

# VICTORIA TRUST, CORK

RCN 20045296 CHY 14039

St. Nicholas' House, 14 Cove Street, Cork, T12 RP40  
Telephone: +353 21 500 5080 EMail: [secretary@corkchurchofireland.com](mailto:secretary@corkchurchofireland.com)

## PRIVACY STATEMENT

**Last Updated: January 2026**

---

### 1. INTRODUCTION

The Victoria Trust, Cork (the 'Trust') (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

**Victoria Trust** is the data controller responsible for your personal data.

#### Contact Details for Data Protection Queries:

- **Data Controller:** Victoria Trust
  - **Address:** St. Nicholas' House, 14 Cove Street, Cork, T12 RP40
  - **Email:** [secretary@corkchurchofireland.com](mailto: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 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 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 Victoria 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 has 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 organizational measures.
- 7) The Trust shall be responsible for and be able to demonstrate compliance with the above principles.

---

## 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.

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
- Date of Birth and place 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)
- Information about grant assistance given
- 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 dependents.
- 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 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.

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

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;
  - Record of having attended child and adult safeguarding training;
- 

## **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 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 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 Trust; 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 Trust 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 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.

---

## 8. LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

The Trust processes personal data for the following charitable objects:

(a) relief of poverty or economic hardship; (b) the advancement of religion; (c) the advancement of education; (d) advancement of community welfare, including the relief of those in need by reason of youth, age, ill-health or disability; and (e) promotion of religious or racial harmony and harmonious community relations.

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.
- to fulfil a public task.

Data is also 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 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

- o the administration of the Trust.
- o the financial records of the Trust.
- o the officers and members of committees of the Trust.
- o the implementation of Safeguarding, including the National Vetting Bureau process; and

- o 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.

Specifically, the data collected is used:

- In the case of trustees, for the administration and compliance of the Trust
- In the case of donors, for the purposes of an annual appeal
- In the case of beneficiaries, to award grants

---

## **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. Only staff and volunteers who require access to your information to perform their roles with respect to the purpose(s) for which it was collected and is being processed, can access it.

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

### **10.1 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)

### **10.2 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.

### **10.3 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.

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.

---

## **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:

<b>Category of User/Personal Data</b>	<b>Date from which Retention Period Starts</b>	<b>Retention Period</b>	<b>Purpose</b>
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, Trust 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

---

#### 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); and
- 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: Diocesan Office, St Nicholas House, 14 Cove Street, Cork, T12 RP40.

You may also email your request to: [secretary@corkchurchofireland.com](mailto:secretary@corkchurchofireland.com)

The Trust 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 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](mailto: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 Commissioner at: Portarlinton office, Canal House, Station Road, Portarlinton, R32 AP23, Co. Laois or by visiting [www.dataprotection.ie](http://www.dataprotection.ie).

You may also contact the Data Protection Commission at:

- **Telephone:** +353 57 868 4800 / 1890 252 231
  - **Email:** [info@dataprotection.ie](mailto:info@dataprotection.ie)
  - **Website:** [www.dataprotection.ie](http://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.

---

## 17. 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)
- Making the updated version available at our offices

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

---

## 18. CONTACT US

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

### **The Secretary**

Victoria Trust

St. Nicholas' House

14 Cove Street

Cork, T12 RP40

**Telephone:** +353 21 500 5080

**Email:** [secretary@corkchurchofireland.com](mailto:secretary@corkchurchofireland.com)

---

## 19. 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.

**Date:** 26 May 2021

**Last Reviewed:** 15 May 2024

**Current Version:** 27 January 2026

**Next Review Date:** January 2027

---