DATA PROTECTION POLICY

- Charity Name: ZION PARISH
- Date Adopted: 28th May 2026
- Minute Reference: Rector's Business

1. Introduction

We, Zion Parish, are committed to protecting the privacy rights of individuals in relation to the processing of their personal data and confer rights on individuals as well as responsibilities on those processing personal data. This policy outlines our approach to compliance with the General Data Protection Regulation (GDPR), the Data Protection Acts 1988 – 2018 (ROI) OR 1998 – 2018 (NI) and all other relevant data protection legislation. This policy is effective as and from Enter date

Comment [RF1]: I don't know how you'd like to keep it - could Parishes edit according to their jurisdiction?

1.2 The scope of this policy

This policy applies to all personal data created or received in the course of our work in all formats, across all time periods. This may be in paper, physical and electronic formats or communicated verbally in conversation or over the telephone. It applies to all locations where personal data is held by the parish and its data processors.

1.3 Roles & responsibilities

The parish is a data controller. The parish commits to acting in a transparent manner and is responsible for determining the purposes and means of all data processing undertaken by and on behalf of:

- The Clergy
- Select Vestry, as charity trustees
- General Vestry
- Members of the Parish
- Employees, Contractors and volunteers

Name of person is responsible for answering questions in relation to this data protection policy and the parish's approach to privacy. For any questions about this policy, including any request to exercise legal rights, please contact: Click here to enter text.

2. Definitions of Personal Data

Personal data is any information that can identify an individual either directly or indirectly in conjunction with other information. This includes a name, location data or a postal address, online browsing history, images or anything relating to the physical, physiological, genetic, mental, economic, cultural or social identity of a person.

Special categories of data can only be processed under specific circumstances and appropriate safeguards must be in place to protect this data. Special categories include racial or ethnic origin, political opinion, religious or philosophical beliefs, sexual orientation or information concerning a person's sexual nature and information about children.

The parish may collect, use, store and transfer different kinds of personal information and use it for a variety of different purposes. This includes:

Type of personal information may include (And is not limited to)	**Legal basis for processing** (Full explanation in Section 4)
Contact Information including name, address, email and telephone number	Consent Limited personal information may be processed in the legitimate interest of the Parish
Family information including marital and family status	Consent
Financial information including bank details and NIN / PPSN numbers	Compliance with our legal obligations
Information required for Safeguarding Trust / Garda Vetting	Compliance with our legal obligations
Photographs and video images which may be shared on social media, the website and other forums	Consent
Information processed during the live streaming of Church Services	Consent
Images captured via use of CCTV	Following a risk assessment, data is processed in the public interest

3. Data Protection Principles

The parish is responsible for complying with the following principles. Personal data should be:

- Processed lawfully, fairly and in a transparent manner
- Collected for specified, explicit and legitimate purposes only
- Adequate, relevant and limited to what is necessary
- Accurate and, where necessary, kept up to date
- Kept in a form which enables identification of data subjects for no longer than is necessary
- Kept safe and processed in a manner that ensures appropriate security of the personal data

4. Lawfulness of processing

As illustrated in the table above, the parish collects and uses personal information for several purposes and relies on a number of different legal bases to do this.

4.1 To enter into and perform a contract

The parish uses personal information to carry out our obligations arising from any contracts entered into between two parties or to take the necessary steps prior to entering into a contract including:

- To administer employment, financial or legal contracts
- To pay for the services professionally provided to us

- To provide other services as they arise

4.2 To comply with our legal obligations

The parish is required to process personal information to comply with certain legal obligations which they are subject to including:

- Providing information to An Garda Siochana/PSNI, the Revenue Commissioners/HMRC and other Government bodies or agencies when required to do so by law
- To verify personal information and to meet legal and compliance obligations
- To carry out a statutory audit
- Where a person has exercised one of their data rights, we will retain a copy of all correspondence to demonstrate our compliance with data protection legislation
- Where a person has exercised one of their data rights and asked us not to contact them by email at a particular email address, for example, we will need to retain a copy of that email address in order to comply with the no-contact request

4.3 For legitimate business interests

Where the parish processes personal information for our legitimate interests, the parish will ensure that there is a fair balance between their legitimate interest and the data subject's fundamental rights and freedoms.

- The parish may use personal information to manage the day to day running of the parish, including accounting, internal reporting needs, to ensure appropriate IT security and to prevent fraud, in our legitimate interest. Our legitimate interest is the effective management of the administrative functions of the parish.
- The parish may use personal information to communicate with a data subject, to update them on developments within the parish, diocese or wider Church of Ireland and invite data subjects to events that we feel may be of interest to them. Our legitimate interest is to connect with and update data subjects on services provided by the parish.
- The parish may process personal information, which includes the processing of special categories of personal data, where processing is carried out in the course of their legitimate activities on condition that the processing relates solely to data subjects who are members, former members or whom have previously been involved with the parish or are an employee and/or contracted staff member.
- The parish may use personal information to contact people who are in regular contact with them in connection with their purposes.
- The legitimate interests of the parish do not override a data subject's interest. A data subject has the right, free of charge, to object to the parish using their personal information for legitimate interests. Objections should be made to Click here to enter text – include the name of the person as outlined in Section 1.3 of this policy .

4.4 For the establishment, exercise or defence of legal claims

The parish occasionally processes personal information, including sensitive personal information, such as information concerning health, religious or philosophical beliefs, political opinion and criminal convictions / offences where it is necessary for the establishment, exercise or defence of legal claims.

4.5 Consent

- The parish will, in certain circumstances, rely on explicit consent to process personal data, including sensitive personal data. Where we do, the data subject has the right to withdraw their consent at any time by Click here to enter text – include the name of the person as outlined in Section 1.3 of this policy

4.6 Vital Interest

The parish may, in certain circumstances, use personal data where the processing is necessary to protect someone's life.

4.7 Public Interest

- The parish may, in certain circumstances, use personal data for the performance of a task carried out in the public interest. Click here to enter text if CCTV is used. Leave blank if CCTV is not used by the parish. If you use CCTV, include a statement suitable for your parish, along the lines of: 'CCTV is in operation at the **Parish Hall** and the **Rectory**. CCTV notices are on display outside the premise to inform individuals that CCTV is in operation and give advance notice of any recordings"

5. Rights of data subjects

Data subjects have a number of rights under data protection law in relation to how the parish use their personal information. They have the right, free of charge, to:

- Request a copy of the personal information the parish hold on the data subject in a structured, commonly used and machine-readable format
- Rectify any inaccurate personal information the parish hold about the data subject
- Withdraw their consent where the parish has relied upon consent to process their information
- Request that the parish erase the personal information held about the data subject to certain exceptions
- If technically feasible, request to have their personal information transmitted to another data controller in a machine-readable format
- Restrict processing of their personal information in certain circumstances
- Object to the parish's use of their personal information for our legitimate interests
- Not be subject to a decision which is based solely on automated processing where the decision significantly affects the data subject. The parish does not make automated decisions of this nature

- Lodge a complaint with the appropriate data protection authority if the data subject has any concerns about how we process their personal data

These rights are, in some circumstances, limited by data protection legislation. If a data subject wishes to exercise any of these rights, please contact Click here to enter text – include the name of the person as outlined in Section 1.3 of this policy . The parish will take measures to verify the identity of the data subject, which will be by reference to copies of acceptable identification documentation. The parish will endeavour to respond to the request within a month. If the parish is unable to deal with the request within a month we may extend this period by a further period of two months and we will provide an explanation for this.

6. Information Technology and Data Protection

The parish is responsible for implementing appropriate technical and organisational measures to demonstrate that processing is performed in accordance with GDPR and relevant Data Protection Acts. Click here to enter text – please include the name any IT policies developed by the parish. They may include IT Password Security; Acceptable Usage, Social Media Usage

7. Data Storage

The parish will retain personal information for as long as needed to fulfil the purposes for which it was collected. The parish will retain and use personal information for no longer than is necessary to comply with accounting, reporting or legal obligations. How long certain information is stored depends on the nature of the information we hold and the purpose for which it is processed Click here to details of where your retention policy is stored OR, if that doesn't apply, that 'The Parish adheres to the Church of Ireland's Retention Policy'. A copy is available on: www.ireland.anglican.org

8. Managing data breaches

A personal data security breach is any event that has the potential to affect the confidentiality, integrity or availability of personal data held by us in any format. The parish is required to report serious data breaches to the Data Protection Commissioner within 72 hours of becoming aware of the data breach.

Where it is determined that the breach is unlikely to result in a risk to the rights and freedoms of natural persons, then the supervisory authority will not be notified. Unless it is determined that there is a high risk to the rights and freedoms of natural persons then the data subject(s) may not be notified.

The parish will keep an internal record of the details, the means for deciding there was no risk, who decided there was no risk and the risk rating that was recorded. The parish will respond promptly and appropriately to data security breaches, including all relevant reporting obligations.

9. When and how personal information is shared

It is important to note that the parish may share personal data between the Church of Ireland's joint data controllers and their respective data processors. **The four data controllers are**: Representative Church Body & General Synod, Diocesan Council, the Bishops and the parish. Examples of how this may occur in practice include the sharing of: Easter general vestry returns / election results; submission of information to facilitate Safeguarding Trust requirements; commissioning and licensing; information regarding confirmation candidates. Clause 4 must also always apply.

9.1 With third parties

The parish may share personal information with third party providers that perform services and functions at their direction and on our behalf, such as accountants, auditors, IT providers, printers, solicitors and providers of security and administrative services. The parish does not sell any personal information and will only share it with third parties who are facilitating the delivery or fulfilment of a service or who are working on behalf of the parish. The parish will contractually require that all suppliers protect such information from unauthorised access, use and disclosure.

10. Transfers outside the European Economic Area

The parish may transfer personal data outside the European Economic Area (EEA). This includes to and from Northern Ireland. Articles 45(3) of the GDPR and Article 36(3) of the Law Enforcement Directive grant the Commission the power to decide, by means of an implementing act, that a non-EU country ensures "an adequate level of protection", i.e., a level of protection for personal data that is essentially equivalent to the level of protection within the EU. The UK has been found "adequate". This means that transfers of personal data from the EU to the UK can take place without being subject to any further conditions.

Where the parish may wish to transfer personal data outside the EEA and an adequacy decision has not been researched, the parish will take specific steps, in accordance with data protection law, to protect personal information.

11. Principles to be followed by data processors

A strong data protection culture is essential to advance the mission and ministry of the Church of Ireland. The parish commit to:

- Understanding their responsibilities in relation to the acquisition, processing and safeguarding of personal data
- Adhering to all Data Protection policies and procedures
- Adhering to the retention guidelines and committing to keeping personal data to a minimum
- Continually assessing the personal data collected and understand any relevant risk associated with this
- Informing the Data Protection Representative of any data subject requests

- Reporting any concerns or risks to the Data Protection Representative particularly if it is suspected that anyone is being asked to act in a way which is contrary to the data protection regulations
- Reporting any data breaches to the Data Protection Representative
- Treating personal information confidentially and ensure it is locked away at the end of the day
- Attending data protection training and refresher events as requested
- Assisting the parish to demonstrate compliance during a data protection audit or inspection

Following the annual General Vestry meeting, all members of the Select Vestry are requested to familiarise themselves with this policy. This policy should be reviewed at 3-year intervals or earlier if deemed appropriate.