NYMO Privacy Notice and Cookies Information

Privacy Notice And Cookies Information

PRIVACY NOTICE FOR NYMO as part of THE ROMAN CATHOLIC DIOCESE OF NORTHAMPTON

1 INTRODUCTION

1.1 The Diocese of Northampton (the "Diocese") is a charity registered with the Charity Commission in England and Wales. Our charity number is 234091, and our registered address is Bishop's House, Marriott Street, Northampton NN2 6AW.

The youth ministry office within the Mission Northampton department of the Northampton Diocese is called the Northampton Youth Ministry Office or NYMO
("NYMO") It serves Catholic secondary schools and Catholic churches within the traditional counties of Northamptonshire, Bedfordshire and Buckinghamshire, and some areas of Slough, a Unitary Authority within Berkshire.

Our contact details are as follows:

NYMO

Holy Ghost Parish Centre

33 Westbourne Road

Luton, Bedfordshire LU4 8JD

NYMO.admin@northamptondiocese.com

In this Notice, references to 'we' and 'us' mean the Northampton Youth Ministry Office, which is not a separate Charity or legal entity but part of the Northampton Diocese.

1.2 When you provide us with Personal Data in order to engage with us and/or benefit from our services, we will keep a record of the data you give to us in order to enable us to comply with our statutory obligations and to achieve the Diocese's charitable objects of advancing and maintaining the Roman Catholic religion through the operation of our youth ministry office.

1.3 For the purpose of the General Data Protection Regulation 2016/279 (GDPR), and the Data Protection Act 2018, (together called the "Data Protection Rules") the Diocese, through its Trustees, will be a Data Controller in respect of your Personal Data. In some cases, the Diocese may be a joint Data Controller of your Personal Data (e.g. where your data is shared between the Diocese and another organisation for a particular purpose, such as tax reclaims). Please be aware that parishes and departments, including NYMO, form part of the Diocese and are not separate legal entities. NYMO is not a Data Controller, but does process some Personal Data on behalf of the Diocese as a Data Processor (see Glossary at end).

1.4 Everyone has rights with regard to how their Personal Data is handled by organisations. The Diocese is committed to ensuring that Personal Data is properly and securely managed in accordance with the relevant Data Protection Rules, and believes this is an important part of achieving trust and confidence between the Diocese and those with whom it interacts. Please read this Notice to understand how we use and protect the information that you provide to us or that we obtain or hold about you, and to understand what your rights are in relation to information that we hold. This Notice applies to information about living identifiable individuals only.

2 WHAT PERSONAL DATA DO WE HOLD ABOUT YOU?

2.1 We may hold the following types of Personal Data – though it will be rare for us to hold all these types of data about any individual:

2.1.1 Name, address and contact details;

2.1.2 Gender, age, date of birth, marital status and nationality;

2.1.3 Information about your family and any dependants;

2.1.4 Information about your current involvement in Diocese activities and events (e.g. booking details for events you are attending);

2.1.5 Financial information (e.g. bank details) and details of any donations you have made to us in the past;

2.1.6 Information obtained as a result of any background checks on staff and volunteers;

2.1.7 Video recordings and photographs;

2.1.8 Medical and psychological information (for event attendees);

2.1.9 Dietary and health information necessary for events, residentials and trips; and

2.1.10 Any other information which you choose to provide to us.

2.2 Some of the data we hold will constitute “Special Categories of Personal Data” (e.g. information about your religious beliefs, information about your health and wellbeing, and, rarely, information revealing racial or ethnic origins, and sexual orientation, or, in the case of background checks, information about criminal records or proceedings).

2.3 We may also receive Personal Data about you from third parties, for example, your family members, other parishioners, other dioceses, medical professionals, the police and other law enforcement bodies.

3 HOW AND WHY DO WE PROCESS YOUR PERSONAL DATA?

3.1 The Personal Data which we hold about you, whether it is collected directly from you or whether we receive it from a third party, may be used (“processed”) in a number of ways, for example:

3.1.1 to communicate with you in relation to our activities, services and events, including seeking feedback and informing you of any changes to our services;

3.1.2 to carry out the services that we offer;

3.1.3 to process donations that you may make to us, or other payments where, for example, you pay for attendance at one of our events;

3.1.4 to administer, support, improve and develop the administration of our work and operations and to keep our accounts and records up-to-date;

3.1.5 to process applications from you, including grant applications, and applications for volunteer roles;

3.1.6 for audit and statistical purposes (e.g. for the annual audit undertaken by the Bishops’ Conference of England and Wales);

3.1.7 to ensure we comply with our legal obligations (e.g. by providing information to the Charity Commission or carrying out safeguarding activities);

3.1.8 in the case of video recordings, and photographs, to market, report on, and advertise our events. Written consent and permission will always be sought prior to photos or videos being taken or used; and

3.1.9 for users that register on our website (if any), we store the personal information they provide in their user profile. All users can see, edit, or delete their personal information at any time (except they cannot change their username). Website administrators can also see and edit that information.

4 ON WHAT LEGAL GROUNDS DO WE PROCESS YOUR PERSONAL DATA?

4.1 Under the Data Protection Rules we must have a lawful basis for processing your information; this will vary according to the circumstances of how and why we have your information but typical examples include:

4.1.1 the activities are within our legitimate interests in advancing and maintaining the Roman Catholic religion, including all normal Diocesan and parish activities, and in ensuring the flow of charitable funds for these purposes;

4.1.2 you may have given consent (which can be withdrawn at any time by contacting us using the details above) for us to process your information (e.g. to send you communications by email or text);

4.1.3 we are carrying out necessary steps in relation to ensuring the safety of the minors we work with (e.g. collecting event attendees personal and medical information and sharing it with necessary event leaders and first aiders);

4.1.4 the Processing is necessary for compliance with a legal obligation (e.g. where we pass on information to a local authority for safeguarding or other reasons, or carry out background checks for our volunteers);

4.1.5 to protect your vital interests (e.g. if you were unfortunate enough to fall ill or suffer an injury on our premises, then we may pass on information to the NHS for treatment purposes and to family members).

4.2 If we Process any Special Categories of Personal Data we must have a further lawful basis for the processing. This may include:

4.2.1 where you have given us your explicit consent to do so (e.g. to cater for your medical or dietary needs at an event);

4.2.2 where the Processing is necessary to protect your vital interests or someone else's vital interests (e.g. passing on information to the Police);

4.2.3 where the Processing is carried out in the course of our legitimate interests as a Roman Catholic Diocese, working with and supporting our current and former parishioners, and the information is not shared outside the Diocese other than with your consent (e.g. carrying out a youth ministry within parishes censuses);

4.2.4 you have made the information public (e.g. by disclosing personal details and beliefs in public media, or consenting to your details appearing in a public Directory)

4.2.5 where the Processing is necessary for the establishment, exercise or defence of legal claims;

4.2.6 where the Processing is necessary for carrying out the Diocese's employment and social security obligations; or

4.2.7 the processing being necessary for reasons of substantial public interest (e.g. where steps are taken to prevent fraud or other dishonest activity);

4.2.8 Where the processing is necessary for archiving historical records (at Diocesan level)

4.2.9 Where it is in the substantial public interest, and necessary for the safeguarding of children or vulnerable adults.

Always provided that the legal basis is proportionate to the aim pursued and provides for suitable and specific measures to safeguard your rights, or as part of our legitimate interests as a Roman Catholic

diocese and charitable institution.

5 WHO WILL WE SHARE YOUR INFORMATION WITH?

5.1 We will only use your Personal Data within the Diocese for the purposes for which it was obtained, unless you have explicitly agreed that we may share your Personal Data with another organisation or unless we are otherwise permitted or required to under the Data Protection Rules or order of a Court or other competent regulatory body or as set out in this Notice.

5.2 We may share your information with government bodies for tax-reclaiming purposes or law enforcement agencies for the prevention and detection of crime.

5.3 Sometimes the Diocese contracts with third parties whom we ask to process Personal Data on our behalf (e.g. payroll agencies, IT consultants, distributors of newspapers and directories). We require these third parties to comply strictly with the Diocese's instructions and with GDPR.

5.4 The Diocese has in place administrative, technical and physical measures designed to guard against and minimise the risk of loss, misuse or unauthorised processing or disclosure of the Personal Data that we hold, which we also adhere to.

5.6 In the course of Processing your Personal Data, or disclosing it to the recipients referred to above, the Diocese may have to transfer it to countries which are outside the European Economic Area (EEA) (e.g. to the Vatican), some of which may not have laws which provide the same level of protection to your Personal Data as laws inside the EEA. In such cases the Diocese will take steps to ensure that the transfers comply with GDPR and that your Personal Data is appropriately protected. The Diocese does so by requiring them to satisfy them that they have a code of conduct affording an adequate degree of protection for your data, approved by a competent national or international supervisory authority.

5.7 When visitors leave comments on the site, we collect the data shown in the comments form, and the visitor's IP address and browser user agent string to help spam detection. An anonymised string created from your email address (also called a hash) may be provided to the Gravatar service to see if you are using it. The Gravatar service privacy policy is available here: https://automattic.com/privacy/. After approval of your comment, your profile picture is visible to the public in the context of your comment. Your profile picture can be edited or removed from the profile editing in your account page.

5.8 Articles on this site may include embedded content (e.g. videos, images, articles, etc.). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website. These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that website.

6 HOW LONG WILL WE KEEP YOUR INFORMATION FOR?

6.1 Your information will be kept in accordance with the Diocese's Retention & Disposal of Records Policy (available on the Diocese's website) In any event, we will endeavour to only keep Personal Data for as long as is necessary and to delete it when it is no longer so.

6.2 If you leave a comment, the comment and its metadata are retained indefinitely. This is so we can recognise and approve any follow-up comments automatically instead of holding them in a moderation queue.

7 COOKIES

7.1 Cookies, also known as browser or tracking cookies, are small text files that are added to your computer when you visit a website. They help websites to perform certain functions e.g. to recognise your ID if you log into a restricted part of a website, to record your preferences when using websites, to pre-complete info in facilities like “shopping carts”, and for web-browsing-behaviour tracking purposes. They do NOT capture any data identifying you personally, except, if you choose, for forms or purchase completion.

7.2 If you leave a comment on our site, you may opt-in to saving your name, email address and website in cookies. These are for your convenience so that you do not have to fill in your details again when you leave another comment. These cookies will last for one year.

7.3 If you have an account and you log in to this site, we will set a temporary cookie to determine if your browser accepts cookies. This cookie contains no personal data and is discarded when you close your browser.

When you log in, we will also set up several cookies to save your login information and your screen display choices. Login cookies last for two days, and screen options cookies last for a year. If you select “Remember Me”, your login will persist for two weeks. If you log out of your account, the login cookies will be removed.

7.4 If you edit or publish an article, an additional cookie will be saved in your browser. This cookie includes no personal data and simply indicates the post ID of the article you just edited. It expires after 1 day.

7.5 If you would like to opt-in or opt-out of using cookies then you should be able to do so using your browser, or the pop-up notification. You can review your cookie settings at any time.

8 ANALYTICS

8.1 The Diocese only uses Google analytics cookies on the website for tracking purposes. The cookies allow us to understand general traffic to our website, for example, number of visitors and length of time on site. This process does collect data, but in an anonymous form, to help us make improvements, develop the website and enhance the user experience.

9 Media

If you upload images to the website, you should avoid uploading images with embedded location data (EXIF GPS) included. Visitors to the website can download and extract any location data from images on the website.

10 YOUR RIGHTS

10.1 You have rights in respect of the Personal Data you provide to us. In particular:

10.1.1 the right to request a copy of some or all of the Personal Data that we hold about you (including, in some cases, in a commonly used, machine readable, format so that it can be transferred to other Data Controllers). If you have an account on this site, or have left comments, you can request to receive an exported file of the personal data we hold about you, including any data you have provided to us.

We do not make a charge for this service; but a request needs to be made in writing, which can include e-mail or other media;

10.1.2 if we Process your Personal Data on the basis that we have your consent, the right to withdraw that consent;

10.1.3 the right to ask that any inaccuracies in your Personal Data are corrected;

10.1.4 the right to have us restrict the Processing of all or part of your Personal Data;

10.1.5 the right to ask that we delete your Personal Data where there is no compelling reason for us to continue to Process It (erasure or “the right to be forgotten”). This does not include the removal of factual records in baptismal registers, though they may be annotated;

10.1.6 the right to object to us Processing your Personal Data for direct marketing purposes e.g. in relation to fundraising carried out by the Diocese or advertising our events.

10.2 Please note that the above rights may be limited in some situations – for example, where we can demonstrate that we have a legal requirement to Process your Personal Data. Also, we may need you to provide us with proof of identity for verification and data security purposes before you can exercise your rights.

10.3 Please also note that parents / guardians / family members do not have a right to see information about their children or other family members (or any other third parties) and rights may only be exercised by an individual (including children from 12 years upwards) or with their express permission.

11 CHANGES TO THIS NOTICE

We may make changes to this Notice from time to time as our organisational practices and/or applicable laws change. We will not make any use of your personal information that is inconsistent with the original purpose(s) for which it was collected or obtained (if we intend to do so, we will notify you in advance wherever possible) or otherwise than is permitted by the Data Protection Rules.

12 CONTACT DETAILS

12.1 If you have any questions, require further information about how we protect your Personal Data, if you wish to exercise any of the above rights or if you would like to provide feedback or make a complaint about the use of your information, please contact the Diocesan Data Protection Manager (details below).

Any queries regarding this Policy should be addressed to the Diocesan Data Protection Manager at the following address:

The Data Protection Manager, c/o Bishops House, Marriott Street, Northampton NN2 6AW

12.2 Any complaints will be dealt with in accordance with the Diocese's usual Complaints procedure.

12.3 We hope that we can satisfy any queries you may have about the way in which we Process your Personal Data. However, if you have unresolved concerns, you also have the right to complain to the Information Commissioner ('ICO') (www.ico.org.uk). \

13 GLOSSARY

"Data Controller" means a person, organisation or body that determines the purposes for which, and the manner by which, any Personal Data is processed. A Data Controller is responsible for complying with the Data Protection Rules and establishing practices and policies in line with them.

"Data Processor" means any person, organisation or body that Processes personal data on behalf of and on the instruction of the Diocese. Data Processors have a duty to protect the information they process by following the Data Protection Rules.

"Data Subject" means a living individual about whom the Diocese processes Personal Data and who can be identified from the Personal Data. A Data Subject need not be a UK national or resident. All Data Subjects have legal rights in relation to their Personal Data and the information that the Diocese holds about them.

"EEA" is the European Economic Area, consisting of the countries of Austria, Belgium, Bulgaria, Czech Republic, Cyprus, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Ireland, Italy, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, United Kingdom. (Countries in bold are non-EU members. Switzerland is in neither, nor is the Vatican City.)

"Personal Data" means any information relating to a living individual who can be identified from that information or in conjunction with other information which is in, or is likely to come into, the Diocese's possession. Personal Data can be factual (such as a name, address or date of birth) or it can be an opinion (e.g. a performance appraisal). It can even include a simple email address. A mere mention of someone's name in a document does not necessarily constitute Personal Data, but personal details such as someone's contact details or salary (if it enabled an individual to be identified) would fall within the definition.

"Processing" means any activity that involves use of Personal Data. It includes obtaining, recording or holding the information or carrying out any operation or set of operations on it, including organising,

amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring or disclosing Personal Data to third parties.

“Special Categories of Personal Data” (previously called sensitive personal data) means information about a person’s racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health or condition or sexuality. It also includes genetic and biometric data. Special Categories of Personal Data can only be processed under strict conditions, and such processing will usually, although not always, require the explicit consent of the Data Subject.

“Data Breach” – A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes. It also means that a breach is more than just about losing personal data. It can be broadly defined as a security incident that has affected the confidentiality, integrity or availability of personal data. In short, there will be a personal data breach whenever any personal data is lost, destroyed, corrupted or disclosed; if someone accesses the data or passes it on without proper authorisation; or if the data is made unavailable, for example, when it has been encrypted by ransomware, or accidentally lost or destroyed.

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For more information on this policy please contact the NYMO team at:
NYMO.admin@northamptondiocese.com

THE CATHOLIC DIOCESE
OF NORTHAMPTON