



Congregation of the Passion of Jesus Christ
St. Peter's Community Centre
Charles Street
Coventry, CV1 5NP
T: 024 76 011 620
M: 0786 363 0572
E: Passionistbursar@gmail.com
<http://passionists-uk.org/>
Registered Charity Number: 234436

FINAL: Data Protection and Privacy Policy

1. About the Congregation of the Passion of Jesus Christ (St. Joseph's Province) and about data protection and privacy

1.1 **About Us:** The Congregation of the Passion of Jesus Christ (St. Joseph's Province) is a charity registered with the Charity Commission in England and Wales. Our charity number is 234436 and our administrative address is Congregation of the Passion of Jesus Christ, St. Peter's Community Centre, Charles Street, Coventry, CV1 5NP. In this statement, references to "we", "us" and "the Congregation" refers to the Congregation of the Passion of Jesus Christ (St. Joseph's Province).

1.2 **Personal Data:** this refers to information from which an individual can be identified (directly or indirectly).

1.3 **Providing Personal Data:** When you provide us with personal data in order to communicate and engage with us, we may keep a record of the data you give us in order to enable us to comply with statutory, regulatory requirements; and to meet our charitable objectives of keeping alive the memory of the Passion of Jesus Christ through our activities.

1.4 **Data Controller:** For the purposes of the General Data Protection Regulation 2016/279 (GDPR), the Congregation of the Passion of Jesus Christ (St. Joseph's Province) will be a "Data Controller" in respect of your Personal Data.

1.5 **Processing Data:** The GDPR refers to "processing" personal data and this includes recording, organising, storing, using and disposing of personal data.

1.6 **Your Right to Privacy:** You have rights with regards to how your personal data is processed. We are committed to ensuring that personal data is properly and securely managed in accordance with the most relevant data protection laws. We believe that this is an important part of building trust and confidence between us and those with whom we engage.

2. The personal data which we hold about you

2.1 What Personal Data do we hold about you? We **may** process the following types of personal data about you (*this will vary depending on the individual and the type of information we ask you to provide*):

2.1.a Your name and contact details (*e.g. address, telephone number, email, social media account name*)

2.1.b Your gender, age, date of birth, marital or civil partnership status, National Insurance number and nationality

2.1.c Information about your education, skills, work experience or qualifications

Policy Ratified by the Curia of the Congregation on: 28/11/18



Congregation of the Passion of Jesus Christ
St. Peter's Community Centre
Charles Street
Coventry, CV1 5NP
T: 024 76 011 620
M: 0786 363 0572
E: Passionistbursar@gmail.com
<http://passionists-uk.org/>
Registered Charity Number: 234436

- 2.1.d Information about ways in which you are involved with us
- 2.1.e Information about financial issues (*e.g. your bank account or details of donations you have made to us in the past or payments we have made to you*)
- 2.1.f Photographs or video recordings (*these will only and always be used with permission from you*)
- 2.1.g Information we collect through your use of our website (*e.g. IP addresses*)
- 2.1.h Special Categories of Personal Data (*e.g. this includes information about Protected Characteristics under the Equality Act 2010 only if and where we collect this information: such as religious beliefs, race and ethnic background, disability, marital and civil partnership status and/or sexual orientation; or in the case of safeguarding processes background checks, and/or information about criminal records or proceedings. It may also include information such as dietary requirements*)
- 2.1.i We may receive personal data about you from third parties (*e.g. the Police or law enforcement agencies*)

3. Processing your personal data

3.1 Processing your personal data: The personal data which we hold about you, be that collected directly from you or received from a third party may be processed in a number of different ways:

- 3.1.a To communicate with you in relation to activities undertaken by us (*e.g. news from the Congregation, religious and prayer services and/or pastoral support*)
- 3.1.b To improve the way we communicate with you (*e.g. sometimes we may ask for your feedback*)
- 3.1.c To process donations that you make to us or other payments which you make to us (*e.g. this can include bequests, Gift Aid, fundraising and legacies*)
- 3.1.d To process applications from you including grant applications, bursaries and applications for positions within the Congregation
- 3.1.e To inform and support the administration of the Congregation
- 3.1.f For audit and statistical purposes (*e.g. the annual financial audit undertaken by our Auditors: Jacob Cavenagh and Skeet*)
- 3.1.g To ensure we comply with our legal obligations (*e.g. by providing information to HMRC or the Charity Commission or in carrying out safeguarding checks*)

3.2 Information gathered from the website and social media: We may gather information from the website or from our social media pages. Information gathered from these



Congregation of the Passion of Jesus Christ
St. Peter's Community Centre
Charles Street
Coventry, CV1 5NP
T: 024 76 011 620
M: 0786 363 0572

E: Passionistbursar@gmail.com

<http://passionists-uk.org/>

Registered Charity Number: 234436

sources may be used to improve the experience of visitors and/or technical performance. We will not use this data to identify you personally.

4. The “Grounds” for processing your personal data

4.1 We must have a lawful basis for processing your personal information. This includes the following:

- 4.1.a The activities are within our legitimate charitable interests of “keeping alive the memory of the Passion” (e.g. *you are an employee with us or a volunteer or a member of a religious group which is part of the Congregation or you are the recipient of grants or other financial support or if you are a partner of the Congregation*)
- 4.1.b You have given us consent to process your information (e.g. *consent for us to communicate with you or send information about the Congregation and its activities*) (**Please note: this consent can be withdrawn at any time by contacting us below**)
- 4.1.c Personal data processing necessary for compliance with a legal obligation (e.g. *safeguarding issues*)
- 4.1.d To protect your personal wellbeing (e.g. *if you sustained an injury on one of our premises, then we could pass on your information to the NHS and/or next of kin*)

4.2 Special Categories of personal data: This may include:

- 4.2.a Personal information which you have given us explicit consent to use (e.g. *dietary requirements, medical information or information about access and mobility support*)
- 4.2.b Where the processing is necessary to protect your personal wellbeing or that of someone else (e.g. *passing on information to the Police*)
- 4.2.c Information about your involvement with the Congregation
- 4.2.c Financial information (e.g. *bank details*) and or details of donations you have made to us in the past or of grants which we have made to you in the past
- 4.2.d Where you have already made your personal information public
- 4.2.e Where the processing is necessary for legal claims
- 4.2.d Where the processing is necessary for employment and HMRC obligations
- 4.2.e Where the processing is necessary for reasons of public interest (e.g. *measures to address dishonest activities or fraud*)



Congregation of the Passion of Jesus Christ
St. Peter's Community Centre
Charles Street
Coventry, CV1 5NP
T: 024 76 011 620
M: 0786 363 0572
E: Passionistbursar@gmail.com
<http://passionists-uk.org/>
Registered Charity Number: 234436

4.3 Processing personal data concerning criminal convictions: If we process personal data concerning criminal convictions or offences we must have other legal bases for processing this information. This may include:

- 4.3.a Where it is necessary for the prevention or detection of an unlawful act or assisting others with legal or regulatory requirements relating to unlawful acts or dishonest activities (*e.g. passing the information on to the Police*)
- 4.3.b Where the Congregation is exercising obligations imposed on us by law in connection with employment or social protection (*e.g. undertaking checks on individuals prior to taking up an employment or voluntary position*)
- 4.3.c Where it is carried out to safeguard children and vulnerable adults (*e.g. a safeguarding disclosure*)
- 4.3.d Where the Congregation is beginning, pursuing or defending legal claims
- 4.3.e Where it is necessary to protect the wellbeing of an individual (*e.g. passing information to the Police*)
- 4.3.f Where it is carried out in the course of the Congregation's legitimate activities as a registered charity and a religious body (*e.g. in undertaking pastoral and religious activities*)
- 4.3.g Where an individual has given their consent to the processing of personal information

5. Who will we share your information with?

5.1 Who will we share your information with? We will only use your personal data within the Congregation and only for the purposes for which it was obtained.

5.2 Exceptions: The exceptions to 5.1 will be:

- 5.2.a You have explicitly agreed that we can share your personal data with another organisation
- 5.2.b We are permitted or required to do so (e.g. under Data Protection Rules, Order of a Court or relevant Regulatory Body or other permissions or requirements set out in this policy)

5.3 Other organisations or Agencies with whom we may share your personal data: We may share your personal data with the following:

- 5.3.a Government bodies for taxation purposes or the Police or law enforcement agencies for the prevention and detection of crime
- 5.3.b Consultants who may process data on our behalf (e.g. an IT consultant who may process your data for the sending out of emails, newsletters or magazines)

Policy Ratified by the Curia of the Congregation on: 28/11/18



Congregation of the Passion of Jesus Christ
St. Peter's Community Centre
Charles Street
Coventry, CV1 5NP
T: 024 76 011 620
M: 0786 363 0572
E: Passionistbursar@gmail.com
<http://passionists-uk.org/>
Registered Charity Number: 234436

5.3.c Sharing personal data so the Congregation can benefit from Gift Aid declarations (e.g. HMRC)

6. For how long will we keep your personal data?

6.1 Keeping your personal data: We will only keep your personal data for as long as is necessary and we will delete it when we no longer require it.

6.2 Our systems for data protection: We have in place measures designed to minimise the risk and loss or unauthorised use or disclosure of personal data that we hold. Members of the Congregation, employees, contractors and volunteers must all agree to data protection measures outlined in this policy. This policy will be reviewed and updated regularly.

7. What are your rights?

7.1 Your rights: You have rights in respect of the personal data which you provide to us: These include the following:

7.1.a The right to request a copy of some or all of the personal data that we hold about you

7.1.b The right to withdraw your consent for us to use your personal data

7.1.c The right to request that any inaccuracies in your personal data are corrected

7.1.d The right to have us restrict the processing of all or part of your personal data

7.1.e The right to request that we delete your personal data where there is no reason for us to process it

7.2 Limitations to your rights: The above rights may be limited in some situations: e.g. where we can demonstrate that we have a legal requirement to process your personal data (*see sections 2,3, 4 and 5 above*)

7.3 Proof of identity: We may need you to provide us with proof of identity for verification and data security before you can exercise your rights.

7.4 Who can exercise their rights: Rights can only be exercised by the individuals whose information is being held by the Congregation or with that individual's express permission.

7.5 Information Commissioner: If you have unresolved concerns about how we process your personal data, you can contact the Information Commissioner (ICO) www.ico.org.uk



Congregation of the Passion of Jesus Christ
St. Peter's Community Centre
Charles Street
Coventry, CV1 5NP
T: 024 76 011 620
M: 0786 363 0572

E: Passionistbursar@gmail.com

<http://passionists-uk.org/>

Registered Charity Number: 234436

8. Who to contact if you have questions?

8.1 Contacts: If you have questions about how we protect your personal data or if you would like to exercise your rights, please contact: John Thornhill (Bursar and Administration) or Paschal Somers (Passionist Development Worker) on 024 76 011 620 or email: passionistbursar@gmail.com Letters can be sent to Congregation of the Passion of Jesus Christ, St. Peter's Community Centre, Charles Street, Coventry, CV1 5NP.