



## Privacy Notice

### Carmelite Monastery of the Immaculate Conception

This Privacy Notice gives you some helpful information about who we are, what personal data we collect about you, why, who we share it with and why, how long we keep it, and your rights.

1. **Who we are:** We are the Carmelite Monastery of the Immaculate Conception (the “Charity”), an unincorporated association with its address at Roebuck Road, Dublin 14 D14 T1H9 registered charity number 20017330 and CHY 7643.
2. **What personal data we collect and why:** We collect and use personal data relating to our benefactors, our Sisters, our employees, and others who engage with us.
  - 2.1. **Benefactors and supporters:** We collect and process personal data of benefactors in relation to donations and prayer requests. Benefactors do not have to provide any personal data to us, but if you do not provide it we cannot: thank you for your donation, recover the tax-back from Revenue, contact you about the Charity’s work and events etc. We will use your personal data for the following purposes:
    - 2.1.1. **Donations:**
      - **Thanks for Donations:** If you make a charitable donation we may collect your personal data to send you a receipt and thanks for any donation. We do this on the basis of our **legitimate interests** as a charity to thank our benefactors for their support. Having taken into consideration the reasonable expectations of the benefactor based on the fact that they have made a donation to us, we believe our writing to thank them for the donation does not override their fundamental rights and freedoms. However, we notify benefactors of their right to object to receipt of any correspondence from us (see further section 7 below).

- **Accounting for donations:** Our benefactors' personal data (together with the amount of the donation) will be shared with our auditors for the purposes of preparing our financial statements as a registered charity. We will process this personal data based on our **Legal Obligation** under the Taxes Consolidation Acts 1997 and the Charities Act 2009.
  - **CHY3 or CHY4:** If you wish to enable us to claim back the tax on your donation from the Revenue Commissioners, and you complete a Form CHY3 or CHY4 for that purpose, the form will contain your PPS number and will be submitted to the Revenue Commissioners for the Charity to recover the tax back on your donation. We will process this personal data and retain this record based on our **Legal Obligation** under the Taxes Consolidation Acts 1997 and the Charities Act 2009.
- 2.1.2. To send you charity and appeals materials:** If you make a charitable donation to us or are our benefactor/supporter, we will use your personal data to send you charity and appeals materials to tell you about our other charitable projects, fundraising activities, to send you Christmas calendars or other seasonal materials by post. We do this on the basis of our **legitimate interests** as a charity to keep in touch with our benefactors by post. Having taken into consideration the reasonable expectations of our benefactors based on the fact that they have made a donation to us or otherwise supported us, we believe our writing to them by ordinary post does not override their fundamental rights and freedoms. However, we notify benefactors of their right to object to receipt of any correspondence from us (see further section 7 below). If at any time you no longer wish to receive these materials from us, you can contact us so that we can update your contact preferences.
- 2.1.3. Prayers:** Some benefactors ask us to pray for their personal special intentions. Where our benefactor specifies what those personal special intentions are (eg. their own ill-health, a family bereavement, etc) we will record the benefactor's special intentions to ensure they are remembered in our prayers for the relevant period agreed with the benefactor. If no period is agreed with the benefactor, we will process the prayer request for six months after which time the special intention data will be securely deleted. We will treat personal data submitted via prayer requests with utmost confidentiality. When recording your special intentions, we will process this personal data based on your **Consent/Explicit Consent**. Consent can be withdrawn at any time – just contact us to let us know. Where a benefactor asks us to pray for another living person with whom we have no regular contact (a "third party") we will record the benefactor's special intentions based on our **legitimate interests** to ensure that special intention is remembered in the Sisters' prayers, but in order to respect that third party's privacy we will endeavour not to record any special categories of personal data relating to that third party. We will endeavour to minimise any collection the third party's personal data, for example: *"We remember John's special intentions in our prayers"*. Where we are relying on legitimate interests, the person has the right to object at any time (see further section 7 below).
- 2.1.4. Website:** We display our email address and postal address on our website so that people can get in touch with us if they wish. If you get in touch with us and chose to provide your personal data we will use that information to contact you and/or respond to your query where relevant. We will process this based on your **Consent** and will use same for as long as it necessary to complete the purpose for which you submitted us, or for such longer period as required by law.
- 2.1.5. Cookies:** Our website utilises cookies. A cookie is a small text file stored on your computer/device when you visit a website. For example, a cookie may allow a website "remember" your actions or preferences, or it may contain data related to the function or delivery of the site. For further information, please see the Cookies Policy on our website. **Photographs:** If you attend an event at which we are taking photographs we will ask for your **Consent** to take and use your photograph. We may display these photographs in our monastery, Church, and/or use them in Carmelite literature. If you give us consent to put the photograph up on our social media page (eg. Facebook, Twitter) the photograph will also be subject to the privacy policy of the social

media site. You can withdraw your Consent at any stage, and we will remove the photograph from the social media page and/or website according to your preferences. Certain photographs will be retained in the monastery's archives for enduring historical and archival purposes to preserve a contemporaneous record of the richness and vibrancy of community life. These photographs are retained for archival purposes in the public interest (Article 89 GDPR).

**2.1.6. General charity records:** We use your personal data based on our **legitimate interests:** for proper record keeping, for good corporate governance, to manage risk, for verification purposes, to obtain professional advices (including legal advice), for insurance purposes, and for **legal claims:** to prevent fraud, to resolve disputes and take or defend litigation etc. The legitimate interests are our charitable objectives, and to run an efficient charity.

**2.2. Sisters:** (including former members and applicants etc). We collect and process personal data of Sisters. Sisters have to provide personal data to the Charity in order for the Charity to comply with canon law and civil law requirements. We will use this personal data for the following purposes:

**2.2.1. Personal information:** name; date of birth; address and contact details; CV, education and qualifications; religion; data relating to formation, discernment, and vocation; canonical processes; Vetting data and safeguarding data; PPS number; financial data; photos/images (including for CCTV); pensions and/or benefit entitlements; medical, health and occupational health data; immigration/work-visa information; information relating to recruitment, promotions, appointments processes, retirement details, next-of-kin details, biographical information including family information etc. We process this data for compliance with our **legal obligations** and for the **legitimate activities of a not-for-profit religious body**.

**2.2.2. Photographs:** We take photos and films ("images") of our Sisters for use on our website and social media account (eg. Facebook). We use these images for the purpose of maintaining a visual record of the Sisters and the vibrant life of our community. We may also display these photographs in monastery properties, Churches, and use them in Carmelite literature. Sisters are asked for their **Consent** for the use of their photographs.

**2.2.3. Medical records:** A Sister's personal data will also include all medical, nursing, care records, and any records relating to social welfare, pension and/or benefit entitlements. We process this data for compliance with our **legal obligations** and for the purposes of **preventive or occupational medicine, and the provision of health or social care or treatment**.

**2.2.4. Family information:** We also hold the address and contact details of Sisters' family members, so that we can contact them in case of an emergency. We process this data for the **legitimate activities of a not-for-profit religious body**.

**2.2.5. Archives:** Sisters' data are transferred to the archives, and held by the monastery as part of our preservation of patrimony under canon law and the public interests in maintaining archives to preserve a contemporaneous enduring historical record of monastery life. This processing is based on the lawful basis of our **legitimate activities of a not-for-profit religious body**, and for **archival purposes in the public interests**.

We use Sisters' personal data for purposes including: running the Monastery in compliance with our canon law obligations; allocating resources across our organisation; complying with all our legal obligations (in canon and civil law); complying with our obligations as a charitable body; to work in partnership with other Church bodies (eg. local parishes, National Board for Safeguarding Children in the Catholic Church in Ireland etc); to discharge our duties to our Sisters and to others; complying with our obligations to Government bodies; to manage risk; for resolving disputes and taking/defending litigation etc. We process this data for compliance with our **legal obligations** and for the **legitimate activities of a not-for-profit religious body**, for **substantial public interests** and for the **establishment, exercise or defence of legal claims**.

- 2.3. **Employees:** (including applicants): We collect and process personal data of employees (and those applying for jobs or sending us unsolicited applications). Employees have to provide the Charity with such information as is relevant to their employment, otherwise the Charity cannot comply with its legal obligations as an employer. The personal data we collect includes:
- 2.3.1. **Contact details:** your name; date of birth; address; contact details. We process this data for the **performance of a contract** (or to take steps prior to entering into a contract, namely the employment contract).
- 2.3.2. **Employment data and pre-employment checks:** CV, education, and qualifications; Vetting data and safeguarding data; registration with any other professional regulatory and/or accrediting body; PPS number; financial data; images (eg CCTV); medical, health and occupational health data; immigration/work-visa information; information relating to recruitment, promotions, and appointments processes; other IR/HR processes; pensions details etc. We process this data for the following purposes: for the **performance of a contract** (or to take steps prior to entering into a contract, namely the employment contract); due to a **legal obligation**; for the purposes of carrying out the **legal obligations of the controller in the field of employment law**, and for the purposes of **preventive or occupational medicine, for the assessment of the working capacity of the employee** and for the **establishment, exercise or defence of legal claims**.
- 2.3.3. **Legitimate activities and legal obligations:** We use personal data for purposes including: running an efficient charity; complying with our legal obligations as a charitable body; complying with our obligations as an employer; for recruitment and appointments; allocating resources to discharge our duties to all our staff and others; complying with our statutory reporting obligations to Government bodies; to manage risk; for resolving disputes and taking/defending litigation etc. We process this on the lawful basis of our **legitimate interests** and for the **establishment, exercise or defence of legal claims**.
3. **How long we keep it?:** The Charity complies with the storage limitation principle by only keeping data for the period necessary for the purposes for which the data are processed. We will retain personal data to manage risk, to prevent fraud, for insurance purposes, to resolve disputes and take or defend litigation etc. How long we retain personal data depends on various factors.
- **Short retention periods:** Some personal data is only kept for a short period. For example, CCTV recordings are held for 28 days (unless an issue is identified in which case the recording will be held for longer for transfer to An Garda Síochána and/or the monastery's insurance company and solicitors). Prayer requests for special intentions are held for a relatively short period in accordance with the wishes of the benefactor, for example if they ask us to remember them in our prayers for one month, we will retain the data for one month to fulfil their wishes.
  - **Longer retention periods:** We retain some personal data for a longer period. For example, if you are an employee of the Charity, we retain your data after you leave or otherwise finish your employment with us for example where same are required for employment references, or pension purposes etc).
  - **Archival retention periods:** Some data we retain indefinitely due to its enduring historical value (eg. information that will have enduring historical value for archival purposes). For example, if a benefactor remembers us in their Will, we will keep a copy of the solicitor's letter (and any correspondence with the estate) in our active accounting system for accounting and audit purposes in line with our legal obligations as a registered charity; after that, we transfer the correspondence to our archives. We believe that

benefactors' Bequests are documents of enduring historical value and we retain that to honour the testator's memory and to acknowledge the meaningful contribution they have made to the work of the monastery. The monastery's archives are not currently open to the public.

4. **Who we share it with:** We share personal data with third parties, including where required to comply with our legal obligations (including complying with court orders, discovery orders, etc). Where required, we will share your personal data with our insurance company, our legal advisors, and other service providers (including auditors, payroll providers, IT providers, security providers, etc) to enforce our legal rights (for fraud prevention, credit risk, litigation) and to resolve disputes and defend litigation.
- 4.1. **Benefactors:** We share benefactors' personal data with third parties, for example with the Revenue Commissioners to claim the tax-back on any charitable donations where applicable (CHY3 and CHY4 forms), with payment service providers, with our banks (to process any cheques). After completion of the payment, the documentation is retained and shared with our Auditors for audit and verification purposes (in compliance with our financial audit requirements as a registered charity). Our financial records and donations information are disclosed to the Charities Section of the Revenue Commissioners and/or the Charities Regulatory Authority in any audits and/or investigations. If you give us your consent to the use of your photograph for upload to our social media account (eg Facebook) the photograph is subject to the privacy policy of that social media company. Where necessary for security, fraud-prevention, cyber-security, and where same is in our legitimate interests, we will report relevant matters to and share data with An Garda Síochána and other police and law enforcement authorities.
- 4.2. **Sisters:** We share Sisters' personal data with third parties including Colleges/educational institutions which our Sisters are attending as part of formation, discernment, vocations, sabbaticals etc. Sisters' data may be disclosed to the Charity's auditors in compliance with our financial audit requirements as a registered charity.
  - **Vocations data:** During the vocations process, records will be processed regarding the discernment process and the applicant's suitability for admission to the unique life of a cloistered Carmelite community. This process may be repeated during a Sister's lifetime. Personal data relating to the Candidate will be shared with external psychotherapists/ counsellors/psychiatrists/psychologists (and vice versa) in order for the Prioress to obtain a psychological assessment about a Candidate. This assessment is used to determine whether a Candidate is suitable for life in the Carmelite community. In respect of existing Sisters, the assessment is used to assess medical/clinical needs, and in appropriate cases is used to assess and whether an existing Sister is suitable to continue life in community.
  - **Medical data:** If a Sister is in need of medical or social care, her personal data will be shared with the Sister's GP, Doctors, clinical care team (including occupational therapists, speech therapists, physical therapists), other Hospitals and care facilities, the HSE, the National Treatment Purchase Fund, Fair Deal, and with other bodies who may be in a position to assist in meeting the person's care needs. If a Sister's needs cannot be met within community and she requires nursing home care, the Sister's personal data (including all medical data) will be shared with the nursing home to ensure her medical and personal care needs can be met with dignity. We may also share Sisters' personal data with their close family/next-of-kin if the person consents for us to do so, or in case of an emergency.

- **Safeguarding data:** In respect of any safeguarding information relating to Sisters/former members, we share data with TUSLA (pursuant to the HSE Policy on Safeguarding of Vulnerable Adults and Children First Act 2015), An Garda Síochána, medical professionals and clinical bodies, and other Church bodies including the National Board for Safeguarding Children in the Catholic Church in Ireland
- **Vetting data:** Vetting applications for Sisters (and any staff if relevant) are processed via AMRI (the Association of Leaders of Missionaries and Religious of Ireland). AMRI is registered with the National Vetting Bureau for the purposes of sections 9 and 13(4) Vetting Act. AMRI is the Monastery's data processor for the vetting process. Sisters (and staff, if relevant) who are legally required to undertake vetting are required to complete the relevant form (NVB1) accurately and provide the supporting identification documents. The Monastery submits the completed documentation to AMRI. AMRI then submits the vetting information to NVB and liaises with NVB to ensure the vetting outcome is returned to the monastery. Further information is made available at the time vetting is being undertaken.

4.3. **Employees:** We share employees' data with third parties where there is a lawful basis for us to do so. For example:

- **Auditors, statutory inspections etc.** For example, employees' data may be disclosed to the Charity's auditors in compliance with our financial audit requirements as a registered charity. If the Workplace Relations Commission conducts a workplace inspection, the employees' records will be opened to them to confirm compliance with all relevant employment laws.
- **Payroll and pensions: we share employees' data with** banks/financial institutions (to pay wages); pension administrators and pension trustees (re the occupational pension scheme).
- **Future employers:** If the employee (or a former employee) requests a service reference, we will share his/her personal data with any future employers.
- **Government/public bodies:** We also share employees' data with Government bodies including Revenue Commissioners, Department of Social Protection, TUSLA, An Garda Síochána, and the HSE; any professional and/or regulatory body to which the employee belongs, and in such circumstances those bodies to whom we transfer your personal data will use it for their own purposes (including: to verify other information they already hold about you, for fraud prevention measures, etc) and may aggregate it with other information they already hold about you.
- **IR/HR, claims and legal claims:** We will share an employee's data with his/her trade union if required for employment rights, IR/HR issues etc. We also share employees' data with our insurance company (re any claims and/or insurable events); other service providers (including auditors, IT providers, security providers, legal advisors) etc.
- **Occupational health:** If any issues/concerns arise with regard to the employee's occupational health or welfare, a referral will be made to the employer's occupational health specialists. The employee's personal data (including special categories of personal data such as medical information, sick leave certificates, absence records etc) will be released to the employer's occupational health specialists. This is to safeguard the employee's health and well-being for the purposes of the employer complying with section 8 Safety, Health and Welfare at Work Act 2005, and although the employee may be notified, his/her consent will not be sought. Reports will be issued by the occupational health specialist directly to the employer (without seeking the employee's consent) as the

lawful basis of this disclosure is not consent as the processing is necessary for the purposes of carrying out the **legal obligations of the controller in the field of employment law**, and for the purposes of **preventive or occupational medicine, for the assessment of the working capacity of the employee** and for the **establishment, exercise or defence of legal claims**.

5. **Third country transfers:** In general, the Charity does not transfer personal data outside the EEA.
6. **Automated Decision Making/Profiling:** The Charity does not engage in any automated decision making or profiling.
7. **Your rights:** You have the following statutory rights that can be exercised at any time subject to the limitations and exceptions set out in GDPR and the Data Protection Act 2018. You can exercise these by contacting us, and providing us with proof of identity and the detail of your request:
  - Right to complain to supervisory authority. Their contact details are set out below:

<b>Telephone:</b>	+353 57 8684800 +353 (0)761 104 800
<b>E-mail:</b>	info@dataprotection.ie
<b>Postal Address:</b>	Data Protection Commission, 12 Fitzwilliam Square South, Dublin 2, D02 RD28
  - Right of access.
  - Right to rectification.
  - Right to erasure (right to be forgotten).
  - Right to restrict processing.
  - Right to data portability.
  - Right to object.
  - Right not to be subjected to automated decision making/profiling.
- 7.8. **Contact us:** If you have any queries, please contact us at: [carmel@roebuckcarmel.com](mailto:carmel@roebuckcarmel.com) (01) 288 4732 or Carmelite Monastery, Roebuck Road Dublin 14. D14 T1H9.