



## PRIVACY NOTICE FOR THE DIOCESE OF DOWN AND CONNOR

### 1. Introduction

The Diocese of Down and Connor, which we refer to in this Notice as “the Diocese”, “we” and “us”, is a charity registered with the Charity Commission in Northern Ireland. Our charity number is 103983 and our registered address is 73 Somerton Road, Belfast, BT15 4DE.

For the purpose of the Data Protection Act 2018, the Diocese is a Controller in respect of your Personal Data. Please be aware that our parishes form part of the Diocese and are not separate legal entities. Parishes are not Controllers. All clergy, staff and volunteers of the Diocese who are involved in the Processing (which includes collecting, accessing, using and/or disclosing) of Personal Data held by the Diocese are Data Processors and have a duty to protect the data they process by complying with this policy

When you provide us with Personal Data in order to engage with us and/or benefit from our activities, we will keep a record of the data you give to us in order to enable us to comply with our statutory obligations and to achieve our charitable objects of advancing the Roman Catholic religion through the operation of our parishes and our other activities.

Everyone has rights with regard to how his or her Personal Data is handled by organisations. The Diocese is committed to ensuring that Personal Data is properly and securely managed in accordance with the relevant data protection laws, and believes this is an important part of achieving trust and confidence between the Diocese and those with whom it interacts. This Notice is to let you know how the Diocese will look after your personal data. When we ask you for personal data we will ensure that:

- You know why we need it;
- We only ask for what we need and don't collect too much or irrelevant information;
- We protect your information and make sure nobody has access to it who shouldn't have;
- We only share it with other organisations when it is lawful to do so; and
- We don't keep it longer than is necessary.

Please read this Notice to understand how we use and protect the information that you provide to us or that we obtain or hold about you, and to understand what your rights are in relation to information that we hold. This Notice applies to information about living identifiable individuals only.

If you are required to make any contact with the Diocesan Safeguarding Office, you will receive some additional information directly from it that sets out the ways it will use and process your data.

### 2. What Personal Data do we hold about you?

Personal data is another way of describing your personal information. It includes any information which relates to a living individual who can be identified from that information. Identification can be by the information alone or in conjunction with any other information in our possession or likely to come into our possession. The processing of personal data is governed by the Data Protection Act 2018. We process the following types of your personal data:

- name and contact details;
- gender, age, date of birth, marital status and nationality;
- information about your education/work history and professional qualifications;
- information about your family and any dependants;
- information about your current involvement in Diocese activities and events;
- financial information (e.g. bank details) and details of any donations you have made to us in the past;
- information obtained as a result of any background checks on volunteers;
- CCTV recordings and photographs;
- information we collect through your use of our website(s) such as IP addresses and other information collected using cookies];
- any other information which you choose to provide to us or that we are provided by others.

We may also collect, store and use the following types of Special Category of Personal Data:

- Information about your race or ethnicity, religious beliefs;
- Information about your sexual orientation may be processed by our Safeguarding Office due to the nature of its functions;
- Information about your health and wellbeing (for example, any physical or mental health conditions that you or a family member may have (if applicable)); and
- Information about criminal convictions and offences (if applicable).

We obtain this information from you, your relatives, other parishioners, other dioceses, schools, groups you are involved in, your employers, HMRC, charities (for example, Saint Vincent de Paul), medical professionals CCTV and web cameras, the police, social services and other law enforcement bodies.

### **3. How do we process your personal data?**

The Diocese 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 personal information; by protecting personal information from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate organisational and technical measures are in place to protect your personal information.

We use your personal data for the following purposes (whether it is collected directly from you or whether we receive it from a third party): -

- to carry out our activities, from baptisms, weddings and funerals to general pastoral and spiritual care. This includes processing your Personal Data to organise readers at Mass, Extraordinary Ministers of Holy Communion, parish committees, pastoral councils, children's liturgy, and mailing lists for courses. This also includes the voluntary service we provide for the benefit of the public, for example, providing Holy Communion to those who are sick and/or housebound and sending invitations to a bereavement mass etc.;
- to communicate with you in relation to news about or activities and events taking place in the Diocese or in any Diocesan parish, including seeking feedback and informing you of any changes to our activities;
- to improve our activities and the way we communicate with you including our website or the website of any parish.;
- to process donations that you may make to us or other payments where, for example, you hire facilities belonging to the Diocese;
- to administer, support, improve and develop the administration of the Diocese's work and operations and to keep the Diocese's or any parish's accounts and records up-to-date;

- to process applications from you, including grant applications and applications for a role within the Diocese;
- to identify potential additional sources of fundraising, such as identifying those eligible to make Gift Aid nominations and other forms of wealth screening, and administering Parish draws;
- for audit and statistical purposes (e.g. for the annual audit undertaken by the Irish Catholic Bishops' Conference);
- to ensure we comply with our legal obligations (e.g. by providing information to the Charity Commission of Northern Ireland or HMRC or carrying out safeguarding activities and the reporting of serious incidents);
- in the case of webcams, to stream Mass to allow those who are unable to attend the ability to watch the service;
- in the case of CCTV recordings, to prevent or detect crime, and to help create a safer environment for our staff, parishioners and visitors; and
- any information gathered through cookies and similar technologies via the Diocesan website or the website of any parish, is used to measure and analyse information on visits to the website, to tailor the website to make it better for visitors and to improve technical performance. We will not use the data to identify you personally or to make any decisions about you.

#### 4. On what Grounds do we Process your Personal Data?

We will only use your personal information when we have a lawful reason to do so. This might be because:

- The processing is carried out for the **legitimate interest** in advancing the Roman Catholic religion within the Diocese, including providing information about the activities of the Diocese or any Diocesan parish, administering the sacraments and to raise charitable funds, and:
  - the processing relates only to members or former members (or those who have regular contact with it in connection with this purpose); and
  - there is no disclosure to a third party without consent.

*For example our use baptism data to follow up for families for first communion.*

- You have provided your **consent** (which can be withdrawn at any time by contacting the Diocesan Office) to process your information so that we can keep you informed about news, events, activities and services and keep you informed about parish and diocesan events;

*For example you may consent to us sending fundraising communications to you by email or SMS.*

- We have a **legal obligation** to process the information.

*For example sending your gift aid information to HMRC, or if we send information to a social services for safeguarding purposes;*

- The processing is necessary for carrying out obligations in relation to a **contract** to which you are party or prior to you entering into a contract.

*For example where you enter into a hire agreement for the use one of our facilities;*

- The processing is necessary for carrying out a task in the **public interest**.

*For example where we update and maintain the register of marriages;*

- The processing is necessary to protect your **vital interests**.

*For example if you were unfortunate enough to fall ill or suffer an injury on our premises, then we may pass on information to the NHS for treatment purposes and to family members.*

If we process any Special Categories of Personal Data we must have a further lawful basis for the processing. This may include:

- Where you have given us your explicit consent to do so  
*For example, you have consented to us processing your health information to cater for your medical or dietary needs at an event;*
- Where the processing is necessary to protect your vital interests or someone else's vital interests.  
*For example, passing on information to the Police;*
- Where the processing is carried out in the course of our legitimate interests as a Roman Catholic Diocese working with and supporting our current and former parishioners and the information is not shared outside the Diocese other than with your consent.  
*For example, carrying out parish censuses;*
- Where you have made the information public.  
*For example, reports in the media which have had your consent.*
- where the processing is necessary for the establishment, exercise or defence of legal claims;
- Where the processing is necessary for carrying out the Diocese's employment and social security obligations; or
- the processing being necessary for reasons of substantial public interest.  
*For example, where steps are taken to prevent fraud or other dishonest activity;*

Provided that the legal basis is proportionate to the aim pursued and provides for suitable and specific measures to safeguard your rights, or as part of our legitimate interests as a Roman Catholic Diocese and charitable institution.

## **5. With whom will we share your information?**

Your personal information will be treated as strictly confidential and will be used only for the purpose for which it was obtained, unless you have explicitly and unambiguously agreed that we might share your Personal Data with another organisation or unless we are otherwise permitted or required to under data protection rules or order of a Court or other competent tribunal or regulatory body as set out in this notice.

- We may share your information with any ecclesiastical body enjoying canonical jurisdiction or powers of governance as detailed in the Code of Canon law or in the Apostolic Constitution *Pastor Bonus*;
- We may share your information internally within the Diocese to those individuals who need to know the information.  
*For example we may need to disclose your personal information to the Diocesan Safeguarding Office if you are involved in a safeguarding matter.*
- We may share your information with other parishes outside the Diocese and which may be in certain circumstances with Dioceses outside the EEA.  
*For example, if you are getting married in another parish or diocese outside the EEA.*
- Sometimes the Diocese contracts with third parties whom we ask to process Personal Data on our behalf  
*For example with payroll providers, IT consultants, distributors of parish newsletters and directories. We require these third parties to comply strictly with our instructions and with data protection laws;*
- We may share your information (or that of your dependents) with schools. *For example, for the purpose of preparing children for First Confession, First Holy Communion or Confirmation;*
- We may share your information with government bodies for tax purposes or law enforcement agencies for the prevention and detection of crime.
- We also may be required to share your Personal Data so that the Diocese can benefit from Gift Aid nominations you have made. (e.g. with HMRC)
- We may share your information with volunteer groups and parish committee members if you are a member, or with bereavement groups if you have consented for us to do so;

- We may post photos or videos to our social media pages (however, we will ask for your permission to do this);
- We may live stream or provide a digital recording of a service online that is taking place in the Church (for example, Sunday Mass), in order to allow those who are unable to attend due to age, distance or disability, the ability to watch the service. In the event of a Mass being streamed, we will either create “no video” zones to enable you to sit in an area of the Church that will avoid the scope of the lens, or alter the lens so that it is only focused on the priest taking the service. Signage will be placed in the relevant Churches to help you determine how to avoid your image being captured on the web camera or digital recording but still be able to participate in prayer. We will ask parents or guardians of altar servers for their consent for their child or their children to be featured on a live stream or digital recording of the service.
- We may share information with your employer or prospective employer if they have asked for a reference;
- We may share information with our professional advisors (for example, accountants and solicitors); or
- if we are otherwise required to share your information under the data protection laws, or order of a Court or other competent regulatory body or as set out in this Notice.

## **6. Transfer of your Personal Data outside the European Economic Area**

In the course of processing your Personal Data, or disclosing it to the recipients referred to above, we may transfer it to countries which are outside the European Economic Area (EEA), some of which may not have laws which provide the same level of protection to your Personal Data as laws inside the EEA. In such cases we will take steps to ensure that the transfers comply with the Data Protection Act 2018 and that your Personal Data is appropriately protected. We do so by taking the following measures:

- putting in place a contract with the recipient that means they must protect the personal information to the same standards as is required in the EEA;
- transferring it to a non-EEA country with privacy laws that give the same protection as the EEA;
- transferring it to organisations that are part of Privacy Shield (or any successor or replacement scheme). This is a framework that sets privacy standards for data sent between the US and EU countries to ensure that those standards are similar to what are used within the EEA.;
- transferring it to organisations or countries that have other approved certification schemes or codes in place; or
- relying on another appropriate ground under applicable data protection laws.

## **7. How long do we keep your personal data?**

We keep personal information in accordance our Data Retention Policy. We keep certain types of information for different periods of time. Specifically, we retain gift aid declarations and associated paperwork for up to 7 years after the calendar year to which they relate; and we retain sacrament registers (i.e. baptismal records, communion records, marriage records etc.) permanently.

## **8. What rights do you have concerning your personal data?**

You have the following rights with respect to your personal data: -

- The right to be informed that your information is being processed and to request a copy of the information we hold about you;
- The right to request that the your personal information is rectified if it is out of date or inaccurate;
- The right, where there is a dispute in relation to the accuracy or processing of your personal information, to request a restriction is placed on further processing;
- The right to request your personal data is erased where there is no compelling reason for us to continue to process the information;
- If we are relying on your consent to process Personal Data, the right to withdraw your consent to the processing at any time;
- The right, where there is a dispute in relation to the accuracy or processing of your personal information, to request a restriction is placed on further processing; and
- The right to object to the processing of personal data (for example, in relation to our processing of your information for direct marketing (i.e. fundraising) purposes)

Please note that these rights may be limited in certain situations, for example, we cannot erase any sacramental records. We may however be able in certain circumstances to append a note to such records.

Rights may only be exercised by the individual whose information is being held by the Diocese or with that individual's express permission. Children from twelve years upwards are entitled to make their own requests where the Diocese reasonably believes that they have an appropriate understanding of the request that they are making. Parents (guardians/family members) do not have an automatic right to see information about their child or prevent their child from making a request to the Diocese.

We may also require proof of your identity for verification purposes before you can exercise any of these rights

### **9. What we ask of you about the personal data that you provide?**

We ask that you ensure that any personal information you provide us with is as accurate and as complete as possible. Please don't include personal information about another person (including family members) unless you have told the person and they agree to it being provided. We also ask you to tell us as soon as possible if any of the personal information you have provided changes, for example if you change your address.

### **10. What is our Website Policy?**

The policy includes the websites hosted under the [downandconnor.org](http://downandconnor.org) domain only. Within the Diocese domain you may find websites over which the Diocese does not maintain editorial responsibility or direct control. Such sites can include the websites of other Catholic groups, bishops, Holy See etc. While the Diocese encourages compliance with this web privacy statement at such sites, please consult the privacy statements of individual sites, or contact the persons responsible for those sites, in order to understand the policies and practices under which they operate. This also includes links to Facebook and Twitter. By visiting [www.downandconnor.org](http://www.downandconnor.org) you are accepting and consenting to the practices described in this statement.

When someone visits [www.downandconnor.org](http://www.downandconnor.org) we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it. The Diocese does not use automatic decision making software and does not engage in profiling.

It is the policy of the Diocese not to disclose technical details in connection with visits to this website in respect of individual website visitors to any third party unless obliged to disclose such information by a rule of law. The technical information will be used only for statistical purposes. You should note that technical details, which the Diocese cannot associate with any identifiable individual, do not constitute "personal data" for the purposes of the Data Protection Act 2018 and GDPR 2018.

#### **Cookies**

Cookies, also known as browsers or tracking cookies, are small text files that are added to your computer when you visit a website. They help websites to perform certain functions e.g. to know who you are if you log into a restricted part of a website, for shopping carts, and for tracking purposes.

The Diocese uses the following cookies:

- **Google Analytics.** We use Google Analytics cookies on the website for tracking purposes. The cookies allow us to understand general traffic to our website for example number of visitors and length of time on site. This process does collect data, but in an anonymous form, to help us make improvements, develop the website and enhance the user experience.
- **Privacy preferences.** We use a tracking cookie, which is added to your computer, to remember your cookie preferences i.e. if you have allowed or disallowed them.

- **Register for events.** We have the ability for you to register for events on the website. If you do so this information goes directly into our database. In order to register our database adds an essential cookie (reaction server) to your computer.

#### Manage Cookies

- If you would like to opt-in or opt-out of using cookies then you should be able to do so using your browser. You can review your cookie settings at any time.
- Please note that you cannot opt-out of the deployment of cookies that are necessary for delivery of our website or services to visitors.

#### E-Newsletters

- At the Diocese of Down and Connor we take our data handling responsibility seriously. We may issue e-newsletters from time to time for the purpose of keeping you informed in the way you might request. In that event your contact details will be used solely for that purpose and we will never share your information with a third party. To be removed from our mailing list contact [dataprotection@downandconnor.org](mailto:dataprotection@downandconnor.org) or use the unsubscribe option which we will insert in the footer of all our newsletters.

The Diocese is committed to ensuring your information is secure. In order to prevent unauthorised access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure your information. The Diocese uses technical and organisational security measures to protect your data from accidental or intentional manipulation, loss, destruction or access by unauthorised persons. Our security measures are continuously adapted in line with technological developments.

We seek to ensure that we keep your personal data accurate and up to date. However, you are responsible for informing us of any changes to your personal data and other information.

No personally identifiable information is collected on this website from visitors, staff, clergy and volunteers that browse the website for information on our activities. We review these measures regularly.

Unfortunately the transmission of information via the internet is not completely secure. Although we do our best to protect your personal data, any transmission via our website is ultimately at your own risk. Once we have received your information we will use strict procedures and security features to try and prevent unauthorised access to, or unlawful processing or disclosure of, such data.

### **11. How can you complain?**

If you are unhappy with any aspect of how your personal information is being processed, please contact the Diocesan Data Protection Officer: Telephone: +44 (0) 28 9077 6185; Email: [dataprotection@downandconnor.org](mailto:dataprotection@downandconnor.org)

You can contact the Information Commissioners Office (UK) on 0303 123 1113; via email <https://ico.org.uk/global/contact-us/email/> or by writing to the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

### **12. How do we secure your personal data?**

Once we have received your information, we will use appropriate procedures and security to mitigate against unauthorised loss and to protect your personal data from unlawful processing, accidental loss, destruction and damage.

### **13. How do we make changes to this Privacy Notice?**

We may make changes to this Notice from time to time as our practices and laws evolve. We will not make any use of your data that is inconsistent with the original purposes for which it was obtained (if we intend to do so we will notify you in advance when possible) or otherwise that is permitted by the data protection laws.

31<sup>st</sup> May 2018