

Enniscorthy Christian Fellowship

Data Protection Policy

Introduction

The purpose of this document is to provide a concise policy statement regarding the Data Protection obligations of Enniscorthy Christian Fellowship. This includes obligations in dealing with personal data, in order to ensure that Enniscorthy Christian Fellowship complies with the requirements of the relevant Irish legislation, namely the Irish Data Protection Act (1988), the Irish Data Protection (Amendment) Act (2003) and the General Data Protection Requirements regulations (25th May 2018).

Rationale

Enniscorthy Christian Fellowship will comply with the Data Protection principles set out in the relevant legislation. This policy applies to all Personal Data collected, processed and stored by Enniscorthy Christian Fellowship in relation to its church members, volunteers and service providers and in the course of all its activities. Enniscorthy Christian Fellowship makes no distinction between the rights of Data subjects who are employees, volunteers members and those who are not. All are treated equally under this policy.

Scope

The policy covers both personal and sensitive personal data held in relation to data subjects by Enniscorthy Christian Fellowship. The policy applies equally to personal data held in manual and automated form.

All Personal and Sensitive Personal Data will be treated with equal care by Enniscorthy Christian Fellowship. Both categories will be equally referred-to as Personal Data in this policy, unless specifically stated otherwise.

Enniscorthy Christian Fellowship as a Data Controller

In the course of its activities, Enniscorthy Christian Fellowship may acquire, process and store personal data in relation to:

- Members of Enniscorthy Christian Fellowship
- Volunteers in Enniscorthy Christian Fellowship
- Visitors to Enniscorthy Christian Fellowship activities
- Members' children and visiting children
- Third party service providers engaged by or in Enniscorthy Christian Fellowship

In accordance with the Irish Data Protection legislation, this data must be acquired and managed fairly. Not all members will be expected to be experts in Data Protection legislation. However, Enniscorthy Christian Fellowship is committed to ensuring that its members has sufficient awareness of the legislation in order to be able to anticipate and identify a Data Protection issue, should one arise. In such circumstances, Enniscorthy Christian Fellowship members must ensure that the Data Protection Officer is informed, and in order that appropriate corrective action is taken.

This policy provides the guidelines for this exchange of information.

In general terms, the staff member should consult with the Data Protection Officer to seek clarification.

Subject Access Requests

Any formal, written request by a Data Subject for a copy of their personal data (a Subject Access Request) will be referred, as soon as possible, to the Data Protection Officer, and will be processed as soon as possible.

It is intended that by complying with these guidelines, Enniscorthy Christian Fellowship will adhere to best practice regarding the applicable Data Protection legislation.

The Data Protection Principles

The following key principles are enshrined in the Irish legislation and are fundamental to Enniscorthy Christian Fellowship's Data Protection policy.

In its capacity as Data Controller, Enniscorthy Christian Fellowship ensures that all data shall:

1. ... be obtained and processed fairly and lawfully.

For data to be obtained fairly, the data subject will, at the time the data are being collected, be made aware of:

- The identity of the Data Controller (Enniscorthy Christian Fellowship)
- The purpose(s) for which the data is being collected
- The person(s) to whom the data may be disclosed by the Data Controller
- Any other information that is necessary so that the processing may be fair.

Enniscorthy Christian Fellowship will meet this obligation in the following way.

- Where possible, the informed consent of the Data Subject will be sought before their data is processed;
- Where it is not possible to seek consent, Enniscorthy Christian Fellowship will ensure that collection of the data is justified under one of the other lawful processing conditions – legal obligation, contractual necessity, etc.;
- Where Enniscorthy Christian Fellowship intends to record activity on CCTV or video, a Fair Processing Notice will be posted in full view;
- Processing of the personal data will be carried out only as part of Enniscorthy Christian Fellowship lawful activities, and Enniscorthy Christian Fellowship will safeguard the rights and freedoms of the Data Subject;
- The Data Subject's data will not be disclosed to a third party other than to a party contracted to Enniscorthy Christian Fellowship and operating on its behalf.

2. be obtained only for one or more specified, legitimate purposes.

Enniscorthy Christian Fellowship will obtain data for purposes which are specific, lawful and clearly stated. A Data Subject will have the right to question the purpose(s) for which Enniscorthy Christian Fellowship holds their data, and Enniscorthy Christian Fellowship will be able to clearly state that purpose or purposes.

3. not be further processed in a manner incompatible with the specified purpose(s).

Any use of the data by Enniscorthy Christian Fellowship will be compatible with the purposes for which the data was acquired.

4. be kept safe and secure.

Enniscorthy Christian Fellowship will employ high standards of security in order to protect the personal data under its care. Appropriate security measures will be taken to protect against unauthorised access to, or alteration, destruction or disclosure of any personal data held by Enniscorthy Christian Fellowship in its capacity as Data Controller.

Access to members', volunteers' and attendees' records are limited to those staff members who have appropriate authorisation and password access.

5. ... be kept accurate, complete and up-to-date where necessary.

Enniscorthy Christian Fellowship will:

- conduct periodic reviews and audits to ensure that relevant data is kept accurate and up-to-date.
- conduct regular assessments in order to establish the need to keep certain Personal Data.

6. ... be adequate, relevant and not excessive in relation to the purpose(s) for which the data were collected and processed.

Enniscorthy Christian Fellowship will ensure that the data it processes in relation to Data Subjects are relevant to the purposes for which those data are collected. Data which are not relevant to such processing will not be acquired or maintained.

7. ... not be kept for longer than is necessary to satisfy the specified purpose(s).

Once the respective retention period has elapsed, Enniscorthy Christian Fellowship undertakes to destroy, erase or otherwise put this data beyond use.

8. ... be managed and stored in such a manner that, in the event a Data Subject submits a valid Subject Access Request seeking a copy of their Personal Data, this data can be readily retrieved and provided to them.

Enniscorthy Christian Fellowship has implemented a Subject Access Request procedure by which to manage such requests in an efficient and timely manner, within the timelines stipulated in the legislation.

Data Subject Access Requests

As part of the day-to-day operation of Enniscorthy Christian Fellowship members /volunteers may engage in exchanges of information with Data Subjects. Where a formal request is submitted by a Data Subject in relation to the data held by Enniscorthy Christian Fellowship such a request gives rise to access rights in favour of the Data Subject.

Enniscorthy Christian Fellowship will ensure that, where necessary, such requests are forwarded to the Data Protection Officer in a timely manner, and they are processed as quickly and efficiently as possible, but within not more than 30 days from receipt of the request.

Implementation

As a Data Controller, Enniscorthy Christian Fellowship ensures that any entity which processes Personal Data on its behalf (a Data Processor) does so in a manner compliant with the Data Protection legislation.

Definitions

For the avoidance of doubt, and for consistency in terminology, the following definitions will 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, information in relation to commission of a crime and information relating to conviction for a criminal offence.
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.
Data Protection Officer	A person appointed by Enniscorthy Christian Fellowship to monitor compliance with the appropriate Data Protection legislation, to deal with Subject Access Requests, and to respond to Data Protection queries from staff members and service recipients.
Relevant Filing System	Any set of information in relation to living individuals which is not processed by means of equipment operating automatically (computers), and that is structured, either by reference to individuals, or by reference to criteria relating to individuals, in such a manner that specific information relating to an individual is readily retrievable.
