Introduction

• Data Protection Coordinator for the Representative Church Body
• Manage GDPR compliance for Church House, Dublin and Belfast
• Support GDPR compliance across the Dioceses and Parishes

Contact:
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   – 01 - 4125660
What is General Data Protection Regulation (GDPR)?

- New European data protection regulation
- Overhauls and harmonises existing data protection law
- New responsibilities on organisations including religious not for profit

Comes into Effect

25th May 2018
General Data Protection Regulation

- Aligns regulation to the modern digital world
- Ensures that processing of personal data protects and respects individual’s rights
- Standardises, strengthens and enhances individuals rights to the privacy and protection of personal data
- Emphasises transparency, security and accountability

Non-compliance?
Depending on severity - up to 4% of global annual turnover or €20million.....
Some Common Terms

Data Subject
- Natural Living Person

Data Controller
- Person determining the HOW and What

Personal Data
- Information capable of identifying a living person

Processing Data
- Anything you might do with personal data

Special Category Data
- Sensitive personal data
Key Principles... GDPR

Personal data is:

• Processed lawfully, fairly and transparently
• Only used for the specific purpose you received permission for, and no other purpose
• Is adequate, relevant and limited
• Is accurate and kept up to date
• Is only stored for as long as is necessary
• Is kept safe and secure

No keeping data ‘just in case’
Individuals now have rights to:

- **BE INFORMED**
- ACCESS their personal information
- Have personal data **ERASED**
- Have personal data **CORRECTED**
- **RESTRICT** processing
- **OBJECT**
- Data **PORTABILITY**
- **No AUTOMATED** decision making
6 Ways to Process Personal Data

- Consent
- Legitimate Interest
- Processing Personal Data
- Contractual Necessity
- Compliance with Legal Obligations
- Public Interest
- Vital Interest
Consent

- Article 4
  - freely given
  - specific
  - informed
  - unambiguous
  - can be withdrawn

indication of the data subject’s wishes, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.
Legitimate Interest
6 Ways to Process Personal Data

- Consent
- Legitimate Interest
- Contractual Necessity
- Compliance with Legal Obligations
- Vital Interest
- Public Interest
DON’T PANIC

You may already have data protection policies in place, or you may need to start from scratch. Whatever the case, don’t panic!

Once you have started on your journey towards compliance, and have a plan to become compliant, you will be fine!

GDPR puts a responsibility on each Diocese and Parish to show accountability
A quick note on data breach!

What is a breach?

• Something that leads to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data

What do I do?

• Follow your documented procedure which should include:
  – Inform the person in charge of Data Protection in your parish
  – Contact Rebekah Fozzard, Data Protection Coordinator, RCB
  – If a high risk to the individuals involved, e.g. through identity theft, GDPR makes informing the Data Protection Commissioner compulsory
What each Parish needs to do:

1. Agree who is in charge
   - Who is responsible for data protection in your parish?
   - Download the GDPR checklist from the RCB website

2. Become Accountable
   - Review ALL personal data you hold
   - Document how you did your review

3. Develop processes, procedures and notices
   - Data Privacy Notice
   - Parish Retention Policy
   - Procedure on how you get consent
   - Procedure on what to do if a data breach

4. Communicate
   - Poster on your notice board
   - Update parishioners
   - Communicate via parish magazines etc.
<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
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<tbody>
<tr>
<td>Do we need to get consent from parishioners when GDPR commences?</td>
<td>Not necessarily. You may already have existing consent. Just make sure it is explicit</td>
</tr>
<tr>
<td>Can I only use consent?</td>
<td>No, you can rely on another method of consent e.g. legitimate interest. Just document your reason why</td>
</tr>
<tr>
<td>What is a data request?</td>
<td>This is when an individual requests a copy of their personal data. Information must be provided within one month.</td>
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<tr>
<td>Does my Parish need a Data Protection Officer?</td>
<td>No; but someone needs to be in charge of managing data protection at a local level</td>
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And you have been asking

<table>
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<tr>
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<tbody>
<tr>
<td>Does every website need a Data Privacy Notice?</td>
<td>Yes</td>
</tr>
<tr>
<td>Are we regulated by both the Data Protection Authority in Ireland and United Kingdom?</td>
<td>Organisations working cross border are only regulated by the Data Protection Authority where they have their main establishment.</td>
</tr>
<tr>
<td>Can we publish accounts with names, addresses and amounts of donations?</td>
<td>Not without explicit consent from every member to do this. You will have to demonstrate evidence of consent.</td>
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<tr>
<td>How long should we keep minutes of meetings?</td>
<td>Last action plus 5 years and then archive</td>
</tr>
<tr>
<td>What can we do to keep data secure?</td>
<td>Have as much as you can online; don’t have boxes of information unsecured; have strong passwords; locked cabinets</td>
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Final Thoughts

Compliance with data protection is something which will have to be lived, rather than a box to be ticked or a policy to be drafted and then set aside.

GDPR compliance will have to be in the back of one’s mind when dealing with any personal data.

Questions?