

Kingston Charity Trust

Kingston College, Mitchelstown, Co Cork

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PRIVACY STATEMENT

Last Updated: January 2026

1. INTRODUCTION

Kingston Charity Trust ('the Trust', 'we', 'us', 'our') is committed to the proper processing of data in a manner compliant with the Data Protection Acts 1988–2018 and the General Data Protection Regulation ('GDPR') (together, the "Legislation").

The Charity is a not-for-profit organisation providing sheltered housing for necessitous persons, including Protestant men and women and such other persons as the Trust may decide, with on-site warden support available on a full-time basis.

The Trust is the data controller for the personal data it processes, meaning we determine the purposes and means of processing your personal data.

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. DATA CONTROLLER

Kingston Charity Trust is the data controller responsible for your personal data.

Contact Details for Data Protection Queries:

- **Data Controller: Trustees of Kingston Charity Trust**
- **Address:** St. Nicholas' House, 14 Cove Street, Cork, T12 RP40
- **Telephone:** +353 21 500 5080

Email: secretary@corkchurchofireland.com

3. POLICY

This Data Privacy Policy ("Policy") has been developed to ensure any person whose personal data the Trust may hold feels confident about the privacy and security of personal data and to meet our obligations under the Legislation. Under the Legislation, 'personal data' means information that identifies you as an individual or is capable of doing so.

The Trust, 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 Trust in the course of its 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 Trust 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 Trust, its employees, agents, contractors, volunteers, office holders or other parties working on behalf of the Trust.

This policy extends to all personal data whether stored in electronic or paper format.

The Trustees of Kingston Charity Trust have collective responsibility for ensuring compliance with this Policy and for the Trust's obligations under the Legislation. The Bishop of Cork, Cloyne and Ross, as a trustee of the Trust, has particular responsibility for oversight of the implementation of this Policy.

4. 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 formats. The Legislation sets out strict rules about the way in which personal data and special category 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 Trust, as a data controller, must:

1. obtain and process personal data fairly, lawfully, and in a transparent manner;
2. collect personal data only for one or more specified, explicit, and legitimate purposes, and not further process it in a manner incompatible with those purposes;
3. keep personal data adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed

4. keep personal data accurate and up to date;
 5. retain personal data no longer than is necessary for the purposes for which it is processed;
 6. process data in a manner that is safe and secure, using appropriate technical and organisational measures;
 7. be responsible for, and able to demonstrate compliance with, the above principles.
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5. TYPES OF PERSONAL DATA WE COLLECT

The Trust 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.

We collect the following types of personal data in order to carry out our charitable functions:

5.1 Trustees

Names and contact details of trustees

5.2 Employees and Volunteers

Employer/employee records (we employ three employees) and records of dealings with private contractors and volunteers

5.3 Applicants and Residents

Applications for residency, residents' registrations, and correspondence and financial records.

The registration form collects:

- Name and identity information including surname, title, Christian names, and date of birth
- Contact details including email address, landline telephone, mobile telephone, and work telephone
- Occupation details including employment status (employed, self-employed, unemployed, retired, student, or child under school-going age), occupation, and address of place of work
- Next of kin information including names, addresses, Eircodes, email addresses, and telephone numbers for emergency contact purposes
- Representative information including name and address of a representative to be contacted in the event of permanent incapacity or death
- Grant recipient information including PPS Number where a resident is a

- recipient of Government or other grants
- Optional bank account details including name of bank, address of bank, name on account, IBAN details, and BIC for payment or refund purposes
- Optional information about religion or religious denomination for spiritual well-being purposes

5.4 Financial Records

- Bank account details (to facilitate electronic payment of expenses and grants)
 - Income details (employment, pensions, investments, other sources)
 - Savings and investment details
 - Property ownership and valuation details
 - Rental payment information
 - 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
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6. HOW WE COLLECT YOUR PERSONAL DATA

Data is collected electronically and through application forms which may be completed electronically and printed.

Data may also be collected from third parties, such as schools attended by applicants and other grant-awarding bodies to whom an applicant for a grant from the Charity may have made an application.

7. HOW WE USE YOUR PERSONAL DATA

Data is collected and processed for the internal purposes of the Charity, including: the work of the Charity; the making of grants or allocation of houses to eligible applicants; compliance with legal requirements; the maintenance of accurate records concerning the administration of the Charity, volunteers, beneficiaries, and applicants; the financial records of the Charity and personnel records of those employed by the Charity; the maintenance of correspondence records; the provision of necessary administrative support, training, or other services for the Charity; and such other work and ministry enjoined on the Charity from time to time by virtue of role or office within the Charity, or arising from statutory or other legal obligations under Irish law.

Specifically:

- For trustees: administration and compliance of the charity
- For residents: to facilitate residency

- For employees and volunteers: to facilitate their employment and work
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8. LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

We process your personal data on the following legal bases under Article 6 GDPR:

8.1 Contractual Necessity (Article 6(1)(b))

Processing is necessary to facilitate residency for residents and to perform our contractual obligations.

8.2 Legal Obligation (Article 6(1)(c))

Processing is necessary for compliance with the requirements of the law, including:

- Compliance with charity law and reporting obligations
- Tax and financial reporting requirements
- Health and safety obligations

8.3 Legitimate Interests (Article 6(1)(f))

Processing is necessary for the administration and compliance of the charity, including in the case of trustees, and to facilitate the employment and work of employees and volunteers.

Our legitimate interests include:

- Effective administration of the Charity
- Safeguarding residents and maintaining a safe living environment
- Managing trustee governance
- Managing employment relationships

8.4 Consent (Article 6(1)(a))

Where you have indicated that you are happy for the data provided to be processed in accordance with our Data Privacy Policy.

9. SPECIAL CATEGORIES OF PERSONAL DATA

We may collect and process special categories of personal data (sensitive personal data) as detailed in application forms and registration forms, including:

- Health information (where relevant to residency requirements)
- Religious beliefs (optional)
- Information about vulnerability or special needs

Special category data is processed only where provided by a data subject during completion of a confidential application form, which includes such consent as may

be required.

Legal Basis for Processing Special Categories of Data: We process special categories of personal data on the following legal bases:

- **Explicit consent** Where you have provided clear consent (Article 9(2)(a) GDPR)
- **Substantial public interest** for the provision of charitable housing services (Article 9(2)(g) GDPR and Section 54 Data Protection Act 2018)
- **Vital interests** where necessary to protect the life of a data subject (Article 9(2)(c) GDPR)

10. DATA SHARING AND DISCLOSURE

10.1 General Principle

We do not share your personal data with third parties except as outlined below.

10.2 Grant and Housing Verification

To verify eligibility for grants or housing, we may share relevant information with other grant awarding bodies or charities to whom the applicant has also applied.

10.3 Legal and Regulatory Authorities

We may share your personal data with:

- Revenue Commissioners (for tax and charitable status compliance)
- Charities Regulator
- Housing regulatory authorities
- Law enforcement agencies (where legally required)
- Courts or tribunals (in response to court orders or legal proceedings)

10.4 Service Providers

We may share data with trusted service providers who process data on our behalf, including:

- IT service providers
- Accountants and auditors
- Legal advisors

All service providers are required to maintain appropriate security measures and process data only in accordance with our instructions.

10.5 Other Disclosures

In addition to the above, we may disclose your personal data without your prior consent where:

- We are required to do so by law or regulation

- It is necessary to protect vital interests (for example, in a medical emergency or safeguarding situation)
- It is necessary to prevent or detect fraud or other criminal activity
- It is necessary to establish, exercise or defend legal rights

In all other circumstances, we will only disclose your personal data with your prior permission.

11. INTERNATIONAL DATA TRANSFERS

No data is transferred outside of the EU.

Should we need to transfer data outside the EU/EEA in future, we will ensure appropriate safeguards are in place in accordance with Chapter V GDPR, including Standard Contractual Clauses or adequacy decisions.

12. DATA SECURITY

The Trust takes all reasonable steps to implement appropriate technical and organisational security measures to protect your personal data against unauthorised or unlawful processing, accidental loss, destruction, or damage. These measures include: encryption of data in transit and at rest; secure access controls and authentication systems; regular security monitoring and testing; and restricted access to personal data on a need-to-know basis. We maintain physical and digital safeguards for our systems and facilities and require all employees and third-party service providers to maintain strict confidentiality. Our security measures are regularly reviewed and updated to ensure they remain appropriate to the nature of the personal data we process and the risks involved, taking into account current best practice in data security and the costs of implementation.

In the event of a personal data breach that is likely to result in a risk to your rights and freedoms, we will notify the Data Protection Commission within 72 hours of becoming aware of the breach. Where the breach is likely to result in a high risk to your rights and freedoms, we will also notify you without undue delay.

13. DATA RETENTION

We retain your personal data only for as long as necessary to fulfil the purposes for which it was collected and to comply with legal obligations.

13.1 Retention Periods

Our retention periods are as follows:

- Trustees: while the person continues as a trustee
- Residents' data: Duration of residency plus seven (7) years
- Employees' and volunteers' data: Duration of employment/volunteering plus one (1) year, then archived for a further six (6) years
- Financial records: six years from the end of the relevant financial year

Data is kept in respect of all applicants and enquirers for a period of six years following the end of their relationship with the Charity.

After the retention period expires, personal data will be securely deleted or anonymised.

14. YOUR RIGHTS AS A DATA SUBJECT

Under GDPR and Irish data protection law, you have the following rights:

14.1 Right of Access (Article 15 GDPR)

You have the right to access personal information held by the Charity (except confidential references and reports as excluded by legislation) by making an application to the Assistant Secretary.

You have the right to obtain:

- Confirmation that we are processing your personal data
- A copy of your personal data
- Information about how we process your data

14.2 Right to Rectification (Article 16 GDPR)

If on perusal of personal information it is found to be erroneous, application may be made to have it corrected.

We make every effort to ensure that data is accurate, complete and up-to-date.

14.3 Right to Erasure ('Right to be Forgotten') (Article 17 GDPR)

You have the right to request deletion of your personal data in certain circumstances, including where:

- The data is no longer necessary for the purposes for which it was collected
- You withdraw consent (where processing is based on consent)
- You object to processing and there are no overriding legitimate grounds
- The data has been unlawfully processed

This right is subject to exceptions, including where we need to retain data to comply with legal obligations.

14.4 Right to Restriction of Processing (Article 18 GDPR)

You have the right to request restriction of processing in certain circumstances, including where you contest the accuracy of the data or object to processing.

14.5 Right to Data Portability (Article 20 GDPR)

Where processing is based on consent or contract and is carried out by automated means, you have the right to receive your personal data in a structured, commonly used, and machine-readable format and to transmit it to another controller.

14.6 Right to Object (Article 21 GDPR)

You have the right to object to processing based on legitimate interests or for direct marketing purposes.

14.7 Rights Related to Automated Decision-Making (Article 22 GDPR)

We do not engage in automated decision-making or profiling that produces legal or similarly significant effects.

14.8 Right to Withdraw Consent

Where processing is based on consent, you have the right to withdraw consent at any time. This will not affect the lawfulness of processing based on consent before its withdrawal.

14.9 How to Exercise Your Rights

To exercise any of these rights, please contact:

- **Email:** secretary@corkchurchofireland.com
- **Address:** The Secretary, Kingston Charity Trust, St. Nicholas' House, 14 Cove Street, Cork, T12 RP40
- **Telephone:** +353 21 500 5080

We will respond to your request within one month, which may be extended by two further months where necessary, taking into account the complexity and number of requests.

15. RIGHT TO LODGE A COMPLAINT

You have the right to lodge a complaint with the Data Protection Commission if you believe we have not complied with data protection law.

Data Protection Commission

- **Address:** 21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland
 - **Telephone:** +353 (0)1 765 0100 / +353 (0)761 104 800
 - **Email:** info@dataprotection.ie
 - **Website:** www.dataprotection.ie
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16. CONFIDENTIAL REFERENCES

The Charity seeks confidential references or reports only at the time of application for a grant residency or employment, or on occasions for which prior permission has been obtained.

Confidential references and reports are excluded from access rights as permitted by legislation.

17. ACCURACY OF DATA

Every effort is made to ensure that data is accurate, complete and up-to-date.

Residents confirm that all information supplied in application and registration forms is accurate and true.

Any significant changes in the information provided should be notified to the Secretary of the Trust by requesting a new form for completion.

18. AUTOMATED DECISION-MAKING

The Trust does not use automated decision-making or profiling in relation to your personal data. All decisions regarding applications for residency, grants, or other matters are made by authorised personnel with appropriate oversight.

19. CCTV MONITORING

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. Kingston College of Mitchelstown, County Cork, has a relevant policy in place covering CCTV usage.

20. DATA PROTECTION BY DESIGN AND BY DEFAULT

We implement appropriate technical and organisational measures to ensure that,

by default, only personal data which is necessary for each specific purpose is processed. This applies to the amount of data collected, the extent of processing, the period of storage, and accessibility.

21. CHANGES TO THIS PRIVACY STATEMENT

This policy is reviewed annually.

We may update this Privacy Statement from time to time to reflect changes in our practices or legal requirements. The updated version will be indicated by an updated "Last Updated" date at the top of this Privacy Statement. We encourage you to review this Privacy Statement periodically.

22. CONTACT US

If you have any questions about this Privacy Statement or our data protection practices, please contact:

The Secretary

Kingston Charity Trust

St. Nicholas' House

14 Cove Street

Cork, T12 RP40

Telephone: +353 21 500 5080

Email: secretary@corkchurchofireland.com

Date Adopted: 22 October 2021

Last Reviewed: January 2026
