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
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Christ Church Cathedral

Data Subject Rights Policy

Introduction

A subject access request allows a data subject to obtain information about the kinds of data organisations process about them (Article 15, GDPR). A data subject also has other rights covered under Articles 16-23 GDPR, such as right to object to processing, request erasure, rectification, restriction and portability.

Purpose

The purpose of this document is to set out the policy for responding to subject access requests under the requirements of the General Data Protection Regulation (GDPR) and the relevant legislation, namely the Data Protection Acts 1988-2018.

Scope

This policy extends to current, former and prospective employees, contractors, volunteers, corporate clients, visitors, parishioners, suppliers and business contacts ('you', or 'data subjects') and refers to both personal and sensitive data (henceforth equally referred to as 'personal data' unless otherwise stated) which is held in either manual or automated form. Other definitions are indicated in Appendix 2. This policy should be read in conjunction with the associated **Data Subject Rights Procedure** and other Data Protection Policies.

Subject Access Request

A Subject Access Request is described by Article 15 of the GDPR as giving data subjects the right to obtain the following information from the data controller:

- Confirmation of whether personal data about them is being processed.
- Where personal data is being processed, a copy of that data.
- Where personal data is being processed, other additional information as follows:
- Purpose(s) of processing
    - Categories of data processed.
    - Who data will be transferred or disclosed to (where data is transferred to a third country, reassurance that the appropriate safeguards are in place).
    - Envisaged retention periods.
- Existence of the following rights:
    - Right to rectification
    - Right to erasure
    - Right to restrict processing
    - Right to object
- And to request these from the data controller (Christ Church Cathedral).
    - Right to lodge a complaint with the supervising authority (Data Protection Commission)

- In turn Christ Church Cathedral has the ability to ask for:
    - Proof of identity (if identity cannot be verified).
    - Specific information to assist in responding to the request e.g., date ranges/times (in the case of CCTV).

Restriction of data subject rights in certain circumstances

Article 23 of the GDPR allows for data subject rights to be restricted in certain circumstances. To review whether restrictions may apply, all data subject rights requests must be reviewed by the person responsible for data protection (see Appendix 1).

Roles & Responsibilities

Employees must be sufficiently familiar with subject access request's to be able to identify an access request. Employees who receive a subject access request should forward it to the person responsible for data protection (see Appendix 1) immediately ensuring that the notification has been received and is being acted upon.

The **person responsible for data protection** (see Appendix 1) is responsible for acting on a subject access request and concluding the request. They may delegate some or all of the work to a team member.

Format of a Subject Access Request

A subject access request can be received in writing or verbally by phone, voicemail or in person and may not always include the words 'Subject Access Request'. Subject access requests do not have to be submitted using a standardised form. Employees should be aware of their obligations to recognise a subject access request and to deal with them appropriately.

The subject access request response should be in a like for like medium. In other words, if the request is received electronically the response should be in the same format. Ideally, subject access request responses should be provided in a machine-readable format.

Requests about Children

A child or their guardian can exercise their right to access their data. Where we receive an access request from a legal guardian on behalf of a child who has had direct interaction with us, and/or where that child can understand their own rights to privacy and data protection, we will take account of the child's rights in deciding how to respond to the access request. Where the child is deemed to be old enough to understand their rights the response should be sent to them in clear, plain and easily understood language.

Personal Data

This table lists the types of personal data held by us which may be included in a subject access request response. This list is not exhaustive:

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Category	Personal Data Type
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, quotations
Corporate clients	Identity data: company name & contact name
	Contact data: address, email, tel/mobile
	Marketing/communication preferences
	Finance: payment record, purchase order number
Visitor data	Identity data: Visitors paying via website: name, address, email, phone number, country (lives in Meridian) Visitors paying via phone or email: name, address, email, phone number, country (lives in Artifax) Online travel agents: name and email address (lives in OTA portal)
	Contact data: email Visitors paying via website: name, address, email, phone number, country (lives in Meridian) Visitors paying via phone or email: name, address, email, phone number, country (lives in Artifax) Online travel agents: name and email address (lives in OTA portal)
	Marketing / communication preference
	Finance data: payment record, purchase order number
Religious services	Identity data (General Vestry members): name, address, email address
	Contact data (General Vestry members): name, address, email address
	Sacrament data: births,deaths, marriages
Human Resources (former, current, potential employees)	Identity data: name
	Contact data: address, email, tel/mobile number
	Finance data: bank details, PPSN, salary, benefits, payslip
	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
	Technical data: login data, log file
	Special category data: data concerning health (sick note, occupational health report/record), garda vetting

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Category	Personal Data Type
Volunteers (former, current, potential)	Identity data: Name
	Contact data: Contact data: address, email, tel/mobile number
	Other data: garda vetting
Facilities (CCTV, time in/out access)	Identity data: video footage, record of access (name/time)
Company data (minutes of meetings)	Names, initials, feedback, opinions
Website	IP address, pages visited, cookie preferences

A subject access request response should not include personal data relating to another data subject unless they have given their permission to do so. Please refer to the **Data Subject Rights Procedure** for further information.

Timescales

Under GDPR data controllers must respond without undue delay and **within one month** of receiving the verified request. In exceptional circumstances an extension to this timescale may be allowed.

Refusing a Subject Access Request

There are very limited grounds for refusing to comply with access requests:

- Unable to verify the data subject.
- Request is manifestly unfounded or excessive (e.g., for example where an individual makes repeated unnecessary subject access requests). In the case of repeated requests, we may either charge a fee taking into account our administrative costs in dealing with the request(s) or we may refuse to act on the request(s) if it is deemed manifestly unfounded or excessive.
- It is likely that providing a copy of the personal data would adversely affect the rights and freedoms of others.

The burden of demonstrating why a request is manifestly unfounded or excessive rests on Christ Church Cathedral.

Data Processors/Third Party

It is the responsibility of Christ Church Cathedral, where we are a Data Controller to respond to all subject access requests. Where we engage a Data Processor to process data on our behalf, they are contractually obliged to notify us of any subject access requests they receive without undue delay.

Retention

Subject access request related data will be retained for a minimum period of 12 months and a maximum of 3 years from date of completion. The duration of retention should be decided on a case-by-case basis.

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Questions & Complaints

Questions and complaints about how your personal data is processed can be forwarded to the person responsible for data protection. (See details in Appendix 1).

As a Data Subject you have the right to lodge a complaint with the Data Protection Commission if unhappy with how we process your personal data. The Data Protection Commission can be contacted 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.

Document Reviews

This policy will be reviewed and updated annually or more frequently, if necessary, to ensure that any changes are properly reflected in the policy.

Version Control

Name of Document	Data Subject Rights Policy	**Last Reviewed**	-
Version Number	V1	**Next Review**	February 2025
Date Issued	February 2024	**Document Owner**	HR Manager

Document History

Date	Current Version	Details of update	New Version	Completed by:

Appendix 1: Contact Details – Data Protection Queries

Name	Human Resources Manager
Email	hr@christchurch.ie
Telephone	01 677 8099

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Appendix 2: Definitions

For the avoidance of doubt, and for consistency in terminology, the following definitions apply within 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.
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, 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 who has an employment relationship with the organisation, 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.
Processing	Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.