

**SPIRITUAL ASSOCIATION OF THE  
COMPASSIONATE HEARTS OF JESUS AND MARY**



**GENERAL PRIVACY NOTICE**

**Your personal data – what is it?**

“Personal data” is any information about a living individual which allows them to be identified from that data (for example a name, photographs, videos, email address, or address). Identification can be by the information alone or in conjunction with any other information. The processing of personal data is governed by the Data Protection Act 2017, the General Data Protection Regulation 2016/679 (the “GDPR”) and other legislation relating to personal data and rights such as the Human Rights Act 1998.

**Who are we?**

This Privacy Notice is provided to you by the Spiritual Association of the Compassionate Hearts of Jesus and Mary (hereafter called ‘The Association’), which is the data controller for your data. We will not share your data with any other organisation without your permission, except where there is a statutory duty to do so.

**What data does The Association process?**

It will process some or all of the following where necessary to perform its tasks:

Names, titles, and aliases, photographs;

Contact details such as telephone numbers, addresses, and email addresses;

The data we process may constitute sensitive personal data because, as a Christian organisation, the fact that we process your data at all may be suggestive of your religious beliefs.

**How do we process your personal data?**

The Association will comply with its legal obligations to keep personal data up to date; to store and destroy it securely; to not collect or retain excessive amounts of data; to keep personal data secure, and to protect personal data from loss, misuse, unauthorised access and disclosure and to ensure that appropriate technical measures are in place to protect personal data.

The Association uses your personal data for some or all of the following purposes:

To maintain our own accounts and records;

To maintain an email address list, database or similar record keeping mechanism, thus enabling the Association to contact you with information about its activities, circulation of newsletters or other material by email and social media;

To process a donation you have made, or a payment for activities such as a Retreat or Quiet Day;

To seek your views or comments;

To notify you of changes to the Association’s events and personnel;

To send you communications which you have requested and that may be of interest to you. These may include information about campaigns, appeals, other activities;

### **What is the legal basis for processing your personal data?**

Most of our data is processed because it is necessary for our legitimate interests, or the legitimate interests of a third party (such as another a bank when processing cheques or electronic payments).

The Association may also process data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract. An example of this would be processing your data in connection with a Retreat or Quiet Day.

Religious organisations are also permitted to process information about your religious beliefs to administer membership or contact details.

Where your information is used other than in accordance with one of these legal bases, The Association will first obtain your consent to that use.

### **Sharing your personal data**

Your personal data will be treated as strictly confidential. It will only be shared with third parties where it is necessary for the performance of the Association's tasks or where you first give us your prior consent. It is likely that we will need to share your data with some or all of the following (but only where necessary):

Our agents, servants and contractors. For example, we may ask a commercial provider to send out newsletters on our behalf, or joining details about an event.

### **How long do we keep your personal data?**

The Association will keep some records permanently if we are legally required to do so. We may keep some other records for an extended period of time. For example, it is current best practice to keep financial records for a minimum period of 7 years to support HMRC audits. In general, we will endeavour to keep data only for as long as we need it. This means that we may delete it when it is no longer needed.

### **Your rights and your personal data**

*You have the following rights with respect to your personal data:*

When exercising any of the rights listed below, in order to process your request, The Association may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.

*The right to access information we hold on you*

At any point you can contact us to request the information we hold on you as well as why we have that information, who has access to the information and where we obtained the information from.

Once we have received your request we will respond within one month.

There are no fees or charges for the first request but additional requests for the same data may be subject to an administrative fee.

*The right to correct and update the information we hold on you*

If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated.

#### *The right to have your information erased*

If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase the data we hold.

When we receive your request we will confirm whether the data has been deleted or the reason why it cannot be deleted (for example because we need it for our legitimate interests or regulatory purpose(s)).

#### *The right to object to processing of your data*

You have the right to request that we stop processing your data. Upon receiving the request we will contact you and let you know if we are able to comply or if we have legitimate grounds to continue to process your data. Even after you exercise your right to object, we may continue to hold your data to comply with your other rights or to bring or defend legal claims.

#### *The right to data portability*

You have the right to request that we transfer some of your data to another controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.

#### *The right to withdraw your consent to the processing at any time for any processing of data to which consent was sought.*

You can withdraw your consent easily by email.

#### *The right to object to the processing of personal data where applicable.*

#### *The right to lodge a complaint with the Information Commissioner's Office.*

### **Transfer of Data Abroad**

Any electronic personal data transferred to countries or territories outside the EU will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the European Union. Our website is also accessible from overseas so on occasion some personal data (for example in a newsletter) may be accessed from overseas.

### **Further processing**

If we wish to use your personal data for a new purpose, not covered by this Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

### **Changes to this notice**

We keep this Privacy Notice under regular review and we will place any updates on The Association's website. This Notice was last updated in May 2018.

### **Contact Details**

Please contact us if you have any questions about this Privacy Notice or the information we hold about you or to exercise all relevant rights, queries or complaints to:

John-Francis Friendship, by email at [cchjm@outlook.com](mailto:cchjm@outlook.com)

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

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