



# **CÉILÍ COMMUNITY**

**Data Protection**

**Policy Document**

**Reviewed 4 December 2018**

# Céilí Catholic Community Privacy Policy {GDPR}

Dated 18 May 2018.

On 25 May 2018, the General Data Protection Regulation (GDPR), a new Europe-wide data protection regulation comes into effect. This new regulation seeks to strengthen and unify data protection for all individuals within the European Union and grants new and enhanced rights for individuals in relation to their personal information.

People's privacy is vitally important to Céilí Catholic Community and we take our responsibility regarding the security of personal information very seriously.

## What does GDPR mean for you?

GDPR increases and reinforces the rights of individuals in relation to the information Céilí holds about them. Being transparent and providing accessible information to people about how we process their personal information is a key element of the new regulation.

Céilí Community takes privacy and the protection of its members, Cairde Céilí, volunteers, clergy, parishes, schools, employees, contractors, suppliers, and other third parties' data very seriously. As a Christian community, we have always attached the highest priority to the security of our people and information and will continue to do so going forward. We support the enhancements to data protection which GDPR will introduce and Céilí has been actively working to implement the changes required to be ready for this new regulation.

We are committed to protecting personal information and to being transparent about the information we have on people. During the course of our activities, Céilí Catholic Community (Céilí) will collect, store, use and otherwise process Personal Data (which may sometimes include Sensitive Personal Data) about the people with whom it interacts. This may include information about members of the public, Céilí Community, Cairde Céilí, volunteers, clergy, employees, contractors, suppliers and other third parties. This data is gathered in order to enable Céilí to comply with its statutory obligations and to achieve its charitable objectives of advancing and maintaining the Roman Catholic Faith through proclamation of the Good News of Jesus Christ and to equip others for this task of evangelisation

To reflect the newest changes in data protection law, and our commitment to transparency, we have put in place our Céilí Privacy Policy to ensure everyone has rights with regard to how their Personal Data is handled.

## Introduction

Céilí is committed to protecting privacy and takes its responsibility regarding the security of information very seriously. We will be clear and transparent about the information we are collecting and what we will do with that information.

This Policy sets out the following:

1. What personal data we collect; Where we obtain the data from;
2. What we do with that data;
3. Security of personal data;
4. Sharing personal data;
5. Cookies;
6. Data Protection Officer;
7. How Céilí deals with your data protection rights;
8. And how we comply with the data protection rules.
9. All personal data is collected and processed in accordance with Irish and EU data protection laws.

## **{1} What personal data we collect; Where we obtain the data from;**

Personal data means any information relating to you which allows us to identify you, such as your name, contact details, parish and payment details and information given us by our benefactors.

We may collect personal data from you when you book a mission, training session or conference with us (either directly or indirectly over our website), or when you contact us regarding information and/or queries.

Specifically, we may collect the following categories of information:

- a. Name, home address, e-mail address, telephone number, mobile number, {or payment details if you wish to become a benefactor};
- b. For those wishing to join and/or work with Céilí, we may require your name, nationality, date of birth, gender, passport or ID number, expiry date and country of issue, medical conditions and/or dietary requirements. For this category of person Céilí will also require the completion of a detailed application form and information from at least two referees.
- c. Parish or school details, history, including information related to missions booked in connection with Céilí work;
- d. The communications you exchange with us or direct to us via letters, emails, chat service, calls, and social media.

## **{2} What do we use your personal data for, why and for how long**

Your data may be used for the following purposes:

- a. Providing products and services you request: we use the information you give us to perform the services you have asked for in relation to our mission work;

- b. Contacting people regarding our work: we send communications twice yearly about Céilí and our services. These communications are not made for marketing purposes but merely to keep in contact with our database and especially our benefactors;
- c. Letters of acknowledgement of payment made by our benefactors: we use this payment information for accounting, tax relief purposes, audit purposes and to detect and / or prevent any fraudulent activities;
- d. Administrative purposes: Céilí can use data for statistical purposes, maintenance and development.
- e. For those, non Irish Nationals, wishing to join and/or work with Céilí we may be obliged to inform or communicate with the Gardai and/or Immigration/Customs control:
- f. Céilí may use data to manage its relationship with others and to improve our services and enhance people's experience with us;
- g. Provide tailored made mission work: Céilí may use information it receives to enhance and produce both a pastoral and professional approach to its work and ministry;
- h. Marketing: Céilí from time to time will contact parishes, schools and individuals with information regarding its work and ministry via telephone, mobile calls, brochure, letter or e-communications. People do have the choice to **opt out** of Céilí's communications by letting us know through email, text, letter or telephone.

We will only process personal data where we have a legitimate basis to do so.

We may also process personal data for one or more of the following:

- A. To comply with a legal obligation (e.g. Immigration or other legal reasons);
- B. To protect people's vital interests or those of another person (e.g. in case of a medical emergency);
- C. It is in our legitimate interests in operating as a missionary community (e.g. for administrative purposes).

Céilí will not retain data for longer than is necessary to fulfil the purpose it is being processed for.

Céilí must also consider periods for which it might need to retain data in order to meet its missionary and legal obligations.

When Céilí no longer needs your personal data, it will securely delete, shred or destroy it. Céilí may do so without further notice to you.

Personal details about people's physical or mental health, alleged convictions, and criminal offences are considered "sensitive" personal data. Céilí will only process such data if the person concerned has given his/her explicit consent to do so, except, when it may arise that this information needs to be shared because of an important and vitally grave reason in order to protect the person themselves, Céilí Community, its work and/or a third party.

### **{3} Security of personal data**

Céilí will follow strict security procedures in the storage and disclosure of personal data, and to protect it against accidental loss, destruction or damage.

It will take the following steps to secure personal information:

- A. Only those who are authorised will be able to access Personal Data and process it.
- B. Personal Data will only be stored on a central memory stick and not on individual PCs, portable electronic devices or removable storage media.
- C. Passwords will be kept confidential.
- D. Memory sticks and paper documents will be securely locked..
- E. Offices, desks and filing cabinets/cupboards will be kept locked if they hold Personal Data of any kind, whether on memory sticks or on paper.
- F. When destroying Personal Data, paper documents will be securely shredded and electronic data will be securely deleted.
- G. Personal Data removed from an office will be subject to appropriate security measures, including keeping paper files away from public visibility, the use of passwords/passcodes and encryption of portable electronic devices and must be stored securely (e.g. not left in the boot of a car).

When receiving telephone or email enquiries, employees, volunteers and members will be required to exercise caution before disclosing any Personal Data and will:

- A. Not give out Personal Data over the telephone unless in very limited circumstances where they know or can verify the caller's identity and their entitlement to receive the information requested;
- B. Require callers to put their requests in writing so their identity and entitlement to receive the information may be verified;
- C. Ensure Personal Data is securely packaged and consider the most appropriate means by which the data should be sent (e.g. registered delivery, courier or hand delivery);
- D. Refer to the Data Protection Officer for assistance in difficult situations and in all cases involving Sensitive Personal Data.

### **{4} Sharing personal data;**

Personal data will not be shared with any third party except for the purposes described in this privacy policy.

- a. For those, non Irish Nationals, wishing to join and/or work with Céilí we may be obliged to inform or communicate with the Gardai and/or Immigration/Customs control:
- b. If the need arises legal and other professional advisers, law courts and law enforcement bodies in all countries we operate in, in order to enforce Céilí's legal rights;
- c. Personal details about people's physical or mental health, alleged convictions, and/or criminal offences are considered "sensitive" personal data. Céilí will only process such data if the person concerned has given his/her explicit consent to do so except in circumstances where this information needs to be shared because of important and vitally grave reasons in order to protect the person themselves, Céilí Community, its members its work and/or a third party.
- d. Personal Data will only be transferred to a third-party acting as a Data Processor (such as a contractor or supplier) if Céilí's Data Protection Officer is satisfied that the third party has in place adequate policies and procedures to ensure compliance with data protection legislation. Data sharing agreements will be used where appropriate

## **{5} Cookies:**

"Cookies" are small text files that are stored on your computer's hard drive or mobile devices when you visit a website. They allow the website to recognise your device and remember if you have been to the website before.

Cookies are very common web technology – most websites use cookies and have done so for years. Cookies are used to make websites work more efficiently, as well as providing information to the owners of the website.

Cookies are used to measure which parts of the website people visit and to customise your experience. Cookies also provide information that helps the website owner to monitor and improve the website's performance.

Céilí does not, at this time, use tracking software to monitor customer traffic patterns and site usage to help it develop the design and layout of the websites. However, this may change in the future and Céilí reserves the right to use such technology.

## **{6} Data Protection Officer**

We have appointed Msgr Pat Lynch as Data Protection Officer ("DPO") to oversee compliance with this policy. Any queries or questions regarding this policy and how we handle your personal information should be addressed to The Data Protection Officer.

Complaints relating to data protection should in the first instance be addressed to Peter Dunne. [peterdunne07@gmail.com](mailto:peterdunne07@gmail.com)

## **{7} How Céilí deals with your data protection rights**

By law you have the right to:

- A. Request information about whether Céilí holds personal information about you, and if so, what that information is and why Céilí is holding/using it.
- B. Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information Céilí holds about you and to check that Céilí is lawfully processing it.
- C. Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information Céilí holds about you corrected.
- D. Request erasure of your personal information. This enables you to ask Céilí to delete or remove personal information where there is no good reason for Céilí continuing to process it.
- E. Request the restriction of processing of your personal information. This enables you to ask Céilí to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- F. Withdrawal of consent. Once Céilí has received notification that you have withdrawn your consent, Céilí will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Céilí may need to request specific information from you to help Céilí confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

## **{8} How Céilí deals with the data protection rules;**

Our Privacy Policy may change from time to time and any changes to this policy will be communicated to you by way of our website [www.ceilicommunity.net](http://www.ceilicommunity.net)

This policy was approved by the Céilí Executive Council

4 December 2018

The next review is due on or before:

30 December 2019

## **{9} All personal data is collected and processed in accordance with Irish and EU data protection laws.**

Céilí will comply as a Data Processor with the eight data protection principles, which provide that Personal Data must be:

- A. Processed fairly and lawfully
- B. Obtained for specified and lawful purpose(s)
- C. Adequate, relevant and not excessive for the purpose(s)
- D. Accurate and kept up to date
- E. Not kept longer than necessary for the specified purpose(s)
- F. Processed in accordance with Data Subjects' rights
- G. Secure
- H. Not transferred outside of the EEA without adequate data protection

The above policy applies to all Personal Data created, stored or otherwise processed by Céilí Community in whatever format (e.g. paper, electronic, film) and however it is stored (e.g. electronically or in filing cabinets). It also includes information that is in paper form but intended to be put onto a computer.