

# **Privacy Notice for Clergy**

## **Diocese of Cloyne**

### **Introduction**

The Diocese is committed to protecting the personal data of its clergy. This Privacy Notice sets out important information about how the Diocese collects and uses your personal data. This notice applies to all current and former Diocesan clergy, applicants for the priesthood in the Diocese and seminarians (where applicable) and also to visiting clergy.

The Bishop is the data controller of your personal data.

You should read this Notice carefully and raise any questions you may have with the Diocesan Secretary or Data Protection Officer.

### **How the Diocese gets your information**

We get information about you from the following sources:

- Directly from you
- From the Garda National Vetting Bureau
- From your vetting application
- From records created by virtue of any role you carry out
- From CCTV images/photographs and videos
- From the seminary you attend
- From referees
- From training records
- From correspondence relating to you

### **Why is your personal data processed?**

- So the Bishop can exercise his legal and pastoral responsibilities
- General oversight of your ministry
- Assessing your qualifications and suitability for any particular office or ministry within the Diocese
- Making appropriate arrangements for your ministerial development (including ministerial development review)
- To administer training and to assess training needs
- To deal with any issues that arise in the course of your ministry
- To ensure the security of our premises, equipment and IT systems
- To carry out our safeguarding obligations (see Safeguarding Privacy Notice)
- To ensure the security of our premises, equipment and IT systems

## What personal data does the Diocese process?

- Personal contact details such as your name, title, address, contact telephone numbers (landline and mobile) and personal email addresses
- Application forms and files from when you were a seminarian
- References
- Diocesan clergy files, including details of ordination, ministry status, current and previous parishes, committees served, current and previous appointments, training attended, previous residential addresses
- Information forms on applications for involvement in ministry in the Diocese
- Visa information where applicable
- Garda Vetting disclosure and associated paperwork, where applicable.
- Next of kin, emergency contacts and their contact information
- Photographs/CCTV images/video images
- Personal data which you otherwise voluntarily provide
- Health and wellbeing information either declared by you or obtained from referrals to or reports from occupational health, sick leave forms or medical certificates
- Correspondence from parishioners/volunteers or other individuals regarding your ministry
- Health and Safety records including, accident records if you have an accident while carrying out Diocesan or parish duties
- Phone data, where you have Diocesan phone
- Training records
- Documents relating to administrative matters in the Diocese or in the parishes where you serve

## Legal basis for processing your data

Depending on the processing activity, we rely on the following lawful basis for processing your personal data under the GDPR:

- Article 6(1)(b) which relates to processing necessary for the performance of a contract.
- Article 6(1)(c) to comply with legal obligations.
- Article 6(1)(d) in order to protect your vital interests or those of another person.
- Article 6 (1)(e) for the performance of a task carried out in the public interest.
- Article 6(1)(f) for the purposes of the Diocese's legitimate interest.

Where the information we process is special category data, for example, your health data, the additional bases for processing that we rely on are:

- Article 9(2)(c) to protect your vital interests or those of another person where you are incapable of giving your consent.
- Article 9 (2)(d) processing is carried out in the course of the Diocese's legitimate activities.
- Article 9(2)(f) for the establishment, exercise or defence of legal claims.

- Article 9(2)(g) processing is necessary for reasons of substantial public interest.
- Article 9(2)(h) for the purposes of preventative or occupational medicine.
- Article 9(2)(j) for archiving purposes in the public interest.

It is necessary for every member of clergy to be Garda vetting. This means that the Diocese may process personal data regarding criminal convictions. The lawful basis we rely to process this data are:

- Article 6(1)(b) for the performance of a contract.
- Article 6(1)(c) to comply with legal obligations.

## **Who does the Diocese share your data with?**

The Diocese will share your personal data with other parties only in limited circumstances and where this is necessary for the performance of a contract or to comply with a legal obligation, or otherwise in pursuit of its legitimate interests. We may share your information with the following:

- Garda National Vetting Bureau
- Occupational health practitioners
- Employment benefit providers
- Government departments, statutory agencies or regulatory bodies
- Professional advisors
- Other Dioceses
- Holy See

Where permitted by law, we reserve the right to release personal data without your consent and without consulting you, including where we believe this is appropriate to comply with our legal obligations.

We may share information with service providers but only when an appropriate service provider contract is in place.

## **Transfer of your personal data outside the European Economic Area (“EEA”)**

There may be circumstances where your personal data will need to be transferred to the Holy See. This is situate outside the EEA. The GDPR is not in force in the Holy See and, therefore, your personal data may not be subject to the same protections as apply when in Ireland.

## **How the Diocese stores your information**

We store your data in both manual and electronic format.

**Manual files** are kept in locked filing cabinets in Diocesan offices. There are no files in public areas and the offices are locked each evening.

**Electronic files** are stored using use Microsoft Office 365's cloud-based services.

Your data is retained for the periods set out in the Diocesan Retention Policy. Some personal data may be retained for significant periods for archival, historical or safeguarding reasons.

## Your data protection rights

You have a number of rights under the GDPR and the Acts. These include the following: -

- **Informed** – you have the right to be informed about any personal data that we hold relating to you, including information as to the accuracy of the data and the purpose for which it is used;
- **Access** – you have the right to be given a copy of all of your personal data on request;
- **Rectification** – you have the right to have any inaccurate data held by us rectified free of charge;
- **Restriction** – where there is a dispute in relation to the accuracy or processing of your personal data, you can ask for a restriction to be placed on further processing;
- **Withdraw** – where we rely on your consent to process your personal data, you can withdraw your consent;
- **Object** – you have the right to object to the processing of your personal data;
- **Erasure** – you have the right to request us to delete your personal data, this is known as the “right to be forgotten”;
- **Data portability** – you have the right to request us to provide you or a third party, with a copy of your personal data in a structured, commonly used machine-readable format.

The above rights are subject to certain exceptions and may be restricted in certain circumstances.

Rights may only be exercised by the individual whose information is being held by the Diocese or with that individual's express permission. We may request proof of identity for verification purposes before you can exercise any of these rights.

## Changes to Policy

The Diocese reserves the right to review and amend this Privacy Policy at any time.

## Contact

If you have any queries, please contact the Diocesan Secretary or the Data Protection Officer.