

Saint Stephen's Protestant Orphan Society

RCN 20045296 CHY 14039

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

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

PRIVACY STATEMENT

Last Updated: 28 January 2026

1. INTRODUCTION

The Saint Stephen's Protestant Orphan Society, including the Grants Committee, 'the Society', (its officers, employees and sub-committees) are committed to the proper processing of data in compliance with the Data Protection Acts 1988–2018 and the General Data Protection Regulation ("**GDPR**") (together, the "**Legislation**").

The Society is a registered charity whose charitable objects include the advancement of education, the advancement of community welfare including the relief of those in need by reason of youth, age, ill-health, or disability, and other purposes that are of benefit to the community.

The Society 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

Saint Stephen's Protestant Orphan Society is the data controller responsible for your personal data.

Contact Details for Data Protection Queries:

- **Data Controller:** The Governors of Saint Stephen's Protestant Orphan Society
- **Contact Address:** St. Nicholas' House, 14 Cove Street, Cork, T12 RP40
- **Contact Email:** secretary@corkchurchofireland.com
- **Contact Telephone:** +353 21 500 5080

3. POLICY

This Data Privacy Policy ("Policy") has been developed to ensure any 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 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 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 [\[AB1\]](#).

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 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, 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 Society 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 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.

The Society processes personal data relating to the following categories of data subjects:

- Trustees of the Society;
- Grant applicants and beneficiaries (parents/guardians and children);
- Sponsoring clergy persons;
- Officers, employees, volunteers and committee members of the Society;
- Donors and supporters.

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

Basic Contact and Identification Information:

- Surname, Christian Name/s, Title/s
- Date 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
- Email address/es

Financial Information:

- Information about grant assistance given
- Bank account details (to facilitate electronic payment of expenses and grants)
- 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

- Financial information collected via grant application forms including: taxable income, tax assessments, social welfare receipts, maintenance payments, capital assets, mortgage interest, rent payments, loan repayments, and school fees

Demographic and Family 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
- Information about family members including details of parents/guardians, dependent children, employment status, profession/occupation, and PPS numbers

Education Information:

- Details of schools/colleges attended, whether day or boarding, educational tours and activities
- Information about other grants applied for or received from other charitable bodies

Supporting Documentation:

- Copies of marriage certificates, birth certificates, death certificates, and references from clergy
- Tax self-assessments, receipts of earnings from Revenue Commissioners, and summaries of payments from the Department of Social Protection

6. HOW WE COLLECT YOUR PERSONAL DATA

Data is collected electronically and via paper application forms.

Data may also be collected from third parties, such as schools attended by applicants and other bodies to whom an applicant may have made an application.

7. HOW WE USE YOUR PERSONAL DATA

Data is also collected and processed for the internal purposes of the Society (together with its committees and delegated structures) for the following purposes:

- The charitable activities of the Society
- 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 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
- In the case of trustees, for the administration and compliance of the charity; in the case of beneficiaries, to award grants
- To pay expenses or make similar payments
- The maintenance of accurate records concerning: the administration of the Society; the financial records 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 any other Charity 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
- To investigate applications and to visit applicants where the Grants Committee reserves the right to do so

The Society may pay grants directly to schools and manage overpayments where grants from multiple sources exceed school fees.

8. LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

Under GDPR, the Society must have a lawful basis for processing personal data. There are six lawful bases for processing personal data. Primarily, the personal data collected by the Society from you is collected for the legitimate interest of the Society.

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

The Society processes personal data on the following specific lawful bases:

For Grant Applicants and Beneficiaries:

- **Legitimate interests:** To provide assistance for the education, clothing, and maintenance board and lodging or education alone, for orphans or children of necessitous parents, one of whom is or may have been Protestant, and to advance in life deserving retarded or handicapped children whose circumstances are such that they need assistance
 - **Consent:** Where you have given consent for your information to be held and processed in accordance with the Data Protection Policy of the St Stephen's Protestant Orphan Society
 - **Legal obligation:** To comply with charity law and reporting requirements
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9. SPECIAL CATEGORY (SENSITIVE) PERSONAL DATA

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

Correspondence:

- Together with such formal correspondence as may occur with the data subject from time to time

We process **Special Category Data** on the following legal basis:

- **Explicit consent:** Where you have provided explicit consent for processing special category data
- **Substantial public interest:** Processing is necessary for the purposes of the Society's charitable activities
- **Vital interests:** Where necessary to protect the vital interests of data subjects who are physically or legally incapable of giving consent

Safeguarding Information:

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
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10. DATA SHARING AND DISCLOSURE

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

Data is not shared with third parties, except in the following circumstances:

- When required by the Charities Regulator;
- When a reference is required from an officer of the Society arising from an activity of the data subject;
- Where you have given consent to the Grants Committee to contact schools mentioned in your application;
- Where you have given consent to the Grants Committee to contact other charities/grant-making bodies to which you have referred in your application;
- Where the Society liaises with other charitable institutions, educational establishments, Government bodies and other relevant bodies in accordance with this data protection policy;
- 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 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.

11. INTERNATIONAL DATA TRANSFERS

No data is transferred outside of the EU. However, should circumstances change and international transfers become necessary, 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 such circumstances, we will:

- Ensure that the transfer is to a country recognised by the European Commission as providing adequate protection
 - Implement appropriate safeguards such as Standard Contractual Clauses approved by the European Commission
 - Obtain your explicit consent where required
 - Inform you of the transfer and the safeguards in place
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12. DATA SECURITY

The Society will 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 restricted access to personal data on a need-to-know basis.

We maintain physical and digital safeguards for our systems and facilities, conduct regular staff training on data protection and security practices, 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 Society will:

- Notify the Data Protection Commission within 72 hours of becoming aware of the breach
- Notify affected individuals without undue delay where the breach is likely to result in a high risk to their rights and freedoms
- Document all data breaches, including the facts, effects and remedial action taken
- Take appropriate measures to address the breach and mitigate any adverse effects

13. DATA RETENTION

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, the 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 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 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 in the exercise of charitable functions
Bank account details	The date on which the last payment (of an expenses or grant) is made	Seven (7) years	The accountability of the Society as a charity in the exercise of charitable functions

Financial records	End of financial year	Seven (7) years	Compliance with charity and tax law requirements
Trustees' data	Date person ceases to be a trustee	Seven (7) years	Administration and compliance of the charity
Grant applications	Date person is no longer a grant recipient	Seven (7) years	Accountability and compliance
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 Society
Data and records that arise from the Safeguarding of children	N/A	Indefinitely	As required by Safeguarding Trust

14. YOUR RIGHTS AS A DATA SUBJECT

The Society 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 Society
2. **Right of access:** Your right to request from the Society 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 erasure ('right to be forgotten'):** Your right to have personal data erased (applies only in certain circumstances)

This right is not absolute and only applies in certain circumstances, including:

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

- The personal data must be erased to comply with a legal obligation

This right may not apply where retention is necessary for:

- Compliance with legal obligations
 - The establishment, exercise or defence of legal claims
 - Archiving purposes in the public interest
5. **Right to restrict processing:** Your right to request the restriction or suppression of your personal data (applies only in certain circumstances)
 6. **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
 7. **Right to object:** Your right to object to the processing of your personal data (applies only in certain circumstances)
 8. **Rights related to 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

The Society does not currently engage in automated decision-making or profiling.

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

HOW TO EXERCISE YOUR RIGHTS

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.

You may also contact us by email at: secretary@corkchurchofireland.com.

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 two months. Where an extension is required, we will inform you within one month of receipt of your request and explain the reasons for the delay.

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.

The Society will not charge a fee for processing your request unless it is manifestly unfounded, excessive or repetitive, in which case a reasonable administrative fee may be charged.

15. RIGHT TO LODGE A COMPLAINT

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.

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

We will acknowledge your complaint within 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 Commissioner at: Canal House, Station Road, Portarlington, R32 AP23, Co. Laois or by visiting www.dataprotection.ie.

You can also contact the Data Protection Commission by:

- **Telephone:** +353 57 868 4800 or Lo Call 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 Society of any changes in your personal details. We endeavour to ensure personal information held by the Society is up to date and accurate.

If you become aware that any personal data we hold about you is inaccurate or incomplete, please contact us immediately so that we can rectify the information.

17. AUTOMATED DECISION-MAKING AND PROFILING

The Society does not engage in automated decision-making or profiling activities. All decisions regarding grant applications and awards are made by the Grants Committee following human review and assessment of applications.

18. CHILDREN'S DATA

The Society processes personal data relating to children as part of its charitable activities to provide educational grants and support. Where we process children's data:

- We will obtain consent from parents/guardians as required
 - We will ensure that information provided to children about data processing is clear, accessible and age-appropriate
 - We will implement appropriate safeguards to protect children's data
 - We will comply with all safeguarding requirements and policies
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19. CONTACT US

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

The Secretary,
Saint Stephen's Protestant Orphan Society ,
St. Nicholas' House,
14 Cove Street,
Cork, T12 RP40

Telephone: +353 21 500 5080

Email: secretary@corkchurchofireland.com

20. 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 Adopted: 12 October 2021

Last Reviewed: 28 January 2026

Next Review Date: January 2027

