

Ampleforth Abbey Trust Parishes Privacy Notice

What is the purpose of this document?

Ampleforth Abbey Trust ("the Trust") and its parishes are committed to protecting the privacy and security of personal information pertaining to parishioners and those who make use of its parishes' services and facilities.

This privacy notice describes how we collect and use personal information about you in accordance with the General Data Protection Regulation (GDPR) and relevant regulations (including the Privacy and Electronic Communications Regulations (PECR)) during and after your relationship with us.

The Trust is a "data controller". This means that we are responsible for deciding how we hold and use your personal information. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to all parishioners of Ampleforth Abbey Trust's Parishes but does not form part of any contract with you. We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about parishioners, so that you are aware of how and why we are using such information.

The following notice is inclusive of all types of data that our parishes may hold but some sections may not be relevant to all parishes, for example, not all parishes have CCTV or parish halls or properties available to rent.

Our parishes and churches are as follows:

St Benedict's Ampleforth	Diocese of Middlesbrough
St John's Easingwold	Diocese of Middlesbrough
St Laurence's Abbey Church, Ampleforth	Diocese of Middlesbrough
St Chad's Kirkbymoorside with St Mary's Helmsley	Diocese of Middlesbrough
St Aidan's, Oswaldkirk	Diocese of Middlesbrough
Our Lady and Holy Angels, Gilling East	Diocese of Middlesbrough
St Mary's Leyland	Archdiocese of Liverpool
St Joseph's Brindle	Archdiocese of Liverpool
Our Lady & All Saints, Parbold	Archdiocese of Liverpool

Data protection principles

We will comply with data protection law. This says that the personal information 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. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.

We may collect, store, and use the following categories of data about you:

- Personal information, for example: name, date of birth, gender, marital status and nationality.
- Contact details, for example: email addresses, telephone numbers, postal addresses and emergency contact numbers. These may include contact details of other members of the family/next of kin.
- Information about your family and any dependants;
- Information about your current involvement in parish activities and events;
- Financial information (e.g. bank details and details of any donations you have made to us in the past.)
- Information obtained as a result of any background checks on volunteers;
- CCTV recordings and other photographs or videos; for example, photos taken during events hosted by the parish.
- Information we collect through your use of our websites;

- Identity documents such as driving licences.
- Any other information which you choose to provide to us or that we are provided by others.

We may also collect, store and use the following "special categories" of more sensitive personal information regarding you:

- Information about your religious beliefs.
- Information about your health and wellbeing, for example, medical information, illnesses, physical disabilities, allergies and prescribed medication.
- In the case of background checks, information about criminal convictions and offences, including potential blacklist notifications.

How is your personal information collected?

We collect personal information about you from that which is provided to us when you make enquiries; join a sacramental programme; request parish newsletters; volunteer for parish duties; join a parish group or committee; request prayers, masses or other sacraments; make a gift-aided donation; or rent parish halls or property. We may also receive Personal Data about you from third parties, for example, your family members, other parishioners, our schools, dioceses, medical professionals, the police and other law enforcement bodies. In certain circumstances, third-parties, for example the police, may supply information regarding prohibited access and individuals on blacklists.

How we will use information about you

We will only use personal information relating to you when the law allows us to. Most commonly, we will use such personal information in the following circumstances:

1. Where we need to perform a contract we have entered into with you.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
4. Where you have given a freely given, specific, informed and unambiguous consent to the processing of your personal information for one or more specific purposes.
5. Where it is needed in the public interest or for official purposes.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).

Situations in which we will use your personal information

With reference to the grounds set out in the list above, we have indicated in the boxes below the purpose or purposes for which we are processing or will process your personal information, as well as indicating which categories of data are involved.

Where we need to perform a contract we have entered into with you or carrying out necessary steps prior to entering into a contract with you

1. Administering a contract with an individual wishing to rent or hire parish facilities or property.
2. Processing information in relation to the payment for the use of rental properties. This will include, where necessary, storing financial information about you.

Where we need to comply with a legal obligation

1. Complying with safeguarding obligations for example to report a concern to Children's Services. We may also have to disclose your information to third parties such as courts, the local authority or the police where legally obliged to do so.
2. Compliance with HMRC Gift Aid record-keeping.
3. Maintaining civil registers.

Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests

1. Carrying out our activities such as ministry, sacramental programmes and pastoral and spiritual care.
2. Administration and keeping our accounts and parish records up to date.
3. Processing donations or other payments you make to us, for example, for hire of facilities.
4. Maintaining and updating membership to parish groups or societies which you have chosen to join.
5. Processing data on CCTV to ensure the site is safe, this will include the storage of images on CCTV footage.

Where you have freely given, specific, informed and unambiguous consent to the processing of your personal information for one or more specific purposes

1. Subscription to parish newsletters.
2. Requests for prayers.
3. Taking and displaying photographs and video footage of you which may be published on a parish website or newsletter.
4. Where you have given consent to be contacted in a marketing or promotional capacity.

Where it is needed in the public interest or for official purposes.

- 1 Maintaining parish registers in accordance with Canon Law.

Where we need to protect your vital interests (or someone else's interests).

1. If you were unfortunate to fall ill or suffer an injury on our premises, then we may pass on information to the NHS for treatment purposes and to your family members

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract entered into with you, nor provide our range of services and facilities. Similarly, we may be prevented from complying with our legal obligations such as to ensure the health and safety of parishioners and other guests and visitors on site.

Change of purpose

We will only use your personal information for the purposes for which we collect it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

How we use particularly sensitive personal information

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. The Trust may hold special category data relating you in certain circumstances. If we do we may use it in the following ways:

1. Where you have given us your explicit consent to do so (for example, to cater for your medical or dietary needs at an event);
2. Where the processing is necessary to protect your vital interests or someone else's vital interests (for example, passing on information to the Police);
3. Where special category data which reveals religious belief and processing is carried out in the course of our legitimate interests as a religious not-for-profit organisation working with and supporting our current and former parishioners, and the information is not shared outside the parish other than with your consent (for example, baptism and confirmation records of a parishioner shared with another parish where a marriage is planned.)
4. Where the processing is necessary for the establishment, exercise or defence of legal claims;
5. Where the processing is necessary for reasons of substantial public interest (for example, where steps are taken to prevent fraud or other dishonest activity);

Do we need your consent?

We may approach you for your written consent to allow us to process certain particularly sensitive personal data about you. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that, in accordance with our written policy document, there are circumstances permitted by law where we may use particularly sensitive personal data without your consent.

Automated decision-making

We do not envisage that any decisions will be taken about you, by using automated means, however we will notify you in writing if this position changes.

Data sharing

We may have to share your personal information with third parties, including third-party service providers and other entities in the Ampleforth Abbey group, which comprises of Ampleforth Abbey Trustees, St Laurence Education Trust, Ampleforth Abbey Trading Limited and St Benet's College (the "Ampleforth Abbey Group"), or with the dioceses in which our parishes are located, or other dioceses.

We require third parties to respect the security of your data and to treat it in accordance with the law.

The dioceses in which our parishes are located have their own privacy notices which may be found as follows:

St Benedict's Ampleforth St John's Easingwold St Laurence's Abbey, Ampleforth St Chad's Kirkbymoorside with St Mary's Helmsley St Aidan's, Oswaldkirk Our Lady and Holy Angels, Gilling	Diocese of Middlesbrough https://middlesbrough-diocese.org.uk/web-site-privacy-policy/
St Mary's Leyland St Joseph's Brindle Our Lady & All Saints, Parbold	Archdiocese of Liverpool http://www.liverpoolcatholic.org.uk/privacynotice

Why might we share your personal information with third parties?

We will share your personal information with third parties where required by UK law, for example sharing Gift Aid information with HMRC; where it is necessary to administer a contract with you; or where we have another legitimate interest in doing so, for example sharing information about sacramental preparation with the diocese, or schools admissions.

Which third-party service providers process my personal information?

"Third parties" includes third-party service providers (including contractors and designated agents) and other entities within Ampleforth Abbey Group.

In line with our legal obligations we may share your personal data with local authorities such as the police.

How secure is my information with third-party service providers and other entities in our group?

All our third-party service providers and other entities in the Ampleforth Abbey Group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal information for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

When might you share my personal information with other entities in the group?

We will share your personal information with other entities in our group as part of the provision of services to you and to promote the objects and interests of the organisation.

Transferring information outside the EU

We will not normally transfer your personal information outside the EU. In circumstances where we do this we will only transfer the data to a country where you can expect a similar degree of protection in respect of personal information, or where you have explicitly requested that we share your personal information, for example, if you request that a copy of your baptism certificate or confirmation certificate be sent to a parish in another country where you are planning to get married.

Data security

We have put in place measures to protect the security of your personal information. Details of these measures are available upon request.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only

process your personal information on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

We will retain and securely destroy your personal information in accordance with our data retention policy and/or applicable laws and regulations.

In the case of parish registers, these are a permanent record and personal information contained therein is kept indefinitely.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you, for example, in submission of annual parish statistics.

Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

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 we hold about you and to check that we are lawfully processing it.

Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

Request the restriction of processing of your personal information. This enables you to ask us 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.

Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact write to or email the Parish Priest who will co-ordinate your request with the Director of Governance at Ampleforth Abbey Trust governance@ampleforth.org.uk

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us 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.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact our Data Manager at data.manager@ampleforth.org.uk. Once we have received notification that you have withdrawn your consent, we 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.

Data privacy manager

We have appointed a Data Protection Officer to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the Data Protection Officer at procurator@ampleforth.org.uk. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact our Data Protection Officer procurator@ampleforth.org.uk