

Douglas Union with Frankfield

DATA PROTECTION POLICY

Last Revision: 29th June 2020

Introduction

At Douglas Union with Frankfield privacy and data protection rights are very important to us.

This policy is in place under the **Data Protection Act 1998 - 2003** and the **General Data Protection Regulation (GDPR) 2018** which comes into effect on 25 May 2018. All personal data will be maintained in accordance with the obligations of the Act and the Regulation to ensure that it is processed lawfully, fairly and in a transparent manner.

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 Data Protection Acts 1988 and 2003 (the “Data Protection Acts”) and the GDPR 2018 lay down strict rules about the way in which personal data and sensitive personal data are collected, accessed, used and disclosed. The Data Protection Acts and the GDPR 2018 also permit individuals to access their personal data on request, and confer on individuals the right to have their personal data amended if found to be incorrect. This document outlines Douglas Union with Frankfield’s policy to help ensure that we comply with the Data Protection Acts and the GDPR 2018.

Inquiries about this Data Protection Policy should be made to: **Data Protection Co-Ordinator, The Rectory, Carrigaline Road, Douglas, Cork.**

Data Protection Policy

1. Purpose of This Policy

This policy is a statement of Douglas Union with Frankfield's commitment to protect the rights and privacy of individuals in accordance with the Data Protection Acts 1998-2003 and the GDPR 2018.

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 Data Protection Acts 1988 and 2003 (the "Data Protection Acts") and the GDPR 2018 lay down strict rules about the way in which personal data and sensitive personal data are collected, accessed, used and disclosed. The Data Protection Acts and the GDPR also permit individuals to access their personal data on request, confers on individuals the right to have their personal data amended if found to be incorrect and the right to have their personal data forgotten or deleted.

Douglas Union with Frankfield is firmly committed to ensuring personal privacy and compliance with the Data Protection Acts and the GDPR, including the provision of best practice guidelines and procedures in relation to all aspects of Data Protection.

This document outlines the parish's policy to help ensure that we comply with the Data Protection Acts and the GDPR.

Inquiries about this Data Protection Policy should be made to: Data Protection Co-Ordinator, The Rectory, Carrigaline Road, Douglas, Cork.

2. Scope

The policy applies to the keeping and processing of personal data, both in manual form and on computer, including personal data held on parish clergy, parishioners and staff.

Data: means information in a form which can be processed. It includes automated data (information on computer or information recorded with the intention of putting it on computer) and manual data (information that is kept as part of a relevant filing system, or with the intention that it should form part of a relevant filing system).

Relevant filing system: means any set of information that, while not computerised, is structured by reference to individuals, or by reference to criteria relating to individuals, so that specific information relating to a particular individual is readily accessible.

Personal data: means data relating to a living individual who is or can be identified from the data or from the data in conjunction with other information that is in, or is likely to come into, the possession of the data controller.

Data Controller: A data controller is the individual or legal entity which controls the contents and use of personal data. Douglas Union with Frankfield can be considered to be the data controller, with the Data Protection Co-Ordinator acting for the parish in exercising the functions involved.

Data Protection Co-Ordinator: A data protection co-ordinator is the individual who acts for the parish in exercising the functions of the Data Controller. For Douglas Union with Frankfield this is the Rector.

To whom will the policy apply? The policy applies to all clergy, staff, volunteers, members of the Select Vestry, parishioners, the Christian Stewardship Recorders, and others insofar as the measures under the policy relate to them.

3. Collecting Information

We collect and use information for the following purposes:

- To enable the parish clergy to contact and provide pastoral care for the parishioners.
- To enable the parish to coordinate volunteer rotas (e.g. ministers of the Eucharist, flower arrangers, readers, fundraising volunteers).
- To communicate with parishioners about what is happening in the parish or activities associated with the parish's life and witness in the wider community.
- To implement child protection measures under the Church of Ireland's *Safeguarding* Trust programme.
- To facilitate communication amongst members of the Select Vestry.
- To facilitate any personnel and payroll administration for any staff working for the parish.
- To enable parishioners to be contacted and to provide a record of Christian Stewardship/Planned Giving.
- To enable compliance with Charities Regulation Legislation and to reclaim tax on Planned Giving.
- To provide in certain circumstances, and for specific purposes data which has to be shared with the Diocesan Council, the Bishop, and the Church of Ireland centrally.

4. Data Protection Principles

We shall perform our responsibilities under the Data Protection Acts and the GDPR in accordance with the following Data Protection principles:

(i) Obtain and process information fairly

We shall

- obtain and process personal data fairly and in accordance with statutory and other legal obligations. From 25th May 2018, consent to hold personal data for particular purposes will be sought from new parishioners or new participants in parish activities.
- keep personal data only for one or more specified, explicit and lawful purposes
- keep personal data for purposes that are specific, lawful and clearly stated. Personal data will only be processed in a manner compatible with these purposes as defined in the company personal data usage matrix.

(ii) Use and disclose only in ways compatible with these purposes

We shall use and disclose personal data only in circumstances that are necessary for the purposes for which we collected the data. The only exception to this is in the specific circumstances where we are mandated to do so by law.

(iii) Keep it safe and secure

We shall take appropriate security measures against unauthorised access to, or alteration, disclosure or destruction of personal data and against its accidental loss or destruction.

(iv) Keep it accurate, complete and up-to-date

We adopt procedures that ensure high levels of data accuracy, completeness and that data is up-to-date.

(v) Ensure it is adequate, relevant and not excessive

We shall only hold personal data to the extent that it is adequate, relevant and not excessive.

(vi) Retain for no longer than is necessary

We have a retention policy for personal data.

(vii) Give a copy of his/her personal data to an individual, on request

We adopt procedures to ensure that data subjects can exercise their rights under the Data Protection legislation to access their data.

(vii) Delete personal data from our systems when appropriate

We will delete an individual's personal data from our systems when requested to do so or when it is not longer needed by us for the stated purpose(s).

5. Personal Data Records

The personal data records held by the Parish may include the following:

Staff Records:

These may include:

- name, address, contact details, banking details and PPS number
- records of application and appointment
- details of work record (qualifications, work undertaken, material taught etc)
- details of complaints and/or grievances including consultations or competency discussions, action/improvement/evaluation plans and record of progress. Note: a record of grievances may be maintained which is distinct from and separate to individual personnel files.

Format: The format for these records can be either as a manual record (personal file within filing system) or a computer record or both.

Access: The totality of these records can only be accessed by the Rector (or the person delegated by him/her or the Bishop who has responsibility for the incumbency in his/her absence or during a vacancy in the Incumbency). The Honorary Treasurer can access only the name, address, contact details, banking details and PPS number of staff.

Parishioner /Household Records:

These may include:

- name, address, marital status and contact details
- details of children's names, ages/dates of birth, dates of baptism and confirmation
- religious makeup of the household e.g. denomination of all in the household
- membership of parish committees
- pastoral notes (clergy records only)
- Church attendance records for the purpose of contact tracing as required during the COVID-19 pandemic. This includes names and phone numbers of visitors at Sunday services and those attending occasional services eg weddings and funerals. These are retained for a calendar month before being destroyed.

Format: The format for these records can be either as a manual record (personal file within filing system) or a computer record or both.

Access: The totality of these records can only be accessed by the Rector (or the person delegated by him/her or the Bishop who has responsibility for the incumbency in his/her absence or during a vacancy in the Incumbency) and the curate or any other clergy appointed to minister in the parish by the Bishop. Names, addresses and contact details only may be shared between members of the Select Vestry and its sub-committees to enable them to function or to inform parishioners about matters relevant to their particular functions and duties in the Douglas Union with Frankfield.

Christian Stewardship Records:

These may include:

- name, address, contact details and PPS number
- the ability to view incoming Standing Order payments on the Stewardship bank account statement.

Format: The format for these records can be either as a manual record (personal file within filing system) or a computer record or both.

Access: The totality of these records can only be accessed by the Stewardship Recorder and the Honorary Treasurer.

Select Vestry Records:

These may include:

- Name, address, contact details and date of birth of each member of the Select Vestry.
- Minutes of Select Vestry meetings and correspondence to or between members of the Select Vestry and its sub-committees which may include references to particular individuals.

Format: The format for these records can be either as a manual record (personal file within filing system) or a computer record or both.

Access: The totality of these records can only be accessed by the Rector (or the person delegated by him/her or the Bishop who has responsibility for the incumbency in his/her absence or during a vacancy in the Incumbency), the Honorary Treasurer and the Honorary Secretary.

Choir Records

These may include:

- Name, address, contact details of choir members.

Format: The format for these records can be either as a manual record (personal file within filing system) or a computer record or both.

Access: The totality of these records can only be accessed by the Choir Director.

Sunday School Records

These may include

- Name, address, contact details, date of birth.
- Attendance records.
- Medical information that it is necessary for Sunday School teachers to know while a child is in their care.
- Details of any allergies.

Access: The totality of these records can only be accessed by the Sunday School teachers, the Rector (or the person delegated by him/her or the Bishop who has responsibility for the incumbency in his/her absence or during a vacancy in the Incumbency), or members of the Parish Safeguarding Trust Panel.

Safeguarding Trust (Child Protection) Records

- Name, address, contact details, date of birth
- Identification documents required for Garda Vetting purposes
- Garda Vetting returns

Access: The totality of these records can only be accessed by the Rector (or the person delegated by him/her or the Bishop who has responsibility for the incumbency in his absence or during a vacancy in the Incumbency), the other members of the Safeguarding Trust Parish Panel and the General Synod Board of Education. Names, addresses and contact details will be shared with the Diocesan Office for purposes relating to voluntary workers and staff attending Safeguarding Trust training events and maintaining a register of vetted and trained voluntary and staff members for the Diocese.

Registers

These include:

- Baptism Records
- Confirmation Records
- Marriage Records
- Register of Vestry Members
- Burial Records

Format: The format for these records are manual records retained in the Parish safes.

Access: Access to such records are governed by the Church of Ireland's policy on the safekeeping of, access to and use of registers.

Rotas/Rosters

Rotas/rosters of members of the parish and its associated bodies may be drawn up from time to time, e.g. flower arranging, serving refreshments, readers lists, Ministers of the Eucharist, stewarding services etc.

These may include:

Name, email address, telephone number.

Format: The format for these records can be either as a manual record (personal file within filing system) or a computer record or both.

Access: The totality of these records can be accessed by members of the parish clergy and staff and may be displayed on church notice boards from time to time. Those on such rotas or rosters have permission to contact each other to arrange 'swaps' or changes to them.

6. Updating Data

Personal data will be updated either on foot of information given by persons whose data we retain or, where relevant, information useful to providing good pastoral care or enabling proper communication within our organisation.

7. Data Retention Policy

To ensure fair processing, personal data will not be retained by the parish for longer than necessary in relation to the purposes for which it was originally collected, or for which it was further processed. The length of time for which the parish needs to retain personal data is set out below:

Overview

The need to retain data varies widely with the type of data. Some data can be immediately deleted and some must be retained until reasonable potential for future need no longer exists. Since this can be somewhat subjective, a retention policy is important to ensure that the parish's guidelines on retention are consistently applied throughout the Douglas Union with Frankfield.

Purpose

The purpose of this policy is to specify the parish's guidelines for retaining different types of data.

Scope

The scope of this policy covers all parish data stored on parish-owned or provided systems and media, regardless of location. Note that the need to retain certain information can be mandated by local, industry regulations and will comply with EU General Data Protection Regulation GDPR and the Data Protection Act 1988 and the Data Protection (Amendment) Act 2003. Where this policy differs from applicable regulations, the policy specified in the regulations will apply.

Policy

(i) Reasons for Data Retention

Douglas Union with Frankfield does not wish to simply adopt a "save everything" approach. That is not practical or cost effective and would place an excessive burden on clergy, staff and volunteers to manage the constantly-growing amount of data. Some data, however, must be retained in order to protect the parish's interests, preserve evidence, and generally conform to good operational practices. Some reasons for data retention include:

- Litigation
- Accident investigation
- Security incident investigation
- Regulatory requirements

(ii) Data Duplication

As data storage increases in size and decreases in cost, data is often stored in several places on the network. A common example of this is where a single file may be stored on a local user's machine, on a central file server, and again on a backup system. When identifying and classifying the data, it is important to understand where that data may be stored, particularly for duplicate copies, so that this policy may be applied to all duplicates of the information.

(iii) Retention Requirements

This section sets guidelines for retaining different types of parish data.

Staff Records: General employee data will be held for the duration of employment and then for 6 years after the last day of contractual employment. Employee contracts will be held for 6 years after last day of contractual employment. Tax payments will be held for six years.

Staff Rotas/Rosters: Data will be held for 1 year.

Parishioner /Household Records: Personal data will be held for as long as the individual is a member of the parish plus 1 year.

Church attendance records for the purposes of contact tracing during the COVID-19 pandemic.

Christian Stewardship Records: Personal data will be held for as long as the individual is a member of the parish and will be retained for 7 years after that, or for whatever period is required by the Revenue Commissioners.

Choir Records: Personal data will be held for as long as the individual is a member of the choir/parish plus 1 year.

Safeguarding Trust (Child Protection) Records: Personal data will be held for as long as the individual is a member of the parish plus 1 year unless a longer retention period is required by law or *Safeguarding Trust*.

Recruitment Details: Interview notes of unsuccessful applicants will be held for 1 year after interview. This personal data will then be destroyed.

Select Vestry Records: Personal data will be held for as long as the individual is a member of the parish plus 1 year.

Parish Registers (Baptism, Confirmation, Marriage, Register of Vestry Members): Data will be held indefinitely as an historical record and data will only be deleted on receipt of an appropriate request to do so and subject to regulations relevant to such records as determined by the Constitution of the Church of Ireland and such directives as may be issued by the Representative Church Body and/or the General Synod and Standing Committee of the Church of Ireland.

(iv) Retention of Encrypted Data

If any information retained under this policy is stored in an encrypted format, considerations must be taken for secure storage of the encryption keys. Encryption keys must be retained as long as the data that the keys decrypt is retained.

(v) Data Destruction

Data destruction is a critical component of a data retention policy. Data destruction ensures that the Parish will use data efficiently thereby making data management and data retrieval more cost effective. When the retention timeframe expires, the Parish must actively destroy the data covered by this policy. Data will be deleted from computer records and/or removed from files as appropriate. Paper records containing deleted personal records will also be shredded on site.

If a staff member feels that certain data should not be destroyed, he or she should identify the data to the Rector so that an exception to the policy can be considered. Since this decision has long-term legal implications, exceptions will be approved only by the Select Vestry.

The Parish specifically directs users not to destroy data in violation of this policy. Destroying data that a user may feel is harmful to himself or herself is particularly forbidden, or destroying data in an attempt to cover up a violation of law or parish policy.

(vi) Applicability of Other Policies

This document is part of the parish's cohesive set of policies. Other policies may apply to the topics covered in this document and as such the applicable policies should be reviewed as needed.

8. Consent

It is within the Parish's legitimate interest to retain, amend or delete personal data records gathered before 25th May 2018 but only in accordance the rest of this policy. From that date onwards, written consent for use of personal data will be sought using the consent forms in Appendix 1 of this document for all new members/participants in the parish's activities. Specially tailored consent forms for activities not covered by either form in Appendix 1 will be provided if needed.

9. Data Security

All our computer systems are password protected. Computer files containing personal data are password protected. Our computer systems are protected from hacking by up to date security software.

Paper records containing personal data are kept in locked and fire-proof filing cabinets and safes.

If a Data Breach takes place the reasons for the breach will be investigated by the Rector. Once the reason has been determined, such a breach will be reported to the Select Vestry and appropriate changes to the Parish's data protection policy and/or data systems will be implemented.

10. Privacy Notice

A Data Privacy Notice is to be available on the parish website and from the Parish Office at all times. It should be reviewed annually. The Parish's Privacy Notice is published in Appendix 3 of this policy.

8. Responsibility

Overall responsibility for ensuring compliance with Data Protection Acts and the GDPR rests with the Select Vestry. All employees and volunteers who separately collect, control or process the content and use of personal data are individually responsible for compliance with the Data Protection Acts and the GDPR. The Data Protection Co-Ordinator co-ordinates the provision of support, assistance, advice, and training within the parish to ensure that the organisation is in a position to comply with the legislation.

9. Review

This Data Protection Policy will be reviewed annually and amended in light of any legislative or perceived possible improvements according to experience and good practice.

APPENDIX 1

Access Request Policy

1. Introduction

At Douglas Union with Frankfield your privacy and data protection rights are very important to us. 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 Data Protection Acts 1988 and 2003 (the "Data Protection Acts") and the GDPR 2018 lay down strict rules about the way in which personal data and sensitive personal data are collected, accessed, used and disclosed. The Data Protection Acts and the GDPR also permit individuals to access their personal data on request, and confer on individuals the right to have their personal data amended if found to be incorrect and to have their personal data forgotten or deleted.

Inquiries about this access request policy should be made to: Data Protection Co-Ordinator, The Rectory, Carrigaline Road, Douglas, Cork.

2. Access Request Policy and Procedures

Purpose of This Policy

This document outlines the Parish's Access Request Policy to help ensure that we comply with requests made under the provisions of the Data Protection Acts and the GDPR.

Procedures

Individuals may make a request from the parish as follows:

Right to establish existence of personal data (section 3 Data Protection Acts).

Under section 3 of the Data Protection Acts and under the GDPR an individual may write to us asking whether we keep any personal data on him or her. Where we hold such personal data on you, we shall respond within 21 days of receipt of the request, giving you a description of the data we hold on you and the purposes for which it is kept.

You do not have to pay a fee for making a request of this type under section 3 of the Data Protection Acts. Please make your request in writing to us at: Data Protection Co-ordinator, The Rectory, Carrigaline Road, Douglas, Cork, stating that you are making your request under section 3 of the Data Protection Acts. Please note that before we respond to your request we may require that you provide us with satisfactory evidence of your identity and address.

We do not accept section 3 requests via telephone, email or text message.

Making an Access Request (section 4 of the Data Protection Acts).

Under section 4 of the Data Protection Acts, you may receive a copy of your personal data held by the Cathedral upon written request.

In order to respond to your section 4 request we ask you to:

1. Request from us the Access Request Form by telephone or email.
2. Please complete, sign and date the form and be specific as possible about the information you wish to access.
3. Attach a photocopy of your proof of identity and address to the Access Request Form.
4. Post the Access Request Form to: Data Protection Co-Ordinator, The Rectory, Carrigaline Road, Douglas, Cork.

Use of the Access Request Form is not mandatory. Completing the Access Request Form should enable us to process your section 4 request more efficiently. However, please note that we may not provide you with the data requested if you do not meet the requirements at points 3. - 4. above.

Please note that we reserve the right not to process and release data requested where you have not complied with the requirements of section 4 of the Data Protection Acts including where:

- Your request is not made in writing. We do not accept completed Access Request Forms and other required documentation via telephone, email or text message.

Responding to your Access Request under section 4

Once we have received your fully completed Access Request Form and your proof of identity and address, we shall respond to you within one month.

If you are not satisfied with the outcome of your access request you are entitled to make a complaint to the Data Protection Commissioner who may investigate the matter for you.

Responsibility

Overall responsibility for ensuring compliance with the requests made under the Data Protection Acts rests with Data Ireland.

All volunteers of the parish who separately collect, control or process the content and use of personal data are individually responsible for compliance with the Data Protection Acts. The Data Protection Co-Ordinator is the parish's Data Protection Officer, and co-ordinates the provision of support, assistance, advice, and training throughout the organisation to ensure we are in a position to comply with the legislation.

Review

This Access Request Policy will be reviewed regularly in light of any legislative or other relevant developments.

DOUGLAS UNION WITH FRANKFIELD

Data Access Request Form

Request for a copy of Personal Data under section 4 of Data Protection Acts 1998 and 2003 Data Protection Act 1988 and Data Protection (Amendment) Act 2003.

Important: A photocopy of your proof of identity (e.g. passport or driver's licence) and a photocopy of proof of address (e.g. utility bill) must accompany this Access Request Form (see Note below).

Section 1 - please complete this section

Full Name _____

Postal Address _____

Telephone/Email* _____

**we may need to contact you to discuss your Access Request*

Section B - please complete this section

I, _____ [insert name] wish to have access, in accordance with section 4, to the following information held about me by Douglas Union with Frankfield:

Signed _____ Date _____

Checklist:

- Have you: 1. completed, signed and dated the Access Request Form? _____
2. attached a photocopy of proof of your identity and address? _____

If you have answered No to any question above (except question 1.) we regret that we may not provide you with the data requested. The use of this form is not mandatory. However completing this form should enable us to process your request more efficiently.

Please return this form to:

Data Protection Co-Ordinator, The Rectory, Carrigaline Road, Douglas, Cork

NOTE: we require proof of the applicant's identity and address to ensure that the person making this access request is acting legitimately

DOUGLAS UNION WITH FRANKFIELD

APPENDIX 2 - CONSENT FORMS

1. Consent Form - General Your privacy is important to us, and we want to communicate with church members in a way which has their consent, and which is in line with European Law on Data Protection. As a result of a change in Data Protection regulation, we now need your consent as to how we contact you. Please fill in the contact details you want us to use to communicate with you. All those who are 18 years of age or older should fill in their names and details below. In the case of those under 18, only their names and dates of birth should be listed. We assume they share the same address as the adults unless otherwise stated.

Name	
Address	
Email Address	
Phone Number	

Name	
Address	
Email Address	
Phone Number	

Name	
Address	
Email Address	
Phone Number	

Name	
Address	
Email Address	
Phone Number	

Name	
Address	
Email Address	
Phone Number	

For family members who are under 18, please list their names and dates of birth below:

Name	Date of Birth

By signing this form you are confirming that you are consenting to Douglas Union with Frankfield holding and processing your personal data for the following purposes (please tick the boxes where you grant consent):-

I consent to the church contacting me by post phone or email.

To keep me informed about news, events, activities and services in Douglas Union with Frankfield (*note you can unsubscribe from such notifications at any time*);

To add my name and contact details to the list of parishioners so that the clergy know where and how to contact me or to arrange a home visit.

To share my contact details with the Diocese of Cork, Cloyne and Ross so they can keep me informed about news, events, activities and services that will be occurring in the diocese and which are directly relevant to any role I may be undertaking;

Signed: _____ Dated: _____

Signed: _____ Dated: _____

You can grant consent to all the purposes; one of the purposes or none of the purposes. Where you do not grant consent we will not be able to use your personal data; (so for example we may not be able to let you know about forthcoming services and events); except in certain limited situations, such as where required to do so by law or to protect members of the public from serious harm. You can find out more about how we use your data from our “Data Privacy Notice” which is available from our website or from the Parish Office.

You can withdraw or change your consent at any time by contacting the Ven. Adrian Wilkinson, The Rectory, Carrigaline Road, Douglas, Cork; Tel: 4891539; Email: adrianwilkinson3@gmail.com or archdeacon@cork.anglican.org.

Please note that all processing of your personal data will cease once you have withdrawn consent, other than where this is required by law, but this will not affect any personal data that has already been processed prior to this point.

Douglas Union and Holy Trinity Church Frankfield are Registered Charities.

APPENDIX 3 - DATA PRIVACY NOTICE

1. Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (the "GDPR").

2. Who are we?

Douglas Union with Frankfield is the data controller (contact details below). This means it decides how your personal data is processed and for what purposes.

3. How do we process your personal data?

Douglas Union with Frankfield complies with its obligations under the "GDPR" by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We use your personal data for the following purposes: -

To enable us to provide a voluntary service for the benefit of the public in a particular geographical area as specified the Diocese of Cork and the Constitution of the Church of Ireland;

- To administer membership records;
- To fundraise and promote the interests of the church;
- To manage our employees and volunteers;
- To maintain our own accounts and records;
- To comply with Safeguarding Trust (Child Protection) requirements;
- To administer and run effectively our fundraising activities;
- To inform you of news, events, activities and services running in Douglas Union with Frankfield;
- To share your contact details with the Diocesan Office so they can keep you informed about news in the diocese and events, activities and services that will be occurring in the diocese and in which you may be interested.
- To comply with requirements as set down by the Diocesan Council or the Representative Church Body.

4. What is the legal basis for processing your personal data?

- Explicit consent of the data subject so that we can keep you informed about news, events, activities and services and process your donations and keep you informed about parish and diocesan events
- Processing is necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement
- Processing is carried out by a not-for-profit body with a political, philosophical, religious or trade union aim provided:

- the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes); and
- there is no disclosure to a third party without consent

5. Sharing your personal data

Your personal data will be treated as strictly confidential and will only be shared with other members of the church in order to carry out a service to other church members or for purposes connected with the church. We will only share your data with third parties outside of the parish with your consent.

6. How long do we keep your personal data?

We keep data in accordance with the guidance set out within Irish Data Protection Legislation.

Specifically, we retain parish membership data, parish activities/organisations membership data and personal data relating to our governance structures and systems while it is still current; records of donations and tax rebates on donations over €250 p.a. and associated paperwork for up to 6 years after the calendar year to which they relate; and parish registers (baptisms, confirmations, marriages, burials) permanently.

7. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data: -

- The right to request a copy of your personal data which Douglas Union with Frankfield holds about you
- The right to request that Douglas Union with Frankfield corrects any personal data if it is found to be inaccurate or out of date
- The right to request your personal data is erased where it is no longer necessary for Douglas Union with Frankfield to retain such data
- The right to withdraw your consent to the processing at any time
- The right to request that the data controller provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable)
- [*Only applies* where the processing is based on consent or is necessary for the performance of a contract with the data subject and in either case the data controller processes the data by automated means }
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing
- The right to object to the processing of personal data, (where applicable) [*Only applies* where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics]
- The right to lodge a complaint with the Data Protection Commissioner

8. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice. The new notice will explain the *new use* of your personal data prior to commencing the processing. It will set out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

9. Contact Details

To exercise all relevant rights, queries or complaints please in the first instance contact the Data Protection Coordinator, The Rectory, Carrigaline Road, Douglas, Cork. Tel: +353 (0)21 4891539; Email: adrianwilkinson3@gmail.com or archdeacon@cork.anglican.org

You can contact the Data Protection Commissioner on +353 (0761) 104 800; via email info@dataprotection.ie or by writing to: The Data Protection Commissioner, Canal House, Station Road, Portarlinton, Co. Laois, R32 AP23