

DIVINE RETREAT CENTRE UK - Ramsgate -

St. Augustine's Abbey, Ramsgate, Kent CT11 9PA
Tel: 01843 586 904
Email: info@divineuk.org Website: www.divineuk.org



GDPR & Privacy Policy (General Data Protection Regulation – updated 2023)

INTRODUCTION

Divine retreat centre (DRC) is an organisation which processes personal data and needs to comply with Data Protection requirements. The current legislation that applies to our processing of personal data is the Data Protection Act 2018 (DPA) and the EU General Data Protection Regulation 2016 (GDPR). This notice aims to comply with both the DPA and the GDPR along with guidance issued by the Information Commissioner's Office, and these laws and guidance are together referred to in this policy document as the "Data Protection Legislation".

DATA PROTECTION PRINCIPLES

The Divine retreat centre is committed to processing data in accordance with the six data protection principles set out in the GDPR, which provide that Personal Data must be:

- 1. Processed lawfully, fairly and in a transparent manner in relation to individuals.*
- 2. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.*
- 3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.*
- 4. Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.*
- 5. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.*
- 6. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.*



DIVINE RETREAT CENTRE UK **- Ramsgate -**

St. Augustine's Abbey, Ramsgate, Kent CT11 9PA
Tel: 01843 586 904
Email: info@divineuk.org Website: www.divineuk.org



GDPR

(General Data Protection Regulation – updated 2020)

DATA PROTECTION MANAGER AND REGISTRATION WITH THE ICO

The Data Protection Manager (the DPM) shall be responsible for ensuring day-to-day compliance with this Policy and with the Data Protection Rules. The DPM's name and contact details can be found at the end of this of this Policy.

The DRC is registered with the Information Commissioner's Office (the ICO) as a Data Controller and will remain so at least until the end of 13 May 2018, as is required by law.

This Policy applies to all Personal Data processed by the DRC in whatever format (e.g. paper, electronic, film) and regardless of how it is stored (e.g. electronically or in filing cabinets). It also includes information that is in paper form but is intended to be put into electronic form, and to any recordings made, such as telephone recordings and CCTV.

HOW THE CENTRE WILL COMPLY AND DEMONSTRATE COMPLIANCE

This Policy is intended to ensure that any Processing of Personal Data is in accordance with the Data Protection Rules and the Data Protection principles. The Divine Retreat Centre will therefore:

- Ensure that, when personal information is collected (whether direct from the individual or from a third party), the Data Subject is provided with, or informed how to inspect, a Privacy Notice and informed of what data is being collected and for what legitimate purpose(s).
- Be transparent and fair in processing Personal Data.
- Take steps to ensure the accuracy of data at the point of collection and at regular intervals thereafter, including advising Data Subjects of their right to ask for rectification of Personal Data held about them
- Securely dispose of inaccurate or out-of-date data, or data which is no longer required for the purpose(s) for which it was collected.
- Share information with others only when it is lawful to do so and ensure that individuals are informed of the categories of recipient to whom data will or may be disclosed and the purposes of any such disclosures.
- Ensure that additional safeguards (as required by the Data Protection Rules) are in place to protect Personal Data that is transferred outside of the European Economic Area.



DIVINE RETREAT CENTRE UK - Ramsgate -

St. Augustine's Abbey, Ramsgate, Kent CT11 9PA
Tel: 01843 586 904
Email: info@divineuk.org Website: www.divineuk.org



- Ensure that data is processed in line with the Data Subject's rights, which include the right to:
 1. Request access to Personal Data held about them by the Divine Retreat Centre
 2. Have inaccurate Personal Data rectified.
 3. Have the processing of their Personal Data restricted in certain circumstances
 4. Have Personal Data erased in certain specified situations (in essence where the continued processing of it does not comply with the Data Protection Rules).
 5. Prevent the processing of Personal Data for direct-marketing purposes.
 6. Ask the DRC to prevent Processing of Personal Data which is likely to cause unwarranted or substantial damage or distress to the Data Subject or any other individual.
- Ensure that all clergy, employees and volunteers are aware of and understand the DRC's Data Protection policies and procedures.
- Adopt a Data Retention Schedule which sets out the periods for which different categories of Personal Data will be kept.

Through adherence to this Policy and related Data Protection policies, and through appropriate record-keeping, the Divine Retreat Centre will seek to demonstrate compliance with each of the Data Protection principles.

DATA SECURITY

The Divine Retreat centre will ensure that appropriate technical and organisational security measures are in place to prevent unauthorised or unlawful Processing or damage to or loss (accidental or otherwise), theft, or unauthorised disclosure of Personal Data (a "Data Breach").

In particular, all clergy, employees and volunteers should ensure that:

- *The only individuals who have access to Personal Data and are able to process it are those who are authorised to do so.*
- *Personal Data is stored only on central computer or on secure Cloud-based services and not on individually-owned PCs, portable electronic devices or removable storage media.*
- *Passwords are kept confidential, are changed periodically and are not shared between individuals.*
- *PCs are locked or logged off and paper documents are securely locked away.*
- *Offices, desks and filing cabinets/cupboards are kept locked if they contain Personal Data of any kind, whether in digital or electronic format or on paper.*



DIVINE RETREAT CENTRE UK
- Ramsgate -

St. Augustine's Abbey, Ramsgate, Kent CT11 9PA
 Tel: 01843 586 904
 Email: info@divineuk.org Website: www.divineuk.org



- *When destroying Personal Data, paper documents are securely shredded and electronic data is securely deleted.*

Personal Data removed from an office is subject to appropriate security measures, including keeping paper files in a place where they are not visible or accessible by the public; using passwords/passcodes; encrypting portable electronic devices and storing such devices.

In the event that you become aware that there has been a Data Breach, you must report this immediately to the DPM, following the Data Breach Procedure.

PROCESSING LAWFUL GROUNDS

Divine retreat centre processes personal data on a number of lawful grounds or bases, including:

Lawful Ground for Processing of Personal Data	Examples
Where we have an individual's consent	<i>Posting photographs of an individual on website Sending individuals marketing or fundraising communication by email or text</i>
Where it is necessary for the performance of a contract to which an individual is party	<i>An employment contract or where an individual enters into a hiring agreement</i>
Where it is necessary for compliance with a legal obligation	<i>Passing on information to a local authority, HM Revenue & Customs, or the Charity Commission</i>
Where it is necessary to protect the vital interests of an individual	<i>Passing on information to the Police Passing on information about an individual's serious health condition to the NHS or a health professional where there is a risk of death or serious injury to that person or another individual</i>
Where it is necessary for performance of a task in the public interest	<i>Carrying out safeguarding activities</i>



DIVINE RETREAT CENTRE UK
- Ramsgate -

St. Augustine's Abbey, Ramsgate, Kent CT11 9PA
 Tel: 01843 586 904
 Email: info@divineuk.org Website: www.divineuk.org



The Data Protection Rules require further conditions for processing “Special Category” personal data, which includes data “revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, . . . genetic data and biometric data [processed] for the purpose of uniquely identifying a natural person, data concerning health, or data concerning a natural person's sex life or sexual orientation”.

It is likely that at least some of the data processing will come under this heading as revealing the religious beliefs of the data subjects.

Further Conditions for Processing of Special Categories of Data	Examples
Where we have an individual's explicit consent	<i>To cater for an individual's dietary or medical needs at an event To supply sacramental information about them, at their request, to a parish elsewhere</i>
Where it is necessary for compliance with a legal obligation	<i>Passing on information to the local authority or HMRC</i>
Where it is necessary to protect the vital interests of an individual	<i>Passing on information to the Police Passing on information about an individual's serious health condition to the NHS or a health professional where there is a risk of death or serious injury to that person or another individual</i>
Where information has manifestly been made public	<i>Where an individual has made their Catholic beliefs clear in public media, or the data already appears in a publically-available source such as a Directory</i>
Where we are establishing, exercising or defending legal claims	<i>Providing information to our insurers or lawyers in connection with legal proceedings</i>
Where the processing is for reasons of substantial public interest	<i>Where steps are taken to prevent fraud or other dishonest activity</i>



DIVINE RETREAT CENTRE UK
- Ramsgate -

St. Augustine's Abbey, Ramsgate, Kent CT11 9PA
 Tel: 01843 586 904
 Email: info@divineuk.org Website: www.divineuk.org



Lawful Ground for Processing of Criminal Convictions & Offences Data	Examples
Where the centre is exercising obligations or rights which are imposed or conferred by law on it or the data subject in connection with employment, social security or social protection and the centre has an appropriate policy document in place	<i>To undertake appropriate checks on individuals prior to taking up a role</i>
Where it is necessary for the prevention or detection of an unlawful act	<i>Passing on information to the Police or other investigatory body</i>
Where the centre is complying with or assisting others to comply with regulatory requirements relating to unlawful acts or dishonesty	<i>Passing on information to the Police or other investigatory body</i>
Where it is carried out in the course of safeguarding children or other individuals at risk	<i>Making a safeguarding disclosure</i>
Where information is disclosed for insurance purposes	<i>Ensuring the Diocese has appropriate insurance cover</i>
Where an individual has given their consent to the processing	
Where the centre is establishing, exercising or defending legal claims	<i>Providing information to our insurers or lawyers in connection with legal proceedings</i>
Where it is necessary to protect the vital interests of an individual	<i>Passing on information to the Police</i>

DISCLOSING AND SHARING OF DATA

When receiving telephone or email enquiries, clergy, employees and volunteers should exercise caution before disclosing any Personal Data. The following steps should be followed:



DIVINE RETREAT CENTRE UK - Ramsgate -

St. Augustine's Abbey, Ramsgate, Kent CT11 9PA
Tel: 01843 586 904
Email: info@divineuk.org Website: www.divineuk.org



- *Ensure the identity of the person making the enquiry is verified and check whether they are entitled to receive the requested information.*
- *Require the enquirer to put their request in writing so that their identity and entitlement to receive the information can be verified if the information is particularly sensitive and/or you are not confident the person is entitled to the information.*
- *If there is any doubt, refer the request to the DPM for assistance (particularly where Special Categories of Personal Data are involved).*
- *When providing information, ensure that Personal Data is securely packaged and sent by the most appropriate means (e.g. special delivery, courier or hand delivery) in accordance with the Data Protection Rules, the Privacy policy and this Policy. Personal data should not be sent in, or attached to, insecure e-mails.*

Please also remember that individuals are only entitled to obtain information about themselves and not any other third parties (e.g. a family member, clergy or staff).

SUBJECT ACCESS REQUESTS

Any Data Subject may exercise their rights to access to the Personal Data which the DRC holds about them, or the right to have Personal Data erased.

Any and all such requests should immediately be referred to the DPM. All Subject Access Requests will be dealt with by the DPM. Clergy, employees or volunteers who receive a Subject Access Request must forward it to the DPM immediately in order that such requests can be replied to within the strict deadlines set out in the Data Protection Rules (generally one month from the date of the request).

To be valid, a Subject Access Request must be made in writing (including requests made via email or on social media) and provide enough information to enable the DRC to identify the Data Subject and to comply with the request.

TRANSFERRING DATA OUTSIDE THE EUROPEAN UNION

Personal data will not be transferred or stored outside of the European Union unless this is permitted by the GDPR. This includes storage on a "cloud" based services where the servers are located outside the EU. We will only transfer data outside the EU where it is permitted by one of the conditions for non EU transfers in the GDPR.

MONITORING AND REVIEW

This policy will be reviewed every 12 months and may be subject to change.

CONTACTS

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



DIVINE RETREAT CENTRE UK

- Ramsgate -

St. Augustine's Abbey, Ramsgate, Kent CT11 9PA

Tel: 01843 586 904

Email: info@divineuk.org Website: www.divineuk.org



contact the Data Protection Manager: Vinod George, Divine Retreat Centre, St Augustine's Road, Ramsgate, CT11 9PA.

GLOSSARY

"Data Controller" means a person, organisation or body that determines the purposes for which, and the manner in 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 instructions of the DRC. 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 DRC 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 DRC holds about them.

"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 DRC'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



DIVINE RETREAT CENTRE UK - Ramsgate -

St. Augustine's Abbey, Ramsgate, Kent CT11 9PA
Tel: 01843 586 904
Email: info@divineuk.org Website: www.divineuk.org



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.

PERSONAL DATA WE HOLD ABOUT YOU

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:

- Name, address and contact details.
- Gender, age, date of birth, marital status and nationality.
- Information about your education/work history and professional qualifications (job applicants).
- Information about your current involvement in DRC activities and events (e.g. booking details for events you are attending).
- Financial information (e.g. bank details) and details of any donations you have made to us.
- Information obtained as a result of any background checks on staff and volunteers.
- CCTV recordings and photographs.
- Medical information
- Dietary and health information necessary for events and retreats.
- Any other information which you choose to provide to us.

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).

HOW AND WHY WE PROCESS YOUR PERSONAL DATA

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:

- To communicate with you in relation to our activities, services and events, including seeking feedback and informing you of any changes to our services.
- To carry out the services that we offer.
- To process donations that you may make to us, or other payments.



DIVINE RETREAT CENTRE UK - Ramsgate -

St. Augustine's Abbey, Ramsgate, Kent CT11 9PA
Tel: 01843 586 904
Email: info@divineuk.org Website: www.divineuk.org



- To administer, support, improve and develop the administration of the DRC and operations and to keep the DRC accounts and records up-to-date.
- To process applications from you.
- To ensure we comply with our legal obligations (e.g. by providing information to the Charity Commission or carrying out safeguarding activities).

In the case of CCTV recordings, to prevent or detect crime, and to help create a safer environment for our staff, Volunteers and visitors.

LEGAL GROUNDS ON WHICH WE PROCESS YOUR PERSONAL DATA

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:

- The activities are within our legitimate interests in advancing and maintaining the Roman Catholic religion, and in ensuring the flow of charitable funds for these purposes.
- You may have given consent (which can be withdrawn at any time by contacting us using the details below) for us to process your information (e.g. to send you communications by email or text).
- We are carrying out necessary steps in relation to a contract to which you are party or prior to you entering into a contract
- 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 submit a tax refund claim).
- 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).

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

- Where you have given us your explicit consent to do so (e.g. to cater for your medical or dietary needs at an event)
- Where the Processing is necessary to protect your vital interests or someone else's vital interests (e.g. passing on information to the Police);
- 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)



DIVINE RETREAT CENTRE UK

- Ramsgate -

St. Augustine's Abbey, Ramsgate, Kent CT11 9PA

Tel: 01843 586 904

Email: info@divineuk.org Website: www.divineuk.org



- Where the Processing is necessary for the establishment, exercise or defence of legal claims;
- Where the Processing is necessary for carrying out the Diocese's employment and social security obligations.
- The processing being necessary for reasons of substantial public interest (e.g. where steps are taken to prevent fraud or other dishonest activity).
- Where it is in the substantial public interest, and necessary for the safeguarding of children or vulnerable adults.

WHO WILL WE SHARE YOUR INFORMATION WITH:

- We will only use your Personal Data within the DRC 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.
- We may share your information with government bodies for tax-reclaiming purposes or law enforcement agencies for the prevention and detection of crime.
- We have 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.
- In the course of Processing your Personal Data, or disclosing it to the recipients referred to above, we may have to transfer it to countries which are outside the European Economic Area (EEA). 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 we will take steps to ensure that the transfers comply with the GDPR and that your Personal Data is appropriately protected. We do so by requiring them to satisfy us 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.

HOW LONG WILL WE KEEP YOUR INFORMATION FOR?

Your information will be kept in accordance with our Retention & Disposal of Records Policy. 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.

YOUR RIGHTS:

- You have rights in respect of the Personal Data you provide to us.
- 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) . 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



DIVINE RETREAT CENTRE UK - Ramsgate -

St. Augustine's Abbey, Ramsgate, Kent CT11 9PA
Tel: 01843 586 904
Email: info@divineuk.org Website: www.divineuk.org



- If we Process your Personal Data on the basis that we have your consent, the right to withdraw that consent.
- The right to ask that any inaccuracies in your Personal Data are corrected.
- The right to have us restrict the Processing of all or part of your Personal Data.
- 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”).
- The right to object to us Processing your Personal Data for direct marketing purposes

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.

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 a individual (including children from 12 years upwards) or with their express permission

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.

CONTACT DETAILS

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 Divine retreat Centre. Any queries regarding this Policy should be addressed to the Data Protection Manager.

Date Adopted	
Signed	
Review due in	

