visitor activity on our website and allow us to track when visitors are accessing the website via our Facebook posts.</p> <p>Read Facebook's overview on their Pixel.</p>	Marketing
Cloudflare	www.cloudflare.com	<p>This cookie is used to identify individual clients behind a shared IP address and apply security settings on a per-client basis.</p> <p>It does not correspond to any user ID in your web application, and does not store any personally identifiable information.</p> <p>Read Cloudflare's overview on their cookie.</p>	Necessary
Church of England	www.churchofengland.org	<p>Agree to cookie – The user has accepted or not accepted use of cookies.</p> <p>Session cookie – improves site user experience.</p>	Necessary

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 get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

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.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties as set out in the *Glossary*.
- External Third Parties as set out in the *Glossary*.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy and cookie policy.

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.

6. International transfers

We do not transfer your personal data outside the European Economic Area (**EEA**) save that we occasionally use certain third party communications and marketing platforms such as MailChimp. MailChimp's servers are based in the USA. MailChimp is certified under the EU-US Privacy Shield program and we will ensure that any other transfers meet all legal requirements.

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

How long will you use my personal data for?

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 [contacting us](#).

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please [contact us](#).

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to

receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. **Glossary**

LAWFUL BASIS

Legitimate Interest means the interest of in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

Internal Third Parties – Other Church of England bodies

Other bodies within the Church of England include us and the Archbishop of Canterbury in his corporate capacity, The Archbishops' Council, The Church Commissioners For England, The Church of England Pensions Board, Lambeth Palace Library, The National Society (Church of England and Church of Wales) for Promoting Education and the Church of England Central Services and who are based in the UK (collectively referred to as the "National Church Institutions" or "NCIs").

External Third Parties

- Professional advisers including where necessary lawyers, and insurers based in the UK who provide legal and insurance services.
- MailChimp whose servers are based in the USA and provide a platform for electronic communications. MailChimp are certified under the EU-

US Privacy Shield program.

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