

The Southwell Charity

RCN 20201926 CHY 22360

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

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

This Privacy Statement explains how the Charity collects, uses, and protects personal information in accordance with applicable data protection laws.

This statement applies to all personal data processed by the Charity, whether collected directly from individuals or obtained from other sources.

2. DATA CONTROLLER

Southwell Charity is the data controller responsible for your personal data.

Contact Details for Data Protection Queries:

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

3. POLICY

This Data Privacy Policy ("Policy") has been developed to ensure any persons whose personal data the Charity may hold can 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 Charity, 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 Charity 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 Charity 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 Charity, its employees, agents, contractors, volunteers, office holders or other parties working on behalf of the Charity.

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

The Trustees of Southwell Charity have collective responsibility for ensuring compliance with this Policy and for the Charity's obligations under the Legislation. The Bishop of Cork, Cloyne and Ross, as a trustee of the Charity, 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 that the Charity, as data controller must process all personal data in accordance with the following seven core principles:

1. **Lawfulness, Fairness and Transparency:** Personal data is processed lawfully, fairly, and transparently.
2. **Purpose Limitation:** Personal data is collected for specified, explicit, and legitimate purposes and not further processed in a manner incompatible with those purposes
3. **Data Minimisation:** Personal data is adequate, relevant, and limited to what is necessary.
4. **Accuracy:** Personal data is accurate and kept up to date.
5. **Storage Limitation:** Personal data is kept in a form which permits identification of data subjects for no longer than is necessary.
6. **Integrity and Confidentiality:** Personal data is processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.

7. **Accountability:** The Charity is accountable for compliance with these principles.
-

5. TYPES OF PERSONAL DATA WE COLLECT

The Charity 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 Charity processes the following categories of personal data:

5.1.Trustees:

Names, contact details (address, telephone number, email), and administrative information necessary for the governance of the Charity.

5.2.Beneficiary Institutions:

Institution name, contact details, bank account details for the purpose of making grants, and financial records relating to grants awarded.

No sensitive data is collected or processed other than that by virtue of being on the diocesan database, the religious affiliation of the data subject might be inferred.

6. HOW WE COLLECT YOUR PERSONAL DATA

Data is collected electronically and on paper in the case of tax forms.

7. HOW WE USE YOUR PERSONAL DATA

Data are collected and processed for the internal purposes of the Charity (together with its committees and delegated structures) for the following purposes: the charitable activities of the Charity; 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; and to pay expenses or make similar payments.

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

The maintenance of accurate records concerning: the administration of the Charity; the financial records of the Charity; the officers and members of committees of the Charity; the implementation of Safeguarding, including the National Vetting Bureau process; statistical analysis and strategic review of the work of the Charity; the maintenance of a record of correspondence received and sent by the Charity, 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 Charity; and such other work and ministry enjoined on the Charity from time to time by virtue of their role or office within the Charity or arising from statutory obligation or other obligations stemming from the law of Ireland or from the law of the Church of Ireland.

8. LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

The Charity processes personal data on the following lawful bases:

- Consent of the data subject,
- Performance of a contract,
- Compliance with a legal obligation,
- Protection of vital interests,
- Performance of a task carried out in the public interest,
- Legitimate interests pursued by the Charity or a third party.

Personal data is processed for the following purposes:

- 1) **Charitable Activities:** To carry out the Charity's objects, including the relief of poverty, economic hardship, and distress; the provision of housing or assistance with housing costs; the provision of nursing, medical, or health-related support; and the promotion of community welfare and social inclusion.
- 2) **Legal and Regulatory Compliance:** To comply with legal and regulatory obligations, including those imposed by the Charities Regulator and tax authorities.
- 3) **Governance and Administration:** To manage the Charity's trustees, maintain records, and ensure effective governance.

- 4) Financial Management: To process grants, manage bank accounts, and maintain financial records.
 - 5) Communication: To respond to enquiries and maintain appropriate communication with beneficiaries and other stakeholders.
 - 6) Record Keeping: To maintain accurate and up-to-date records in accordance with legal and regulatory requirements.
 - 7) Statistical Analysis: To analyse the effectiveness of the Charity's activities and inform decision-making.
 - 8) Legal Proceedings: To establish, exercise, or defend legal claims.
-

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.

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

No data are shared with third parties, except as required by the Charities Regulator for regulatory compliance purposes, or when there is a legal or statutory obligation to do so.

The Charity may disclose personal data to its legal advisors where necessary for the purpose of obtaining legal advice or in connection with legal proceedings. Personal data may also be disclosed where required by a court order or other legal obligation.

11. INTERNATIONAL DATA TRANSFERS

No data are 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 Charity 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, 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

The period for which the Charity 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 Charity will retain information no longer than is necessary for the purposes for which the data was 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 Charity - 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

Bank account details	The date on which the last payment (of an expense or grant) is made	Seven (7) years	The accountability of the Charity 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 Charity
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

After the applicable retention period has expired, personal data will be securely deleted or anonymised.

14. YOUR RIGHTS AS A DATA SUBJECT

The Charity 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 Charity
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 Charity may have under the Legislation.

How to Exercise Your Rights:

If you want to know what personal information the Charity holds about you or exercise any of the above rights, you can do so by making your specific request in

writing to the Charity at the following address: Diocesan Office, St Nicholas House, 14 Cove Street, Cork Y12 RP40.

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

The Charity 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 Charity holds about you is inaccurate, the Charity 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. Where a data subject requests access to their personal data, the Charity will provide a copy of the personal data undergoing processing, together with information about the processing.

The Charity will not charge a fee for processing a subject access request unless the request is manifestly unfounded or excessive, particularly if it is repetitive. In such cases, the Charity may charge a reasonable fee or refuse to act on the request.

15. RIGHT TO LODGE A COMPLAINT

If a data subject is dissatisfied with the manner in which the Charity has processed their personal data, they may raise a complaint with the Charity by writing to the following address: Diocesan Office, St Nicholas House, 14 Cove Street, Cork Y12 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:

Portarlinton office, 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

The Charity takes reasonable steps to ensure that personal data is accurate and up to date. Data subjects are encouraged to inform the Charity of any changes to their personal information. The Charity will update or correct personal data upon request, provided that the request is reasonable and in accordance with data protection law.

17. AUTOMATED DECISION MAKING

The Charity does not engage in automated decision-making or profiling of data subjects.

18. CONTACT US

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

The Secretary

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

Telephone: +353 21 500 5080

Email: secretary@corkchurchofireland.com

19. REVIEW

This Privacy Statement will be reviewed periodically to ensure it remains accurate and up to date.

Policy Originally Adopted: 12th October 2021

Last reviewed: 25th May 2023

Current Version Updated: 28th January 2026

Next Review Date: January 2027