

Data Protection Policy of Kilmocomogue Union of Parishes

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?

The Parish of Kilmocomogue Union is the data controller. This means it decides how your personal data is processed and for what purposes.

3. How do we process your personal data?

The Parish of Kilmocomogue Union 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.

Kilmocomogue Union of Parishes uses personal data about living individuals for the purpose of general church administration and communication.

Kilmocomogue Union of Parishes recognises the importance of the correct and lawful treatment of personal data. All personal data, whether it is held on paper, on computer or other media, will be subject to the appropriate legal safeguards as specified in the General Data Protection Regulation 2017

Kilmocomogue Union of Parishes fully endorses and adheres to the eight principles of the GDPR. These principles specify the legal conditions that must be satisfied in relation to obtaining, handling, processing, transportation and storage of personal data. Employees and any others who obtain, handle, process, transport and store personal data for Kilmocomogue Union of Parishes must adhere to these principles.

4. The 8 Principles

The principles require that personal data shall:

1. Be processed fairly and lawfully and shall not be processed unless certain conditions are met.
2. Be obtained for a specified and lawful purpose and shall not be processed in any manner incompatible with that purpose.
3. Be adequate, relevant and not excessive for those purposes.
4. Be accurate and, where necessary, kept up to date.
5. Not be kept for longer than is necessary for that purpose.
6. Be processed in accordance with the data subject's rights.
7. Be kept secure from unauthorised or unlawful processing and protected against accidental loss, destruction or damage by using the appropriate technical and organisational measures.
8. Not be transferred to a country or territory outside the European Economic Area, unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

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

- **Explicit consent of the data subject** so that we can keep you informed about parish news, events, activities and services and process your Fair Share donations. ✓
- Processing is necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement **n/a**
- 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) ✓
- There is no disclosure to a third party without consent ✓

6. 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.

7. 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 list data while it is still current; Fair Share declarations and associated paperwork for up to 6 years after the calendar year to which they relate; and parish registers (baptisms, marriages, funerals) permanently.

8. 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 Kilmocomogue Union of Parishes holds about you
- The right to request that Kilmocomogue Union of Parishes 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 Kilmocomogue Union of Parishes to retain such 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 data, to request a restriction is placed on further processing
- 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 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 (Ireland)

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9. 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.

10. Maintaining Confidentiality

Kilmocomogue Union of Parishes will treat all your personal information as private and confidential and will not disclose any data about you to anyone other than those engaged in the administration and day-to-day ministry of the parish.

There are four exceptional circumstances to the above permitted by law:

- a. Where we are legally compelled to do so.
- b. Where there is a duty to the public to disclose.
- c. Where disclosure is required to protect your interest.
- d. Where disclosure is made at your request or with your consent.

11. Use of Personal Information

Kilmocomogue Union of Parishes will use your personal data for the following purposes: -

- a. To enable us to provide a voluntary service for the benefit of (the parishioners of Kilmocomogue Union of Parishes) as in the public in a particular geographical area as specified in the Constitution of the Church of Ireland;
- b. To administer membership/ parochial records;
- c. To fundraise and promote the interests of the church;
- d. To maintain our own accounts and records (including the processing of Fair Share);
- e. To inform you of news, events, activities and services running at Kilmocomogue Union of Parishes

12. The Parish List and Fair Share Database

Information contained on the list of parishioners (Parish List) and the list of subscribers (Fair Share Database) will not be used for any other purposes than set out in this section. They are both held in a secure location.

13. Access to the Parish List and Fair Share Database is strictly controlled

- a. Those authorised to use the Parish List only have access to their specific area of use within the database. This is controlled by the Data Controller (The Rector). This is the only person who can access and set these security parameters.
- b. People who have secure and authorised access to the database are the Fair Share Recorder, who has access to the entire Parish List and Fair Share Database and the Data Controller (The Rector) who has access only to the Parish List.
- c. The database will NOT be accessed by any authorised users outside of the EU, in accordance with the Data Protection Act, unless prior consent has been obtained from the individual whose data is to be viewed.

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- d. Subject Access - all individuals who are the subject of personal data held by Kilmocomogue Union of Parishes are entitled to:
- i. Ask what information the church holds about them and why.
 - ii. Ask how to gain access to it.
 - iii. Be informed how to keep it up to date.
 - iv. Be informed what Kilmocomogue Union of Parishes is doing to comply with its obligations under the 1988 Data Protection Act.

14. Rights to Access Information

Parishioners and other subjects of personal data held by Kilmocomogue Union of Parishes have the right to access any personal data that is being held. This right is subject to certain exemptions: Personal Information may be withheld if the information relates to another individual.

Any person who wishes to exercise this right should make the request in writing to

Canon Paul Willoughby (Data Controller)
Kilmocomogue Union of Parishes
Durrus Rectory
Bantry
Co. Cork
P 75 A592
Tel: 027 61011 - Mob: 086 8233399 (no text messages)
Email: bantryrector@gmail.com
web: www.durrusfete.ie
Charity Number CHY 7240 - Tax Reference 9620233K

The Data Protection Commissioner (Ireland)
Canal House
Station Road
Portarlinton
Co. Laois
R32 AP23

+353 (0761) 104 800
info@dataprotection.ie

If personal details are inaccurate, they can be amended upon request.

Kilmocomogue Union of Parishes aims to comply with requests for access to personal information as quickly as possible, but will ensure that it is provided within 30 days of receipt of a completed form unless there is good reason for delay. In such cases, the reason for delay will be explained in writing to the individual making the request.

This Data Protection Policy was ratified by the Select Vestry of Kilmocomogue Union of Parishes at a meeting held on Tuesday, May 15th 2018

Signed:



Canon Paul Willoughby, Chairperson of the Select Vestry
and Data Controller for Kilmocomogue Union of Parishes