

St Stephen's Protestant Orphan Society

Privacy Statement

1. INTRODUCTION

St Stephen's Protestant Orphan Society ('the Society'), (its officers, employees and sub-committees) are committed to the proper processing of data in a manner consonant with the Data Protection Acts 1988, and 2003, and the General Data Protection Regulation (the "GDPR") (together the "Legislation")

Members of the Church of Ireland are mutually bound by consensual contract with each other and to the laws of the Church of Ireland in accordance with the Irish Church Act 1869 (section 20).

2. POLICY

This Data Privacy Policy ("Policy") has been developed to ensure our [members](#) or any other persons whose personal data the Society may hold feel confident about the privacy and security of personal data and to meet our obligations under the Legislation. Under the Legislation, 'personal data' is information that identifies you as an individual or is capable of doing so.

The Society as a 'data controller', must comply with the data protection principles set down in the Legislation and this Policy applies to all personal data collected, processed and stored by the Society in the course of their activities. The purpose of this Policy is to set out the procedures that are to be followed when dealing with personal data and to outline how the Society will collect and manage personal information in accordance with all relevant legislation and standards. The procedures set out herein must be followed at all times by the Society, its employees, agents, contractors, volunteers, office holders or other parties working on behalf of the Society.

This policy extends to all personal data whether stored in electronic or paper format. **The Bishop of Cork, Cloyne and Ross** has responsibility for the implementation of this Policy. For the Data Retention Policy see paragraph 9 below and for Data Security see paragraph 4 below.

3. WHAT IS DATA PROTECTION

Data Protection is the safeguarding of the privacy rights of individuals in relation to the processing of personal data, in both paper and electronic format. The Legislation sets out strict rules about the way in which personal data and sensitive personal data is collected, accessed, used and disclosed. The Legislation also permits individuals to access their personal data on request, and to have personal data amended if found to be incorrect.

The Legislation establishes seven core principles for compliance which require that the Society, as a data controller must:

1. Obtain and process personal data fairly, lawfully and in a transparent manner;
2. Collect the personal data only for one or more specified and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
3. Keep the personal data adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;

4. Keep the personal data accurate and up-to-date;
5. Retain the personal data no longer than is necessary for the purpose for which the data is processed;
6. Process the data in a manner that is safe and secure;

The Society shall be responsible for and be able to demonstrate compliance with the above principles.

4. HOW DOES THE SOCIETY PROTECT PERSONAL INFORMATION ABOUT ME?

The Society will take all reasonable steps to ensure that appropriate security measures are in place to protect the confidentiality of both electronic and manual data. Security measures will be reviewed from time to time, having regard to the technology available, the cost and the risk of unauthorised access.

All data is kept securely in designated areas of the Diocesan Office, the Bishop's Office or the secure room in the Bishop's Palace to which only authorised personnel have access. Computers and relevant computer files are password protected. It should be noted that data is also kept on laptop computers which are transported outside the confines of those offices for the purpose of facilitating the work of the Society. These are password protected and attended at all times. Only a limited number of authorised personnel have access to this information.

5. DOES THE SOCIETY DISCLOSE INFORMATION ABOUT ME TO ANYONE ELSE?

Personal data may be disclosed internally within the Society in accordance with the data protection principles and this Policy. Under no circumstances will personal data be passed to any department or any individual within the Society that does not reasonably require access to that personal data with respect to the purpose(s) for which it was collected and is being processed.

No data is disclosed to a third party, other than that required by the central administrative purposes of the Society, or when a reference is required from an officer of the Society arising from an activity of the data subject. All other disclosures will be made only with prior permission, or when there is a legal or statutory obligation to do so.

Whenever we disclose information to third parties, we will only disclose that amount of personal information necessary to meet the administrative or legal requirement. Third parties that receive customer information from the Society must satisfy us as to the measures taken to protect the personal data such parties receive.

Appropriate measures will be taken to ensure that all such disclosures or transfers of personal information to third parties will be completed in a secure manner and pursuant to contractual safeguards.

The Society may provide information, when legally required to do so and in response to properly made requests, for the purpose of the prevention and detection of crime, and the apprehension or prosecution of offenders. The Society may also provide information for the purpose of safeguarding national security. In the case of any such disclosure, the Society will do so only in accordance with the Legislation.

The Society may also provide information when required to do so by law, for example under a court order.

The Society may also transfer data to legal counsel where same is necessary for the defence of legal claims.

6. ACCURACY

Every reasonable effort is made to ensure that data is accurate, complete and up-to-date in accordance with the purpose for which it was collected.

As a data subject, you are responsible for ensuring that you inform the Society of any changes in your personal details. We endeavour to ensure personal information held by the Society is up to date and accurate.

7. WHAT DATA DOES THE SOCIETY HOLD?

The Society only holds personal data that is directly relevant to its dealings with a given data subject. That data will be collected, held, and processed in accordance with the data protection principles and with this Policy in a reasonable and lawful manner.

In the case of data subjects the following data may be processed (but only where relevant in each case):

- Surname
- Christian Name/s
- Title/s
- Dates of Birth
- Address including Eircode
- Telephone and/or fax number/s,
- Numbers or addresses for contact by Whatsapp or similar applications where this has the prior agreement of the participants
- E mail address/es
- Information about grant assistance sought and given.
- Financial information supplied by applicants
- The above information in relation to applicants' dependents
- Bank account details (to facilitate electronic payment of expenses and grants)
- Where they are relevant to our mission, or where you provide them to us, we may process demographic information such as gender, age, date of birth, marital status, nationality, education/work histories, academic/professional qualifications, hobbies, family composition, and dependants;
- Where you make donations or pay for activities, financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers;
- The data we process is likely to constitute sensitive personal data because, as a Society and charity associated with a church or churches, the fact that we process your data at all may be suggestive of your religious beliefs. Where you provide this information, we may also process other categories of sensitive personal data: racial or ethnic origin, sex life, mental and physical health, details of injuries, medication/treatment received, political beliefs, labour union affiliation, genetic data, biometric data, data concerning sexual orientation and criminal records, fines and other similar judicial records
- Together with such formal correspondence as may occur with the data subject from time to time

In the case of workers in the Society who work with children or vulnerable adults or in a healthcare setting the following additional information may be kept,

- Information received, including date and serial number of vetting, from the National Vetting Bureau
- Record of having attended child and adult safeguarding training

8. PROCESSING PERSONAL DATA

Any and all personal data collected by the Society from you is collected as it is necessary for our legitimate interests, or the legitimate interests of a third party. The Society may also use personal data in meeting certain obligations imposed by law. Data is collected and processed for the internal purposes of the Society (together with its committees and delegated structures).

These purposes include:

- The charitable objects and work of the Society
- Compliance with the requirements of the law of the State
- Provision of pastoral and spiritual care and to give support arising from such ecclesiastical services, as baptisms, confirmations, weddings and funerals, of applicants or their dependents;
- To notify of changes to our services, events and role holders;
- To send you communications which you have requested and that may be of interest to you. These may include information about campaigns, appeals and other fundraising activities;
- To process donations;
- To process a grant;
- To pay expenses or make similar payments;
- the maintenance of accurate records concerning
 - the administration of the Society;
 - the financial records of the Society, its donors and beneficiaries;
 - appointment of employees or volunteers;
 - Education administration arising from the education work of the Society;
 - the officers and members of committees of the Society;
 - the implementation of *Safeguarding*, including the National Vetting Bureau process; and
 - statistical analysis and strategic review of the work of the Society.
- the maintenance of a record of correspondence received and sent by the Society , its employees and its sub-committees in relation to any of the aforementioned people;
- the provision of necessary administrative support, training, or other services within the Society;
- and such other work and ministry enjoined on the Society from time to time by virtue of their role or office within the Society or arising from statutory obligation or other obligations stemming from the law of Ireland or from the law of the Church of Ireland.

Data is not collected from third parties, except by way of confidential reference in respect of referees at the time of appointment to positions in the Society or in fulfilment of the *Constitution of the Church of Ireland* or the law generally of the Church of Ireland.

9. HOW LONG DOES THE SOCIETY KEEP PERSONAL INFORMATION?

The period for which the Society retains information varies according to the use of that information. In some cases, there are legal requirements to keep data for a minimum period of time. Unless specific legal requirements dictate otherwise, Society will retain information no longer than is necessary for the purposes for which the data were collected or for which they are further processed.

Data collected and relevant retention periods are as follows:

Category of User/Personal Data	Date from which Retention Period Starts	Retention Period	Purpose
Contact details: Names, addresses, email addresses, telephone numbers	The date on which an individual opts out of receiving communications.	Seven (7) years	Protection of the Society – period of limitation within which individuals can bring proceedings against the Society under contract law, negligence claims, etc. If an individual opts back in, the retention period resets until the next period of inactivity.
Information concerning grant assistance	The date on which the last payment is made.	Seven (7) years	The accountability of the Society as a charity or the trustees in the exercise of charitable functions.
Bank account details	The date on which the last payment (or an expenses or grant) is made.	Seven (7) years	The accountability of the Society as a charity or the trustees in the exercise of charitable functions.
Sensitive personal data collected in the course of pastoral work	The date on which an individual opts out of receiving communications, with the exception of child protection records.	Seven (7) years (with the exception of child protection records)	Membership of the Church of Ireland or other churches as a religious organisation, and participation therein, and to vouch for eligibility to receive grants from the Society.
Data and records that arise from the Safeguarding of children		Indefinitely	As required by Safeguarding Trust

10.HOW CAN I EXERCISE MY RIGHTS IN RESPECT OF PERSONAL INFORMATION THE SOCIETY HOLDS ABOUT ME?

The Society shall vindicate all your rights under the Legislation. These rights are as follows:

- your right to request from the Society access to personal data, and to have any incorrect personal data rectified;
- your right to the restriction of processing concerning you or to object to processing;
- your right to have your personal data transferred to another employer;
- your right to have personal data erased (where appropriate); and
- information on the existence of automated decision-making, if any, as well as meaningful information about the logic involved, its significance and its envisaged consequences.

Vindication of your rights shall not affect any rights which the Society may have under the Legislation.

If you want to know what personal information the Society holds about you or exercise any of the above rights, you can do so by making your specific request in writing to the Society at the following address: **Diocesan Office, St Nicholas House, 14 Cove Street, Cork, T12 RP40.**

The Society will confirm your request within **[21]** days of receipt, and process your request within 30 days of receipt, unless there is a significant amount of information at which point we might need to extend the period for a further 2 months. If the information the Society holds about you is inaccurate, the Society requests that you advise it promptly so that it can make the necessary amendments and confirm that these have been made within 30 days of receipt of your request.

11.HOW CAN I MAKE A COMPLAINT TO THE SOCIETY ABOUT THE USE OF MY PERSONAL DATA?

Complaints on the use, retention and disposal of personal data can be submitted in writing to the Society at **St Nicholas House, 14 Cove Street, Cork, T12 RP40.**

As a data subject you also have the right to lodge a complaint with the Data Protection Commissioner.

12.TRANSFERS OF DATA ABROAD

Any electronic personal data transferred to countries or territories outside the EEA will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the European Union.

13.CCTV MONITORING (WHERE RELEVANT)

Closed circuit television cameras are used for the security of property and in order to protect against damage or theft. Access to the recorded material will be strictly limited to authorised personnel. The policy governing the Society in this connection is the relevant policy in place covering CCTV usage of the Diocesan Council of the United Dioceses of Cork, Cloyne and Ross.

14.REVIEW

This policy will be reviewed and updated from time to time to take into account changes in the law and the experience of the policy in practice.

**St Stephen's Protestant Orphan Society
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