



Christ Church Cathedral

Employee Data Protection Notice

Introduction

Christ Church Cathedral must comply with the requirements of the General Data Protection Regulation (GDPR) 2016/679 and the relevant Irish legislation, namely the Data Protection Acts of 1988 - 2018. The purpose of this notice is to set out how Christ Church Cathedral seeks to protect personal data of its employees, contractors, external facilitators and to ensure that you as a 'data handler' understand the rules governing how personal data to which you have access to during the course of your work.

Christ Church Cathedral (referred to as 'we', 'us', 'our') is the Data Controller. Our registered address is Christchurch Place, Dublin, D08 TF98, Ireland. Email: welcome@ChristChurch.ie, Tel: +353 (01) 677 8099. You, as an employee, contractor or external facilitator, are the Data Subject.

Data Protection Principles

We will comply with data protection law. This states that the personal data we hold about you must be:

- (1) Used lawfully, fairly and in a transparent way.
- (2) Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- (3) Accurate and kept up to date. We ask that you notify us if any of your personal details have changed.
- (4) Minimised. We will only collect, store and use data about you that is required.
- (5) Stored for a limited period only.
- (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.

Personal Data We Collect

We may process the following personal data in relation to you as an employee, contractor or external facilitator:

Personal contact details (e.g., name, residential address, contact number, email address), references & interview notes during the interview process, nationality, date of birth, PPS number, bank details, salary, benefits, payslip, details contained in CV, performance appraisal, grievance & disciplinary record, leave data, record of training/course attended, emergency contact details, opinions and feedback from meetings.

We may process data concerning health (e.g., when you submit a sick cert, data in relation to pregnancy, or where we receive an occupational health report).

Purpose of Processing

We may process your personal data for the following reasons:



- Select candidates for interview.
- Select successful candidates for a job.
- Set up new employee record.
- Carry out performance appraisals.
- Pay salary, taxes, expenses etc.
- Contact family member/friend in case of emergency.
- Process a request for leave.
- Process a request for a deduction.
- Process health data of employees so as to comply with health & safety legislation.

Lawful Basis for Processing

Under data protection legislation we are required to have an appropriate lawful basis for processing personal data and to advise our data subjects of what that basis is. The lawful bases we use to process your data include:

- We process your personal data where you request (**consent**) that a deduction be made from your salary (e.g., health insurance).
- We process your personal data under your employment '**contract**' where you work with us.
- We process your financial data under the applicable '**legal obligation**' (e.g., salary, payment details for Revenue purposes).
- We will process your personal data under '**vital interest**' (e.g., where we contact an individual whom you nominated 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 process your data for the purposes of the **legitimate interests** pursued by us or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. (e.g., CCTV recordings).
- We process data concerning health under **Article 9(2) b** such as where processing is necessary for the purposes of carrying out our obligations and exercising our specific rights as the controller or of the data subject in the field of employment (e.g., where you complete mandatory health & safety training).
- We also process data concerning health under **Article 9(2) h** such as where processing is necessary for the purposes of preventive or occupational medicine and for the assessment of the working capacity of the employee (e.g., where we request that you attend our company doctor and where they send us a report).

Third Party Data Processors

For some processing activities, we are required to disclose data to 3rd party data processors such as our IT support service. Where we use HR & finance related software systems to store your personal data we will ensure the necessary contracts and data processing agreements are in place.

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 include: tax authorities (revenue), Department of Social Protection, legal advisor, law enforcement (where required for the investigation, detection or prosecution of criminal offences).



Transfers Outside of the EEA

Generally, we do not actively transfer personal data outside of the European Economic Area (EEA), but in the event that we do, we may make use of services provided by 3rd parties which may necessitate the transfer of personal data outside of the EU/EEA. In these instances, we will choose providers who process data using the appropriate transfer mechanism such as standard contractual clauses or SCCs, (also known as Model Contract Clauses), adequacy decision from the European Commission or the EU-US Data Privacy Framework.

Your Data Protection Rights

You, as a Data Subject, have various rights under data protection law, subject to certain restrictions, in connection with the processing of personal data. These include:

- Right to access your data – the right to request a copy of the personal data that, together with other information about the processing of that personal data.
- Right to rectification – the right to request that inaccurate data is corrected, or incomplete information is completed.
- Right to erasure – the right to request the deletion of personal data.
- Right to restriction of processing or to object to processing – 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.
- Right to data portability - 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.

In order to exercise any of the above rights, please email us at hr@ChristChurch.ie.

How Long We Will Keep Your Data

We will only store your data for as long as is necessary. For the purposes described here we will store your data in accordance with Christ Church Cathedral's **Data Retention Policy**.

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Questions & Complaints

Questions and/or complaints about how your personal data is processed can be forwarded to email: hr@ChristChurch.ie.

As a data subject you also have the right to lodge a complaint with the Data Protection Commission if you are unhappy with any aspect of our processing of your personal data. Details of how to lodge a complaint can be found on the Data Protection Commission's website (www.dataprotection.ie). We would however appreciate it if you would contact us in the first instance.