

LAPP'S CHARITY, CORK

RCN 20000837 CHY 548 AHBRA: AHB-02991

St. Nicholas' House, 14 Cove Street, Cork, T12 RP40

Telephone: +353 21 500 5080 EMail: secretary@corkchurchofireland.com

PRIVACY STATEMENT

Last Updated: January 2026

1. INTRODUCTION

Lapp's Charity, Cork ('the Trust'), including its officers, employees and sub-committees, is committed to the proper processing of data in a manner consonant with the Data Protection Acts 1988 to 2018 and the General Data Protection Regulation (the "GDPR") (together the "Legislation").

The Trust is the data controller for the personal data it processes. This means 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

Lapp's Charity (Incorporated) is the data controller responsible for your personal data.

Contact Details for Data Protection Queries:

- **Data Controller:** Lapp's Charity (Incorporated)
 - **Address:** St. Nicholas' House, 14 Cove Street, Cork, T12 RP40
 - **Email:** secretary@corkchurchofireland.com
 - **Telephone:** +353 21 500 5080
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3. POLICY

This Data Privacy Policy ("Policy") has been developed to ensure any persons whose personal data the Trust 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 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 Lapp's Charity 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^[AB1], 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 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 Trust, 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, explicit 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 using appropriate technical or organisational measures;
 7. The Trust shall be responsible for and be 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 (the Trust employs two 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.

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

Personal Information:

- Surname, Christian Name/s, Title/s
- Date of Birth and place of birth
- Address including Eircode
- Telephone and/or fax numbers
- Numbers or addresses for contact by WhatsApp or similar applications where this has the prior agreement of the participants
- Email addresses
- PPS Number (for residents and applicants)

- Religious denomination
- Current and previous occupation and employment details
- Employer name, address and contact details

Financial Information:

- 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

Residency-Related Information:

- Information about grant assistance given
- Accommodation preferences
- Current accommodation details
- Utility bill information
- Identity verification documents

Family and Emergency Contact Information:

- Next of kin details (names, addresses, contact information)
- Emergency contact details
- Legal representative details

References:

- Referee names, occupations, addresses and contact details

Other Information:

- 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
 - Together with such formal correspondence as may occur with the data subject from time to time
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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 which an applicant for a grant from the Trust may have applied.

7. HOW WE USE YOUR PERSONAL DATA

Data is collected and processed for the internal purposes of the Trust (together with its committees and delegated structures) for the following purposes: the charitable activities of the Trust; compliance with the requirements of the law of the State and the internal law of the Church of Ireland; to notify of changes to our services, events and role holders; to send you communications that 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; and to pay expenses or make similar payments.

Specifically: in the case of trustees, for the administration and compliance of the charity; in the case of residents, to facilitate residency; and in the case of employees and volunteers, to facilitate their employment and work.

The maintenance of accurate records concerning: the administration of the Trust; the financial records of the Trust; the officers and members of committees of the Trust; the implementation of Safeguarding, including the National Vetting Bureau process; statistical analysis and strategic review of the work of the Trust; the maintenance of a record of correspondence received and sent by the Trust, its employees and any other Trust committees in relation to any of the aforementioned people; the provision of necessary administrative support, training, or other services within the Trust; and such other work and ministry enjoined on the Trust from time to time by virtue of their role or office within the Trust or arising from statutory obligation or other obligations stemming from the law of Ireland or from the law of the Church of Ireland.

Additional purposes include:

- **Assessment of applications:** Processing applications for residency, including verification of information and obtaining references
- **Safeguarding:** Ensuring the safety and welfare of residents and compliance with safeguarding obligations
- **Property management:** Managing and maintaining the Trust's properties and facilities

- **Emergency response:** Contacting next of kin or emergency contacts when necessary
 - **Legal compliance:** Meeting obligations under charity law, housing law, tax law, and other applicable legislation
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8. LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

There are six lawful bases for processing personal data. Primarily, the personal data collected by the Trust from you is collected for the legitimate interest of the Trust.

Your data may also be processed by the Trust: with your consent; to meet legal obligations; because you have entered a contract with the Trust; in your vital interests; or to fulfil a public task.

The specific legal bases we rely on are:

For Applicants and Residents:

- **Contract:** Processing necessary for the performance of the residency agreement or to take steps at your request prior to entering into such agreement
- **Legitimate interests:** Assessment of applications, administration of residency, and management of the Trust's charitable activities
- **Legal obligation:** Compliance with charity law, tax law, and other statutory requirements
- **Vital interests:** In emergency situations affecting your health or safety

For Trustees:

- **Legal obligation:** Compliance with charity law and corporate governance requirements
- **Legitimate interests:** Administration and governance of the Trust

For Employees and Volunteers:

- **Contract:** Performance of employment contracts
 - **Legal obligation:** Compliance with employment law, tax law, and safeguarding requirements
 - **Legitimate interests:** Management and administration of the workforce
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9. SPECIAL CATEGORY (SENSITIVE) PERSONAL DATA

The data we process is likely to constitute sensitive personal data because, as a Trust 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.

We process special category data on the following legal bases:

- Explicit consent (where obtained)
- Processing necessary for reasons of substantial public interest
- Processing necessary for the establishment, exercise or defence of legal claims
- Processing relating to personal data manifestly made public by the data subject

Safeguarding Information

In the case of workers in the Trust 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; and record of having attended child and adult safeguarding training.

10. DATA SHARING AND DISCLOSURE

Personal data may be disclosed internally within the Trust in accordance with the data protection principles and this Policy.

No data is disclosed to a third party, other than that required by the Charities Regulator, or when a reference is required from an officer of the Trust 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.

The Trust may share your personal data with the following categories of third parties:

- **Regulatory bodies:** The Charities Regulator, Revenue Commissioners, and other statutory bodies as required by law
- **Professional advisers:** Legal advisers, accountants, and auditors for the purposes of obtaining professional advice

- **Service providers:** IT service providers, maintenance contractors, and other service providers who process data on our behalf under strict contractual obligations
- **Referees and references:** Where you have provided referee details on your application form, we will contact them to obtain references
- **Financial institutions:** For the purposes of processing payments and grants
- **Healthcare providers:** Where necessary for safeguarding or emergency purposes
- **Emergency contacts and next of kin:** In emergency situations or where necessary for your welfare

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 information from the Trust 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 Trust 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 Trust may also provide information for the purpose of safeguarding national security, when required to do so by law (for example under a court order), or when transferring data to legal counsel where same is necessary for the defence of legal claims. In the case of any such disclosure, the Trust will do so only in accordance with the Legislation.

11. INTERNATIONAL DATA TRANSFERS

No data is transferred outside of the EU. Any electronic personal data transferred to countries or territories outside the EEA will only be considered if there is an adequacy decision, which means that the European Commission has decided that a third country or an international organisation ensures an adequate level of data protection. Alternatively, transfers may be made once appropriate safeguards have been put in place. This might include a Standard Contractual Clause or Binding Corporate Rules.

In the unlikely event that we need to transfer data outside the EEA in the future, we will:

- Ensure an adequacy decision is in place, or
- Implement appropriate safeguards such as Standard Contractual Clauses approved by the European Commission, or
- Obtain your explicit consent for the transfer

We will inform you of any such transfers and the safeguards in place.

12. DATA SECURITY

The Trust will take 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 the state of the art 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, the Trust 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

The period for which the Trust 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, the Trust 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 set out in the table below:

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 Trust - period of limitation within which individuals can bring proceedings against the Trust 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 or provision of residence	Date of application for residence or the date on which the last payment is made	The duration of residence plus one (1) year, then archived for a further six (6) years	The accountability of the Trust as a charity in the exercise of charitable functions and compliance with limitation periods
Bank account details	The date on which the last payment (of an expense or grant) is made	Seven (7) years	The accountability of the Trust as a charity in the exercise of charitable functions

Financial records	End of financial year	Six (6) years	Legal and regulatory compliance, charity accountability
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 as a religious organisation, and participation therein, and to vouch for eligibility to hold office, or otherwise, within the Trust
Data and records that arise from the Safeguarding of children	N/A	Indefinitely	As required by Safeguarding Trust
Trustees' data	Cessation of trusteeship	While the person continues as a trustee, then seven (7) years after cessation	Governance, accountability and legal compliance
Employee and volunteers' data	End of employment/volunteering	Duration of employment/volunteering plus one (1) year, then archived for a further six (6) years	Employment law compliance and accountability
Application forms (unsuccessful applications)	Date of decision	Two (2) years	Record-keeping and potential future applications
Reference requests and responses	Date received	Duration of residency plus seven (7) years	Accountability and legal compliance

14. YOUR RIGHTS AS A DATA SUBJECT

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

1. **Right to be informed:** Your right to be informed about the collection and use of your personal data by the Trust
2. **Right of access:** Your right to request from the Trust access to a copy of your personal data, commonly referred to as a subject access request (SAR)
3. **Right to rectification:** Your right to have inaccurate personal data rectified or completed if it is incomplete
4. **Right to data portability:** Your right to data portability, to have your personal data copied or transferred from one IT environment to another in a safe and secure way without affecting its usability
5. **Right to object:** Your right to object to the processing of your personal data (applies only in certain circumstances)
6. **Right to restriction:** Your right to request the restriction or suppression of your personal data (applies only in certain circumstances)
7. **Right to erasure:** Your right to have personal data erased (applies only in certain circumstances)
8. **Right regarding automated decision-making:** Your right to 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

Please note: These rights are not absolute and may be subject to limitations. For example:

- The right to erasure does not apply where we are required to retain data for legal or regulatory purposes
- The right to object may not apply where we have compelling legitimate grounds for processing
- The right to data portability only applies to data processed by automated means and where processing is based on consent or contract

Assertion of your rights shall not affect any rights which the Trust may have under the Legislation.

How to Exercise Your Rights:

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

You may also email your request to: secretary@corkchurchofireland.com

The Trust will confirm your request within 21 days of receipt, and process your request within 30 days of receipt. Where there is a significant volume of information, we may extend this period by a further two months. If the information the Trust holds about you is inaccurate, the Trust 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.

We will not charge a fee for processing your request unless it is manifestly unfounded, excessive or repetitive, in which case we may charge a reasonable administrative fee or refuse to process the request.

15. RIGHT TO LODGE A COMPLAINT

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

You may also email complaints to: secretary@corkchurchofireland.com

We will acknowledge your complaint within five (5) working days and aim to provide a full response within 30 days.

As a data subject you also have the right to lodge a complaint with the Data Protection Commission at: Canal House, Station Road, Portarlinton, R32 AP23, Co. Laois or by visiting www.dataprotection.ie.

You may also contact the Data Protection Commission at:

- **Telephone:** +353 57 868 4800 / 1890 252 231
- **Email:** info@dataprotection.ie
- **Website:** www.dataprotection.ie

16. 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 Trust of any changes in your personal details. We endeavour to ensure personal information held by the Trust is up to date and accurate.

If admitted as a resident, you will be required to complete a registration form to provide additional information and to update that information from time to time,

or in the event of a change in any of the information provided.

17. 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. Lapp's Charity (Incorporated) of St. Nicholas' House, 14 Cove Street, Cork has a relevant policy in place covering CCTV usage.

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. CHANGES TO THIS PRIVACY STATEMENT

We may update this Privacy Statement from time to time to reflect changes in our practices, legal requirements, or for other operational, legal or regulatory reasons. We will notify you of any material changes by:

- Posting the updated Privacy Statement on our website (if applicable)
- Providing written notice to current residents and applicants
- Making the updated version available at our offices

The date of the most recent update will be shown at the end of this document.

20. CONTACT US

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

The Secretary

Lapp's Charity (Incorporated),
St Nicholas' House,
14 Cove Street,
Cork, T12 RP40

Telephone: +353 21 500 5080 |

Email: secretary@corkchurchofireland.com

21. 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.

Policy Originally Adopted: 12 October 2021 |

Last Reviewed: 25 May 2023 |

Current Version Updated: 27 January 2026 |

Next Review Date: January 2027
