

Privacy Notice - General Data Protection Regulation (“GDPR”)

Please read the following information carefully. This privacy notice contains information about the information collected, stored and otherwise processed about you and the reasons for the processing. It also tells you who we share this information with, the security mechanisms we have put in place to protect your data and how to contact us in the event you need further information.

Who We Are?

We are the Nigerian Catholic Chaplaincy, England & Wales (abbreviated as NCC henceforth). We collect, use your data and are responsible for personal information about you. When we do this, our Chaplain, Peter Babangida Audu act as the Controller of this information for the purposes of the GDPR and the Data Protection Act 2018.

If you need to contact the NCC about your data or the processing carried out you can use the contact details at the end of this document.

What do we do with your information?

Information collected

When carrying out the provision of pastoral/administrative/spiritual services or providing a reference we collect some or all of the following personal information that you provide:

- a. personal details
- b. family details
- c. lifestyle and social circumstances
- d. goods and services
- e. financial details
- f. education, training and employment details
- g. physical or mental health details
- h. racial or ethnic origin
- i. religious
- j. other personal data relevant to instructions to provide those services, including data specific to the service in question.

Information collected from other sources.

The same categories of information may also be obtained from third parties, such as professionals or experts, members of the public, your family and friends, public records and registers, especially of baptism and other Church sacraments.

How we use your personal information: Purposes

We may use your personal information for the following purposes:

- i. to keep accounting records and carry out office administration
- ii. to respond to potential complaints or make complaints
- iii. to respond to requests for references
- iv. when procuring goods and services
- v. to confirm standing in the Church
- vi. as required or permitted by law.

Whether information has to be provided by you, and why

If you have asked for a reference, or your personal information has to be provided, to enable the NCC [*provide the reference, and / or to enable me to comply with my obligations, and to keep accounting records*]

The legal basis for processing your personal information

NCC rely on the following as the lawful bases on which we collect and use your personal information:

- If you have consented to the processing of your personal information, then I may process your information for the Purposes set out above to the extent to which you have consented to me doing so.
- In relation to information which is in categories (g) to (i) above (these being categories which are considered to include particularly sensitive information, I rely on your consent for any processing for the purposes set out in purposes (i), (ii), (iii), (ii), (v) above. I need your consent to carry out processing of this data for these purposes.
- In relation to information in categories (g) to (i) above (these being categories which are considered to be particularly sensitive information and I am entitled by law to process the information where the processing is necessary for proper exercise of my obligations as your Chaplain.
- In relation to information which is not in categories (g) to (i) above, I rely on my legitimate interest and/or the legitimate interests of a third party in carrying out the processing for the Purposes set out above.
- In certain circumstances processing may be necessary in order that I can comply with a legal obligation to which I am subject (including carrying out anti-money laundering or terrorist financing checks).

Who will we share your personal information with?

It may be necessary to share your information with the following:

- data processors, such as my Chaplaincy staff, IT support staff, email providers, data storage providers
- legal professionals
- the staff in the Chaplaincy: paid/voluntary
- communities within the Chaplaincy

- family and associates of the person whose personal information I am processing
- in the event of complaints, Church hierarchy Statutory complaint authorities
- current, past or prospective employers
- business associates, professional advisers and the Diocese
- the intended recipient, where you have asked me to provide a reference.

NCC may be required to provide your information to regulators, such as the Financial Conduct Authority or the Information Commissioner's Office. In the case of the Information Commissioner's Office, there is a risk that your information may lawfully be disclosed by them for the purpose of any other civil or criminal proceedings, without my consent or yours, which includes privileged information.

We may also be required to disclose your information to the police or intelligence services, where required or permitted by law.

Sources of information

The personal information we obtain may include information which has been obtained from:

- other members of Chaplaincy
- communities within the chaplaincy
- organisations within the chaplaincy
- family and associates of the person whose personal information I am processing
- business associates, professional advisers and from the Diocese
- the intended recipient, where you have asked me to provide a reference.
- data processors, such as my Chaplaincy staff, IT support staff, email providers, data storage providers
- priests of the Catholic Church

Transfer of your information outside the European Economic Area (EEA)

This privacy notice is of general application and as such it is not possible to state whether it will be necessary to transfer your information out of the EEA in any particular case or for a reference. However, if you reside outside the EEA or the role for which you require a reference involves persons or organisations or courts and tribunals outside the EEA then it may be necessary to transfer some of your data to that country outside of the EEA for that purpose. If you are in a country outside the EEA or if the request you provide come from outside the EEA then it is inevitable that information will be transferred to those countries. If this applies to you and you wish additional precautions to be taken in respect of your information please indicate this when providing initial requests.

Some countries and organisations outside the EEA have been assessed by the European Commission and their data protection laws and procedures found to show adequate protection. The list can be found [here](#). Most do not. If your information has to be transferred outside the EEA, then it may not have the same protections and you may not have the same rights as you would within the EEA.

NCC may transfer your personal information to the following which are located outside the European Economic Area (EEA):

- [cloud data storage services based in the USA who have agreed to comply with the EU-U.S. Privacy Shield, in order to enable me to store your data and/or backup copies of your data so that I may access your data when they need to. The USA does not have the same data protection laws as the EU but the EU-U.S. Privacy Shield has been recognised by the European Commission as providing adequate protection. To obtain further details of that protection see https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/eu-us-privacy-shield_en.]
- [cloud data storage services based in Switzerland, in order to enable me to store your data and/or backup copies of your data so that I may access your data when I need to. Switzerland does not have the same data protection laws as the EU but has been recognised by the European Commission as providing adequate protection; see https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en.]

If you would like any further information please use the contact details at the end of this document.

How long will we store your personal data?

NCC will normally store all your information:

- until at least 1 year after the expiry of any relevant limitation period (which will usually be 6 years, but may be 12 years, or longer where the case includes information relating to a minor), from the date of the last item of work carried out, the date of the last payment received or the date on which all outstanding payments are written off, [*whichever is the latest/whatever other end point is chosen*]. This is because it may be needed for potential legal proceedings/ other period – *provide justification*. At this point any further retention will be reviewed and the data will be marked for deletion or marked for retention for a further period. The latter retention period is likely to occur only where the information is needed for legal proceedings, regulatory matters or active complaints. Deletion will be carried out (without further notice to you) as soon as reasonably practicable after the data is marked for deletion.
- NCC will store some of your information which we need to carry out conflict checks for the rest of my career. However, this is likely to be limited to [your name and contact details/ the name of the case/anything else]. This will not include any information within categories (g) to (**Error! Reference source not found.**) above.
- Information related to anti-money laundering checks will be retained until five years after the completion of the transaction or the end of the business relationship, whichever is the later;
- Names and contact details held for marketing purposes will be stored indefinitely or until NCC becomes aware or is informed that the individual has ceased to be a potential member.

Consent

As explained above, NCC is relying on your explicit consent to process your information in categories (g) to (i) above. You provided this consent when you became a member of the Chaplaincy, a community/organisation/ group within the Chaplaincy/you asked the Chaplaincy to provide a reference].

You have the right to withdraw this consent at any time, but this will not affect the lawfulness of any processing activity NCC has carried out prior to you withdrawing your consent. However, where NCC also relies on other bases for processing your information, you may not be able to prevent processing of your data.

If there is an issue with the processing of your information, please contact the Chaplaincy using the contact details below.

Your Rights

Under the GDPR, you have a number of rights that you can exercise in certain circumstances. These are free of charge. In summary, you may have the right to:

- Ask for access to your personal information and other supplementary information;
- Ask for correction of mistakes in your data or to complete missing information we hold on you;
- Ask for your personal information to be erased, in certain circumstances;
- Receive a copy of the personal information you have provided to me or have this information sent to a third party. This will be provided to you or the third party in a structured, commonly used and machine - readable format, e.g. a Word file;
- Object at any time to processing of your personal information for direct marketing;
- Object in certain other situations to the continued processing of your personal information;
- Restrict the processing of your personal information in certain circumstances.

If you want more information about your rights under the GDPR please see the Guidance from the Information Commissioners Office on [Individual's rights under the GDPR](#).

If you want to exercise any of these rights, please:

- Use the contact details at the end of this document;
- NCC may need to ask you to provide other information so that you can be identified;
- Please provide a contact address so that you can be contacted to request further information to verify your identity;
- Provide proof of your identity and address;
- State the right or rights that you wish to exercise.

We will respond to you within one month from when we receive your request.

Marketing Emails

Please note if you wish to unsubscribe from any marketing emails that you have signed up for, you can do so by simply clicking on [Unsubscribe](#) at the of our mail chimp email page. It may take 7 working days for this to become effective.

How to make a complaint?

The GDPR also gives you the right to lodge a complaint with the Information Commissioners' Office if you are in the UK, or with the supervisory authority of the Member State where you work, normally live or where the alleged infringement of data protection laws occurred. The Information Commissioner's Office can be contacted at <http://ico.org.uk/concerns/>.

Automated Decision-Making

You have the right to object to the use of your personal information for automated decision-making, please see '[your rights](#)'.

Future Processing

I do not intend to process your personal information except for the reasons stated within this privacy notice. If this changes, this privacy notice will be amended and placed on the Chaplaincy website.

Changes to this privacy notice

This privacy notice was published on 23rd May, 2018 and last updated on 23rd May, 2018.

The Chaplaincy continually reviews its privacy practices and may change this policy from time to time. When it does, an amended privacy notice will be placed on the Chaplaincy website.

Contact Details

If you have any questions about this privacy notice or the information NCC holds about you, please contact the Chaplaincy through Anthony Ogunseitan the appointed Data Protection Officer, using the contact details below.

You can reach the Data Protection Officer though 07957 585 366. The number will go live at 12am on 25th May 2018. Primary form of contact is by text and except in emergency. The email address of the Data Protection Officer (Anthony Ogunseitan) is ncdatapo@gmail.com

If you choose to write, use the following address: 8 King Henry's Walk, London N1 4PB, or contact the Chaplaincy Secretary by email ncchaplaincy@ncchapeng.org.uk or by phone at 02072 493 618 on Tuesdays and Fridays only.