



**Christ
Church
Cathedral**
Dublin

The Cathedral of the Holy Trinity
Founded c.1030
Christ Church Cathedral
Christchurch Place,
D08 TF98, Ireland

Tel +353 (01) 677 8099
welcome@christchurch.ie
christchurchcathedral.ie

Christ Church Cathedral Data Protection Policy

Christ Church Cathedral will comply with the requirements of the General Data Protection Regulation (GDPR) 2016/679, the relevant Data Protection Acts 1988-2018 and the ePrivacy Regulations S.I. 336/2011.

Christ Church Cathedral are committed to ensuring lawful, fair, transparent, secure, accurate and limited processing of personal data.

Purpose

The purpose of this policy is to set out how Christ Church Cathedral seeks to protect personal data and to ensure that employees understand the rules governing how they use the personal data to which they have access to during the course of their work.

Scope

This policy extends to personal data relating to current, former and potential employees, parishioners, corporate clients, suppliers, visitors and business contacts (referred to as 'you', 'data subjects'). It includes both personal and sensitive data (equally referred to as 'personal data' unless otherwise stated) which is held in either manual or automated form.

How to contact us

Christ Church Cathedral (referred to as 'we', 'us', 'our') is the Data Controller. Our registered address is

Christ Church Cathedral Dublin,
Christchurch Place,
Dublin 8,
D08 TF98.

Email: welcome@christchurch.ie.

Tel: 01 677 8099.

For data protection queries please see Appendix 1.

Definitions

'Data Subject' is a natural living individual who can be identified either directly or indirectly. In this case they are a current, former and potential employees, customers, suppliers, visitors and business contacts.

Further definitions are available in Appendix 2.

Related Documents

This policy should be read in conjunction with the following documents:



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- Data breach management policy
- Data Subject Rights Policy
- Information Security Management Policy
- Website Privacy Notice
- Data Retention & Destruction Policy

Data Controller

Christ Church Cathedral is the Data Controller where it decides on the purpose and means of processing the personal data. Examples include but are not limited to:

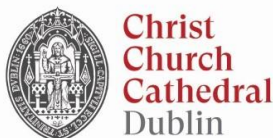
- Employee data where we decide what systems are used to process the data.
- Data about our parishioners or visitors to the Cathedral where they attend one of our services and/or wish to receive a religious sacrament.
- Corporate client data where we decide why the data is being collected such as to issue an invoice so that we can get paid.
- Visitor data where we get permission from visitors to send them marketing / promotional messages or where we decide that we will use CCTV monitoring for security reasons.

The data controller status for each processing activity is recorded in a Record of Processing Activity (ROPA).

Data Protection Principles

Christ Church Cathedral will comply with data protection law. The law states that the personal data we process about data subjects must be:

- (1) Used **lawfully, fairly and in a transparent** manner; Christ Church Cathedral will do this in the following way:
 - We will always have a lawful basis when processing personal data.
 - We will inform you how we process your personal data via data protection related policies (e.g., this data protection policy and our website data protection notice).
- (2) Collected only for **valid purposes**; we will explain to you, at the point of collection, why we process your personal data and will assure you that it will only be processed for the purpose stated.
- (3) **Accurate** and kept up to date; we ask that you notify us if your personal details have changed. Christ Church Cathedral will ensure quality assurance procedures are in place for regular assessment of data accuracy.
- (4) Kept to a **minimum**; we will only collect, store and use data about you that is required. We will only process the minimum amount of data that is required to achieve the purpose for which it is collected.



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- (5) We will only store your personal data for a **limited period only** so as to achieve the intended purpose(s). We have identified an appropriate retention period for all categories of data we hold. Some of these retention periods are statutory requirements. Once the respective retention period has elapsed, we undertake to destroy, erase or otherwise put this data beyond use.
- (6) **Kept Securely**; we employ a range of security measures to protect against unauthorised access to, or alteration, destruction or disclosure of any personal data held by us and our data processors.
- (7) **Accountability**; we are responsible for, and able to demonstrate compliance with the above 6 principles.

Roles and Responsibilities

Christ Church Cathedral has overall responsibility for ensuring compliance with the GDPR, Data Protection Acts and related legislation. All employees who process personal data in the course of their employment, are also responsible for ensuring compliance with this legislation.

Christ Church Cathedral will provide support, assistance, advice and training to all employees to ensure they are in a position to comply with the relevant legislation.

The following roles & responsibilities are designated:

Christ Church Cathedral is responsible for complying with the requirements of the GDPR and the relevant data protection legislation. All data processing is overseen by the CEO. Their data protection responsibilities include:

- Maintaining oversight of the day-to-day activities.
- Ensuring compliance with the GDPR and related legislation.

Person who manages Data Protection queries

This person will carry out the following tasks:

- Support employees in Christ Church Cathedral in relation to data protection queries.
- Be a point of contact for Data Subjects in relation to data protection queries.
- Co-ordinate the gathering of data arising from a subject access request.
- Co-ordinate the management of a data breach should one occur.
- Liaise with Data Subjects in relation to a data breach or subject access request, where necessary.
- Liaise with relevant data protection/IT experts/consultants.

Line Managers are responsible for:

- Ensuring the adequate storage and management of all personal data processed relating to processing of personal data.
- Ensuring that new employees are trained on systems, processes and SOPs.
- Ensuring that data protection requirements and responsibilities form part of the induction process for new employees.



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- Immediately informing the person who manages data protection of a suspected data breach, subject access request or data protection issue; and
- Liaising with the person who manages data protection when required.

Employees

- Employees are responsible for ensuring that personal data is safeguarded according to the practices outlined in this policy, procedures and SOPs assigned to them.
- Employees are responsible for complying with the Christ Church Cathedral’s training requirements.
- Employees will notify the Line Manager of any personal data errors, actual and possible data breaches and incidents, and data access requests under Articles 15 – 22, GDPR.

Types of Personal Data Collected

The following types of personal data may be processed (data includes but is not limited to):

Category	Personal Data Type
Visitor data	Identity data: Name, booking reference
	Contact data: email
	Finance data: payment record
Parishioner data (including visitors who attend a service and/or receive a sacrament)	Identity data: Name
	Contact data: address, email, tel
	Other: religious beliefs, sacrament received
Supplier, service providers & data processors	Identity: company name & contact name
	Contact data: address, email, tel/mobile number
	Finance: bank details, payment record, credit card payment, tax record
Corporate Client	Identity data: company name & contact name
	Contact data: address, email, tel/mobile
	Marketing / communication preferences
Human Resources (former, current, potential employees)	Identity data: name
	Contact data: address, email, tel/mobile number
	Finance data: bank details, PPSN/NI, salary, benefits, payslip, pension data
	Recruitment record: details contained in CV including education, qualifications, work history, interview notes, references
	HR record: performance appraisal, grievance & disciplinary record, record of training/course attended, emergency contact details, garda vetting declaration
	Email: address
Technical data: login data, log file, employee’s browsing history	



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Category	Personal Data Type
	Special category data: data concerning health (sick note), occupational health report, sick leave record, sick pay record
Company data (minutes of meetings)	Names, initials, feedback, opinions
Website	IP address, pages visited, cookie preferences

Children’s Personal Data & Data of Vulnerable Adults

Christ Church Cathedral may process children’s data and/or the images of vulnerable adults via CCTV when they visit the cathedral. In such circumstances we will ensure the appropriate security measures are in place to protect this data.

Why we process personal data

The purpose and method by which Christ Church Cathedral process personal data may vary. The primary purposes we use personal data include:

Category	Purpose of processing
Visitor data	<ul style="list-style-type: none"> Process payment fee for entry to cathedral Process marketing communication preference
Parishioners’ data (including those who receive the sacrament)	<ul style="list-style-type: none"> Vestry list – name, address, telephone number, email Regular donors – CHY 3 forms which require PPS number Congregation: births/deaths/marriages/religious information
Supplier, service providers & data processors	<ul style="list-style-type: none"> Process transactions for goods and services. Complete/maintain company accounts. Set up and process relevant accounts.
Corporate Clients	<ul style="list-style-type: none"> Set up and process customer accounts. Process payment and manage the account. Complete/maintain company accounts.
Human Resources (former, current, potential employees)	<ul style="list-style-type: none"> Manage relationship with employees. Process employee records in line with legal requirements. Pay employees as per their employment contract. Refund travel or other work-related expenses as per their employment contract. Ensure employees receive appropriate training. Process job applications. Ensure the personal data of those employees with work permits are processed in accordance with legal requirements.



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Category	Purpose of processing
Company data (minutes of meetings)	<ul style="list-style-type: none">• Manage business operations in line with internal policies and procedures.
Website	<ul style="list-style-type: none">• Analyse website functionality - website users' pattern of use to help us to improve, administer and diagnose problems with our server and website.
General	<ul style="list-style-type: none">• Respond to enquiries, complaints and feedback.• Respond to requests for data access, correction and other personal data subject rights.• Comply with applicable laws and regulatory obligations e.g., tax, health and safety and legal obligations.• Establish and defend legal rights to protect the business.

How we collect personal data

Christ Church Cathedral collects data in a variety of ways such as:

- Where you provide your personal data to us as an employee.
- Where we ask for a reference from your previous employer, or an individual nominated by you.
- Where we purchase goods or services, you will provide us with your bank details so we can pay you.
- Where you purchase goods from us and you pay us.
- Where you provide your contact details to us via the website, telephone, email, etc.

If you decide not to provide personal data

If you do not provide us with the relevant data, we may not be able to sell goods to you, offer relevant services or pay you.

Personal data provided by you about others

You may provide us with personal data about other individuals, for example, where you as an employee may provide us with an emergency contact or contact details of a referee. In such cases you should inform the relevant person that you are providing their contact details.

Lawful basis for processing

We process your personal data based on the following lawful basis:

- We will always seek your consent such as to use your photo, image or testimonial on our website or company leaflets, etc.
- We will process your personal data under your employment contract where you work with us.



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- We will process your financial data under the applicable law (e.g., to pay your salary, to comply with the requirements for tax purposes).
- We will process your personal data under 'vital interests' (e.g., where we contact an individual whom you nominate as your emergency contact in the event of a life/death or accident situation). We will however always seek an alternative lawful basis to process such data before we avail of 'vital interest'.
- We will use our legitimate interest to process your personal data where our business interest does not override your rights and freedoms (e.g., where we process your image via our CCTV system).

Christ Church Cathedral will always have an additional Article 9(2) GDPR lawful basis for processing special category data such as:

As an employee:

- For the purposes of preventative or occupational medicine (e.g., where you provide us with a sick cert for absence management purposes).
- For the purposes of carrying out our obligations in relation to your employment and under social security and social protection law (e.g., processing personal data for statutory leave requests such as maternity leave).

As a Parishioner (or person who attends our religious services and/or receives a sacrament):

- For the purposes where processing is carried out in the course of our legitimate activities as a Cathedral offering religious services with appropriate safeguards and on condition that the processing relates solely to the members or to former members of Christ Church Cathedral to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside of Christ Church Cathedral without the explicit consent of the data subjects. (e.g., data about attendance at a service which infers your religious beliefs or data relating to a sacrament which you have received).
- Where processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject. (e.g., where personal data is stored for archiving purposes).

Third parties with whom we share personal data

As part of the service provision, we may engage Data Processors to assist in the smooth running of Christ Church Cathedral. This may involve processing of personal data. In each case, a formal, written contract is in place with the data processor, outlining their data protection obligations, 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. A list of data processors is maintained by us.



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Other Recipients

For some processing activities, we are required to disclose data to 3rd parties who are not data processors acting on our behalf or data controllers on whose behalf we are working. These categories of recipients relate to employee data and data of other data subjects (where appropriate):

- Tax Authorities (e.g., Irish Revenue Commissioners)
- Law enforcement (where required for the investigation, detection or prosecution of criminal offences)
- Department of Social Protection
- Workplace Relations Commission
- Pension provider
- Specialist consultants (mediator, legal advisor, HR advisor, etc)
- Insurance company

Transfers Outside of the EEA

Christ Church Cathedral may use services provided by 3rd parties which may necessitate the transfer of personal data outside of the EU/EEA. In these instances, we will ensure such providers have an appropriate data transfer mechanism in place such as:

- Standard Contract Clauses
- An Adequacy Decision from the European Commission
- EU-US Data Privacy Framework (DPF)
- Explicit consent of the data subject.

Your Data Protection Rights

You as a data subject have various rights under data protection law. Christ Church Cathedral will ensure that your rights are protected and fulfilled as set out in the GDPR. These rights include:

- The right to request a copy of personal data, together with other information about the processing of that personal data. This is referred to as a Subject Access Request.
- The right to request that inaccurate data is corrected, or incomplete information is completed.
- The right to request the deletion of personal data.
- The right to request that personal data be no longer processed for a particular purpose, or to object to processing of personal data for particular purposes.
- The right to request a copy of personal data be provided to the data subject or a third party in a structured, commonly used machine-readable format.
- The right not to be subject to automated decision making.

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



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may also contact you to ask you for further information in relation to your request to speed up our response.

We aim to respond to such requests within one calendar month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you within a month of receiving your request and advise you of a date to expect a response which would be within the timeframe set by the GDPR.

Restriction of your rights in certain circumstances

Article 23 of the GDPR allows for your rights to be restricted in certain circumstances. In addition, the Data Protection Act 2018 contains certain provisions dealing with the restriction of rights which give further effect to the provisions of Article 23. These restrictions are discussed in more detail in our **Data Subject Rights Policy and Procedure**.

Data Breaches

Where there is a data breach including any loss, destruction, alteration or unauthorised disclosure of personal data, we will adhere to our **Data Breach Management Policy and Procedure**. Where the breach poses any risk to data subjects, we will notify the authorities no later than 72 hours after becoming aware of it.

Data Security

We will endeavour to process personal data and confidential information in a safe and secure manner and in line with our **Information Security Management Policy**.

Data Storage

Personal data is stored both in manual and electronic format. Data relating to religious sacraments is stored for historical and evidence purposes at Representative Church Body Library, Braemor Road, Newtown Little, Churchtown, Co Dublin, D14 N735.

Data Retention

We will only store personal data for as long as is necessary and for the purposes for which the data was collected. Timelines for retention are detailed in the **Data Retention Schedule**.

CCTV

We use CCTV for the purpose of health & safety of employees, general security of the Cathedral and its surrounds, crime prevention and incident investigations. These are deemed to be legitimate interests of Christ Church Cathedral. The CCTV scheme is controlled by Christ Church Cathedral. Access to recorded material is strictly limited to authorised personnel and is deleted every 30 days. Please refer to the **CCTV Data Protection Policy** for further information.



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Voice Privacy

Christ Church Cathedral strive to ensure issues/information of a sensitive nature are dealt with in a confidential manner. Christ Church Cathedral operates while ensuring that employees, parishioners, visitors, etc can place their trust in us, this includes discussions between employees during the course of their work. Christ Church Cathedral will ensure that sensitive conversations will be held in a confidential (safe) space.

Website

Christ Church Cathedral operates the website www.christchurchcathedral.ie. Details of personal data processed via this website is available in our **Website Privacy Notice**.

Social Media

Christ Church Cathedral has social media accounts including Facebook/Meta, Instagram, X (formerly known as Twitter), LinkedIn and Vimeo. Please note these social media sites are not under our control & are governed by their own privacy policies which we advise you to read.

Christ Church Cathedral is not responsible for the contents & data protection policies & practices of any third-party websites which it links to.

Photographs, Videos, Testimonials

Where Christ Church Cathedral processes personal data in the form of a photo, video or testimonial on the website, social media platforms or printed leaflets/brochures, consent of the data subject will always be sought.

Marketing/Promotion

We strive to provide you with choices in relation to how you would like us to communicate with you. For example, you may receive marketing communications from us via email if you have given us permission to send it or if you have previously purchased with us. You can opt out/unsubscribe from our mailing list at any stage.

We do not sell or distribute personal data to third parties for purposes of allowing them to market products and services to you.

Questions & Complaints

Questions and complaints about how your personal data is processed can be forwarded to hr@christchurch.ie.

As a data subject you also have the right to lodge a complaint with the Data Protection Commission (Ireland) if you are unhappy with our processing of your personal data. For more information contact the Data Protection Commission at www.dataprotection.ie. We would, however, appreciate the chance to deal with your concerns before you approach the Data Protection Commission, so please contact us in the first instance.



Appendix 1: Contact for Data Protection Queries

Name	Human Resources Manager
Email	Hr@christchurch.ie
Tel	01 677 8099

Appendix 2: Definitions

The following definitions will apply to this Policy.

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.
Special Category 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, Genetics or Biometrics
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	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.
Employee	A living individual with whom an organisation has an employment relationship, regardless of whether this relationship is based on an employment contract. This includes all current and former employees who are or have been paid through the company payroll whether permanent, temporary, full time or fixed term, as well as agency workers and contractors who have data processed.
Data Protection Manager	Their primary role is to manage data protection issues within Christ Church Cathedral.



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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.
