



**Christ  
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Cathedral**  
Dublin

The Cathedral of the Holy Trinity  
Founded c.1030  
Christ Church Cathedral  
Christchurch Place,  
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[christchurchcathedral.ie](http://christchurchcathedral.ie)

## **Christ Church Cathedral Data Protection Policy and Data Protection Notice**

### **Introduction**

The **General Data Protection Regulation** and Data Protection Acts 1988-2018 apply to the processing of personal data. Christ Church Cathedral is committed to complying with its legal obligations in this regard. The organisation collects and processes personal data relating to its employees in the course of business in a variety of circumstances, e.g., recruitment, training, payment, performance reviews, and to protect the legitimate interests of the organisation.

This policy covers any employee about whom this organisation processes data. This may include current and former employees. Processing of data includes: collecting; recording; storing; altering; disclosing; destroying; and blocking.

Personal data kept by this organisation shall normally be stored on the employee's personnel file (or HR electronic database). Highly sensitive data, such as medical information, will be stored in a separate file, to ensure the highest levels of confidentiality. The organisation will ensure that only authorised personnel have access to an employee's personnel file.

It may be necessary to store certain other personal data outside the HR department, e.g., salary details will be stored in the payroll department. The employee's manager or supervisor may have access to certain personal data where necessary. The organisation has appropriate security measures in place to protect against unauthorised access. These security measures include: for example, ensuring documents are password protected where appropriate and keeping personal sensitive information locked in cabinets and offices where required.

### **Rationale**

Christ Church Cathedral must comply with the Data Protection principles set out in the relevant legislation. This Policy applies to all Personal Data collected, processed and stored by Christ Church Cathedral in relation to its staff, service providers and clients in the course of its activities. Christ Church Cathedral makes no distinction between the rights of Data Subjects who are employees, and those who are not. All are treated equally under this Policy.



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## **Scope**

This policy covers both personal and sensitive personal data held in relation to data subjects by Christ Church Cathedral. The policy applies equally to personal data held in manual and automated form.

All Personal and Sensitive Personal Data will be treated with equal care by Christ Church Cathedral. Both categories will be equally referred to as Personal Data in this policy, unless specifically stated otherwise.

This policy should be read in conjunction with the associated Subject Access Request procedure, the Data Retention and Destruction Policy, the Data Retention Periods List and the Data Loss Notification procedure.

## **Christ Church Cathedral as a Data Controller**

In the course of its daily organisational activities, Christ Church Cathedral acquires, processes and stores personal data in relation to:

- Employees of Christ Church Cathedral
- Visitors of Christ Church Cathedral
- Third party service providers engaged by Christ Church Cathedral

In accordance with the Irish Data Protection legislation, this data must be acquired and managed fairly. Not all staff members will be expected to be experts in Data Protection legislation. However, Christ Church Cathedral is committed to ensuring that its staff have sufficient awareness of the legislation in order to be able to anticipate and identify a Data Protection issue, should one arise. In such circumstances, staff must ensure that the Data Protection Officer is informed, and that appropriate corrective action is taken.

Due to the nature of the services provided by Christ Church Cathedral, there is regular and active exchange of personal data between Christ Church Cathedral and its Data Subjects. In addition, Christ Church Cathedral exchanges personal data with Data Processors on the Data Subjects' behalf. This is consistent with the organisations obligations under the terms of its contract with its Data Processors.

This policy provides the guidelines for this exchange of information, as well as the procedure to follow in the event that a Christ Church Cathedral staff member is unsure whether such data can be disclosed.



In general terms, the staff member should consult with the Data Protection Officer to seek clarification.

### **Third-Party processors**

In the course of its role as Data Controller, Christ Church Cathedral engages a number of Data Processors to process Personal Data on its behalf. In each case, a formal, written contract is in place with the Processor, outlining their obligations in relation to the Personal Data, the specific purpose or purposes for which they are engaged, and the understanding that they will process the data in compliance with the Irish Data Protection legislation.

These Data Processors include, for example;

- Support IT
- Robertson Low Insurance company

### **The Data Protection Principles**

The following key principles are enshrined in the Irish legislation and are fundamental to the Christ Church Cathedral's Data Protection policy.

In its capacity as Data Controller, Christ Church Cathedral ensures that all data shall:

1. ... be obtained and processed fairly and lawfully.

For data to be obtained fairly, the data subject will, at the time the data are being collected, be made aware of:

- The identity of the Data Controller (Christ Church Cathedral)
- The purpose(s) for which the data is being collected
- The person(s) to whom the data may be disclosed by the Data Controller
- Any other information that is necessary so that the processing may be fair.



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Christ Church Cathedral will meet this obligation in the following way:

- Where possible, the informed consent of the Data Subject will be sought before their data is processed;
- Where it is not possible to seek consent, Christ Church Cathedral will ensure that collection of the data is justified under one of the other lawful processing conditions – legal obligation, contractual necessity, etc.;
- Where Christ Church Cathedral intends to record activity on CCTV or video, a Fair Processing Notice will be posted in full view;
- Processing of the personal data will be carried out only as part of Christ Church Cathedral's lawful activities, and Christ Church Cathedral will safeguard the rights and freedoms of the Data Subject;
- The Data Subject's data will not be disclosed to a third party other than to a party contracted to Christ Church Cathedral and operating on its behalf.

2. .... be obtained only for one or more specified, legitimate purposes.

Christ Church Cathedral will obtain data for purposes which are specific, lawful and clearly stated. A Data Subject will have the right to question the purpose(s) for which Christ Church Cathedral holds their data, and Christ Church Cathedral will be able to clearly state that purpose or purposes.

3. .... not be further processed in a manner incompatible with the specified purpose(s).

Any use of the data by Christ Church Cathedral will be compatible with the purposes for which the data was acquired.

4. .... be kept safe and secure.

Christ Church Cathedral will employ high standards of security to protect the personal data under its care. Appropriate security measures will be taken to protect against unauthorised access to, or alteration, destruction or disclosure of any personal data held by Christ Church Cathedral in its capacity as Data Controller.

Access to and management of staff and customer records is limited to those staff members who have appropriate authorisation and password access.

5. ... be kept accurate, complete and up-to-date where necessary.

Christ Church Cathedral will:



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- ensure that administrative and IT validation processes are in place to conduct regular assessments of data accuracy;
  - conduct periodic reviews and audits to ensure that relevant data is kept accurate and up-to-date. Christ Church Cathedral conducts a review of sample data every six months to ensure accuracy; Staff contact details and details on next-of-kin are reviewed and updated every two years.
  - conduct regular assessment to establish the need to keep certain Personal Data.
6. ... be adequate, relevant and not excessive in relation to the purpose(s) for which the data were collected and processed.

Christ Church Cathedral will ensure that the data it processes in relation to Data Subjects are relevant to the purposes for which those data are collected. Data which are not relevant to such processing will not be acquired or maintained.

7. ... not be kept for longer than is necessary to satisfy the specified purpose(s).

Christ Church Cathedral has identified an extensive matrix of data categories, with reference to the appropriate data retention period for each category. The matrix applies to data in both a manual and automated format.

Once the respective retention period has elapsed, Christ Church Cathedral undertakes to destroy, erase or otherwise put this data beyond use.

8. ... be managed and stored in such a manner that, in the event a Data Subject submits a valid Subject Access Request seeking a copy of their Personal Data, this data can be readily retrieved and provided to them.

Christ Church Cathedral has implemented a Subject Access Request procedure by which to manage such requests in an efficient and timely manner, within the timelines stipulated in the legislation.

## **Data Subject Access Requests**

As part of the day-to-day operation of the organisation, Christ Church Cathedral staff engage in active and regular exchanges of information with Data Subjects. Where a formal



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request is submitted by a Data Subject in relation to the data held by Christ Church Cathedral, such a request gives rise to access rights in favour of the Data Subject.

There are specific time-lines within which Christ Church Cathedral must respond to the Data Subject, depending on the nature and extent of the request. These are outlined in the attached Subject Access Request process document.

Christ Church Cathedral staff will ensure that, where necessary, such requests are forwarded to the Data Protection Officer in a timely manner, and they are processed as quickly and efficiently as possible, but within not more than 40 days from receipt of the request.

## **Implementation**

As a Data Controller, Christ Church Cathedral ensures that any entity which processes Personal Data on its behalf (a Data Processor) does so in a manner compliant with the Data Protection legislation.

Failure of a Data Processor to manage Christ Church Cathedral data in a compliant manner will be viewed as a breach of contract and will be pursued through the courts.

Failure of Christ Church Cathedral's staff to process Personal Data in compliance with this policy may result in disciplinary proceedings.

## **Collection and storage of data**

Christ Church Cathedral processes certain data relevant to the nature of the employment of its employees to comply with relevant legal obligations, to perform the employment contract and, where necessary, to protect its legitimate business interests and the rights and entitlements of employees. We will ensure that personal data will be processed in accordance with the principles of data protection, as described in the GDPR and Data Protection Acts.

Personal data is normally obtained directly from the employee concerned. In certain circumstances, it will, however, be necessary to obtain data from third parties, e.g., references from previous employers. Where relevant to the nature of the work, the organisation may make an application to the Garda Vetting Bureau for Garda clearance of an employee.

Personal data collected by the organisation is used for ordinary HR management purposes. Where there is a need to collect data for another purpose, the organisation shall inform you of this. In cases where it is appropriate to get your consent to such processing, the





organisation will do so.

Employees are responsible for ensuring that they inform the HR department of any changes in their personal details, e.g. change of address. Managers and supervisors must inform the HR department of any changes in employees' personal details, e.g. promotion, pay increases. We endeavour to ensure personal data held by the organisation is up to date and accurate.

### **Retention of data**

The organisation is under a legal obligation to keep certain data for a specified period of time. In addition, the organisation will need to keep personal data for a period of time in order to protect its legitimate interests. For further information regarding relevant retention periods, employees should refer to the data retention policy document.

### **Security and disclosure of data**

The organisation will take all reasonable steps to ensure that appropriate security measures are in place to protect the confidentiality of both electronic and manual data. Security measures will be reviewed from time to time, having regard to the technology available, the cost and the risk of unauthorised access. Employees must implement all organisational security policies and procedures, e.g. use of computer passwords, locking filing cabinets etc. HR files are stored in the Dean's office and employees who have access to these files (i.e. the HR Manager) must ensure that they treat them confidentially. Employees working in the payroll department must treat all personal data they receive confidentially and must not disclose it, except in the course of their employment.

All employees will have access to a certain amount of personal data relating to colleagues, customers and other third parties. Employees must play their part in ensuring its confidentiality. They must adhere to the following data protection principles:

- Process data fairly, lawfully and transparently
- Keep data only for specified, explicit and legitimate purpose(s)
- Process data only in ways which are compatible with the purpose(s) for which it was given
- Ensure data is accurate and up-to-date
- Ensure data is adequate, relevant and limited to what is necessary for the purpose for which it was given
- Keep data safely and securely
- Retain personal data for no longer than is necessary for the purpose for which it is processed and in line with the company's data retention policy



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Employees must not disclose personal data, except where necessary in the course of their employment, or in accordance with law. They must not remove or destroy personal data except for lawful reasons and with the permission of the organisation.

Any breach of the data protection principles is a serious matter and may lead to disciplinary action up to and including dismissal. If employees are in any doubt regarding their obligations, they should contact the data protection officer Abigail Sines, [abigail@christchurch.ie](mailto:abigail@christchurch.ie)

### **Medical data**

The organisation carries out pre-employment medicals as part of the recruitment process or/and medicals during the employee's time at the company. This data will be retained by the organisation. Occasionally, it may be necessary to refer employees to the organisation's doctor for a medical opinion and all employees are required by their contract of employment to attend in this case. Christ Church Cathedral may receive certain medical information, which will be stored in a secure manner with the utmost regard for the confidentiality of the document. The organisation does not retain medical reports on job applicants who do not become employees for longer than is necessary and in line with our data retention policy.

Safeguards are applied to the processing of medical data of employees. These include:

- Limitations on access to prevent unauthorised consultation, alteration, disclosure or erasure of personal data
- Strict time limits for erasure of personal data in line with our retention policy
- Specific targeted training for those involved in handling medical data
- Logging mechanisms to permit verification of whether and by whom personal data has been consulted, altered, disclosed or erased
- A requirement that medical examinations are undertaken only by our occupational health specialists
- Encryption

Employees are entitled to request access to their medical reports. Should an employee wish to do so, please contact the HR department, which will consult with the doctor who examined you and request the data. The final decision lies with the doctor. Employees are required to submit sick certificates in accordance with the sick pay policy. These will be stored by the organisation, having the utmost regard for their confidentiality.

### **E-mail monitoring**

The organisation provides e-mail facilities and access to the internet. In order to protect against the dangers associated with e-mail and internet use, screening software is in place to monitor e-mail and web usage. Mailboxes are only opened:





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- upon specific authorisation by a manager in cases where the screening software or a complaint indicates that a particular mailbox may contain material that is dangerous or offensive;
- where there is a legitimate work reason or in the legitimate interest of the organisation.

Please refer to the e-mail and internet usage policies for further details.

### **Closed circuit monitoring**

The organisation has closed circuit television (CCTV) cameras located in the cathedral and surrounding areas. This is necessary in order to protect against theft or pilferage, for the security of staff and organisation property. Access to the recorded material will be strictly limited to authorised personnel. Closed circuit surveillance is not used to manage performance and/or employee discipline.

### **Data Protection Officer**

Abigail Sines, [abigail@christchurch.ie](mailto:abigail@christchurch.ie), is the data protection officer for this organisation. She is responsible for monitoring and maintaining compliance with data protection legislation. All employees must co-operate with the data protection officer when carrying out their duties.

The data protection officer is also available to answer queries or deal with employees' concerns about data protection.

### **Access requests**

Employees are entitled to request data held about them on computer or in relevant filing sets. The organisation will, in most circumstances provide this data within one month. In some cases, due to the complexity of the request or the number of requests being handled by the organisation, the organisation may require a further two months to provide this data. There is no charge for requesting this data.

An employee should make a request in writing to the data protection officer, stating the exact data required. Employees are only entitled to access data about themselves and will not be provided with data relating to other employees or third parties. It may be possible to block out data relating to a third party or conceal his or her identity, and if this is possible the organisation may do so.

Data that is classified as the opinion of another person will be provided unless it was given on the understanding that it will be treated confidentially. Employees who express opinions about other employees in the course of their employment should bear in mind that their opinion may be disclosed in an access request, e.g., performance appraisals.



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In some circumstances where relevant exemptions apply, certain personal data may not be provided to an employee. An employee will be informed where personal data is not being disclosed on the basis of such an exemption.

An employee who is dissatisfied with the outcome of an access request has the option of using the organisation's grievance procedure. He/she may also refer a complaint to the Data Protection Commissioner.

### **Right to object**

Employees have the right to object to data processing that is causing them distress and/or correct personal data which is inaccurate. Where such objection is justified, the organisation will cease processing the data unless it has a legitimate interest that prevents this. The organisation will make every effort to alleviate the distress caused to the individual.

An objection should be made in writing to the data protection officer, outlining the data in question and the harm being caused to the employee.



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## **DEFINITIONS:**

### **Data**

This includes both automated and manual data.

Automated data means data held on computer or stored with the intention that it is processed on computer.

Manual data means data that is processed as part of a relevant filing system, or which is stored with the intention that it forms part of a relevant filing system.

### **Personal Data**

Information which relates to a living individual, who can be identified either directly from that data, or indirectly in conjunction with other data which is likely to come into the legitimate possession of the Data Controller. (If in doubt, Christ Church Cathedral refers to the definition issued by the Article 29 Working Party and updated from time to time.)

### **Sensitive Personal Data**

A particular category of Personal data, relating to: Racial or Ethnic Origin, Political Opinions, Religious, Ideological or Philosophical beliefs, Trade Union membership, Information relating to mental or physical health, information in relation to one's Sexual Orientation, information in relation to commission of a crime and information relating to conviction for a criminal offence.

### **Data Controller**

A person or entity who, either alone or with others, controls the content and use of Personal Data by determining the purposes and means by which that Personal Data is processed.

### **Data Subject**



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A living individual who is the subject of the Personal Data, i.e. to whom the data relates either directly or indirectly.

### **Data Processor**

A person or entity who processes Personal Data on behalf of a Data Controller on the basis of a formal, written contract, but who is not an employee of the Data Controller, processing such Data in the course of his/her employment.

### **Data Protection Officer**

A person appointed by Christ Church Cathedral to monitor compliance with the appropriate Data Protection legislation, to deal with Subject Access Requests, and to respond to Data Protection queries from staff members and service recipients.

### **Relevant Filing System**

Any set of information in relation to living individuals which is not processed by means of equipment operating automatically (computers), and that is structured, either by reference to individuals, or by reference to criteria relating to individuals, in such a manner that specific information relating to an individual is readily retrievable.



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### **Review**

**This policy will be reviewed from time to time to consider changes in the law and the experience of the policy in practice.**

## **CHRIST CHURCH CATHEDRAL DATA PROTECTION NOTICE**

Christ Church Cathedral has created this data protection notice as the controller of employees' personal data to demonstrate our firm commitment to privacy and to inform employees about the information we collect and process in connection with your employment. If you have any queries about this notice, please contact our Data Protection Officer, Abigail Sines, [abigail@christchurch.ie](mailto:abigail@christchurch.ie) or HR Manager Michelle Carton.

This notice sets out an explanation of what information about you we process, why we process your information, with whom your information is shared and a description of your rights with respect to your information.

### **What information do we process?**

As your employer, we need to keep and process certain information about you for normal employment and HR management purposes, to comply with our legal obligations and, where necessary, to protect our legitimate business interests. We will collect and process information from you during the recruitment process, during our employment relationship and following the termination of our employment relationship.

Personal data is normally obtained directly from you. In certain circumstances, it will, however, be necessary to obtain data from internal third parties, e.g. your line manager, or from external third parties, e.g. references from previous employers, the Revenue Commissioners etc. Due to the nature of the work, the organisation may make an application to the Garda Vetting Bureau for Garda clearance of an employee.

The categories of personal data we process and the legal bases for doing so are set out in more detail in the appendix to this notice.



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### **How do we use your information?**

The information we hold, and process will be used for management and administrative purposes. We keep it and use it to enable us to run our business, manage our employment relationship with you effectively, lawfully and appropriately and protect employees' rights and interests. This includes using your information to enable us to manage the employment contract, comply with legal obligations, pursue our legitimate interests and protect our legal position in the event of legal proceedings against the company.

The uses we make of each category of your personal data, together with the legal bases we rely on for those uses are set out in more detail in the appendix to this notice.

Where there is a need to process your data for a purpose other than those set out in the appendix or otherwise outlined to you, we will inform you of this.

### **How is your information shared?**

Your information may be disclosed to third parties where we are legally obliged to do so or where our employment contract requires or permits us to do so. For example, we pass on certain information to our pension providers.

More detailed information on how we share your personal data is set out in the appendix.

### **Will your information be transferred abroad?**

Your information will not be transferred abroad.

### **How long do we keep your information?**

Any personal data processed about you is retained only for as long as it is required. For further information regarding retention periods, please refer to our retention records document.

### **What happens if you do not provide us with your information?**

In some cases, you may decline to provide us with your personal data. However, if we believe that we require relevant information to effectively and properly manage our employment relationship, we may not be able to continue our employment relationship with you if you decline to provide us with that personal data.





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### **Will you be subject to profiling or automated decision making?**

You will not be subject to automated decision making or profiling.

### **What are your rights under data protection law?**

You have the following rights under data protection law, although your ability to exercise these rights may be subject to certain conditions:

- the right to receive a copy of and/or access the personal data that we hold about you, together with other information about our processing of that personal data;

- the right to request that any inaccurate data that is held about you is corrected, or if we have incomplete information you may request that we update the information such that it is complete;

the right, in certain circumstances, to request that we erase your personal data;

- the right, in certain circumstances, to request that we no longer process your personal data for particular purposes, or object to our use of your personal data or the way in which we process it;

- the right, in certain circumstances, to transfer your personal data to another organisation;

- the right to object to automated decision making and/or profiling; and

- the right to complain to the Data Protection Commissioner.

### **Further information**

If you have any queries in relation to this data protection notice, or if you have any concerns as to how your data is processed, please contact the Data Protection Officer (DPO) Abigail Sines, [abigail@christchurch.ie](mailto:abigail@christchurch.ie) /HR Manager

[michelle.carton@christchurch.ie](mailto:michelle.carton@christchurch.ie)



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## **Review**

This data protection notice will be reviewed from time to time to take into account changes in the law in line with GDPR and the experience of the notice in practice.

## **APPENDIX**

### **Category of data**

### **Elements of data**

### **Purpose for processing and uses of the data**

### **Legal basis for processing the data**

### **Categories of recipients**



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### **Recruitment related data**

*List of relevant personal data collected as part of the recruitment process:*

<b>curriculum vitae;</b>	To establish work and educational history & and assess candidate suitability for the role
<b>contact details;</b>	To liaise with the candidate and schedule interviews
<b>date of birth;</b>	To ensure they are above the minimum age required
<b>referee names;</b>	To carry out reference checks
<b>interview notes;</b>	Required to keep these for 2 years and useful in case of grievances or equality issues

The processing is necessary to enter into a contract with the employee and for our legitimate interests in managing an effective recruitment process in circumstances where such interests are not overridden by the rights and freedoms of employees.

### **Consequences for the individual of not providing the data**

The organisation may be unable to consider their application for employment.

### **Third parties who may receive this information.**

HR advisors;  
Legal advisors.



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### **Personnel file**

*List of personal data contained in personnel file*

<b>contracts of employment;</b>	To comply with employment laws
<b>contact details;</b>	To liaise with the employee regarding employment & HR matters
<b>PPS number;</b>	To comply with revenue laws
<b>pay details;</b>	To facilitate payment of salary
<b>bank account details;</b>	To facilitate payment of salary
<b>working hours;</b>	To comply with employment laws
<b>annual leave;</b>	To comply with employment laws
<b>public holiday records;</b>	To comply with employment laws
<b>emergency contact details;</b>	Collected from employees to protect employees' vital interests in the event of an accident or emergency.

### **Purpose and uses to which the data may be put**

The processing is necessary to comply with various employment and Revenue laws. The processing is also necessary for the performance of the employment contract. Emergency contact details are collected from employees to protect employees' vital interests in the event of an accident or emergency.

### **Consequences for the individual of not providing the data**

Where the individual does not provide the requested data, the organisation may be unable to continue their employment.

### **Third parties who may receive this information**

Revenue Commissioners;  
Department of Social Protection;  
Workplace Relations Commission.



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## **Payroll**

*List of personal data contained in personnel file*

<b>contact details;</b>	To liaise with the employee and circulate payslips e.g. via email
<b>PPS number;</b>	To comply with revenue laws
<b>pay details;</b>	To facilitate payment of salary To ensure employees are paid in line with their contractual entitlements.
<b>bank account details;</b>	To facilitate payment of salary To ensure employees are paid in line with their contractual entitlements.
<b>working hours;</b>	To ensure employees are paid in line with their contractual entitlements.
<b>annual leave;</b>	To ensure employees are paid in line with their contractual entitlements.
<b>public holiday records;</b>	To comply with employment laws

The processing is necessary to comply with various employment and Revenue laws.  
The processing is also necessary for the performance of the employment contract.

## **Consequences for the individual of not providing the data**

Where the individual does not provide the requested data, the organisation may be unable to pay employees their contractual entitlements.

## **Third parties who may receive this information**

Revenue Commissioners;  
Department of Social Protection;  
Workplace Relations Commission.

The information may also be shared with organisations who provide services to the company, e.g. HR advisors, legal advisors, payroll providers, health insurance providers.



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### **Pension details**

*List of relevant personal data processed as part of an employee's pension entitlements.*

**contact details;**

To liaise with the employee and statutory paperwork i.e. statements

**PPS number;**

To comply with revenue laws

**pay details;**

To facilitate payment and calculation of salary  
To ensure employees are paid in line with their contractual entitlements.

### **Purpose and uses to which the data may be put**

This data may be processed to properly administer the employee's pension entitlement and to comply with pension rules.

The processing is necessary to comply with pension laws. The processing is also necessary for the performance of the employment contract. Processing of special categories of personal data is carried out for pension purposes in line with the Data Protection Acts.

### **Consequences for the individual of not providing the data**

Where the individual does not provide the requested data, the organisation may be unable to administer their pension.

### **Third parties who may receive this information**

Revenue Commissioners;

Pensions Authority;

The information may also be shared with organisations who provide services to the company, e.g. HR advisors, legal advisors, payroll providers, pension administrators, pension trustees.





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### **Performance details**

*List of relevant performance information which is processed in respect of employees*

<b>performance review forms;</b>	necessary for the performance of the employment contract
<b>notes of performance review meetings;</b>	necessary for the performance of the employment contract
<b>performance improvement plan documentation;</b>	necessary for the performance of the employment contract

### **Purpose and uses to which the data may be put**

This may be processed to manage employee performance in accordance with relevant company policies.

The processing is necessary for the performance of the employment contract and is in the legitimate interests of the employer to manage employee performance in circumstances where such interests are not overridden by the rights and freedoms of employees.

### **Third parties who may receive any of this information**

HR advisors;  
Legal advisors.



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## **Grievance, disciplinary and bullying & harassment investigations**

*List of information which may be processed during workplace investigations*

**employee complaint;**  
**investigation meeting notes;**  
**witness statements;**

### **Purpose and uses to which the data may be put**

This may be processed to ensure employee complaints are fairly and properly investigated in accordance with natural justice and relevant company policies.

The processing is necessary to comply with an employer's legal obligations to apply fair procedures to any employee investigation, for the performance of the employment contract and in the legitimate interests of the employer to fully investigate employee complaints in circumstances where such interests are not overridden by the rights and freedoms of employees.

### **Third parties who may receive any of this information**

Workplace Relations Commission;  
independent investigators;  
HR advisors;  
Legal advisors;  
Insurers.



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### **Email and internet usage**

This may include emails stored in an employee's email inbox and data relating to an employee's browsing history.

#### **Purpose and uses to which the data may be put**

It may be to protect against the dangers associated with e-mail and internet use and to ensure employees are using such systems in accordance with company policies.

The processing is in the legitimate interests of the employer to manage employee performance and ensure the security of e-mail and internet systems in circumstances where such interests are not overridden by the rights and freedoms of employees.

#### **Third parties who may receive any of this information**

IT system providers;  
HR advisors;  
Legal advisors;  
IT security advisors.



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### **Medical information**

*List of medical data which may be processed by the company in the course of employment.*

**sick certificates;  
sick leave records,  
sick pay records;  
occupational health assessments.**

### **Purpose and uses to which the data may be put**

To manage employee absences, to manage sick pay in accordance with the contract of employment, to allow the company to assess the fitness to work of relevant employees.

The processing is necessary to assess, subject to appropriate safeguards, the working capacity of the employee and to carry out obligations and exercise rights under employment law.

### **Third parties who may receive this information**

Revenue Commissioners;  
Department of Social Protection;  
Workplace Relations Commission;  
Occupational health specialist;  
HR advisors;  
Legal advisors;  
Payroll;  
Insurers.



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## **Termination of employment**

*List of personal data which may be processed by the company in the course of the termination of employment.*

**resignation letters;**  
**exit interviews;**  
**reference letters.**

### **Purpose and uses to which the data may be put**

To properly manage the termination of the employment relationship.

The processing is necessary to comply with the employment contract and is in the legitimate interests of the employer to properly manage the termination of the employment relationship in line with company policies in circumstances where such interests are not overridden by the rights and freedoms of employees.

### **Third parties who may receive this information**

Revenue Commissioners;  
Department of Social Protection;  
Workplace Relations Commission;  
HR advisors;  
Legal advisors;  
Payroll providers.