**Introduction**

The Diocese is committed to protecting the personal data of those who partake in the Annual Diocesan Pilgrimage to Lourdes and this Privacy Notice sets out important information about how the Diocese collects and uses the personal data of Assisted Pilgrims and Official Volunteer Helpers.

The Bishop is the data controller of your personal data.

You should read this Notice carefully and raise any questions you may have with the Diocesan Secretary or Data Protection Officer.

**How the Diocese gets your information**

We get information about you from the following sources:

* Directly from you when you apply to be an Assisted Pilgrim or Official Volunteer or when you complete the Medical Form (Assisted Pilgrims only);
* From images/photographs and videos;
* From your vetting application, if you need to be vetted in connection with your role.

**What personal data does the Diocese process?**

The Diocese processes the follow personal data:-

* Assisted Pilgrims
* Personal contact details such as your name, address, contact telephone numbers (landline and mobile) and personal email addresses
* Your date of birth, gender and marital status;
* Medical data, including medicines, medical assessment and European Health Insurance Card details;
* Next of kin, emergency contacts and their contact information;
* Personal data which you otherwise voluntarily provide;
* A copy of your passport or similar photographic identification.
* Photographs and videos
* Volunteers (including Youth & Youth Leaders, Nurses, Doctors, Handmaidens, Brancardiers)
* Personal contact details such as your name, address, contact telephone numbers (landline and mobile) and personal email addresses;
* Your date of birth, gender and marital status;
* A record of the number of years you have participated in the Diocesan Pilgrimage to Lourdes;
* Vetting application and associated documentation;
* A record of your Acknowledgment & Acceptance of the Code of Conduct;
* Parental/guardian consent to participation in the pilgrimage, if required;
* Garda Vetting disclosure and associated paperwork, where applicable;
* European Health Insurance Card details;
* Next of kin, emergency contacts and their contact information;
* Personal data which you otherwise voluntarily provide;
* A copy of your passport or similar photographic identification;
* A record of medical personnel’s registration number with the appropriate regulatory authority.
* Photos and videos

**Why does the Diocese process your personal data?**

The Diocese uses the following information to carry out administrative tasks in relation to the pilgrimage and to comply with legal obligations. Below are some of the main reasons why we process your personal data:

* To carry out administrative tasks regarding the Diocesan pilgrimage, including assessments of applications;
* To carry out our safeguarding obligations (see Safeguarding Privacy Notice);
* To provide medical care during the pilgrimage, where necessary;
* To administer your Garda vetting application;
* To comply with our obligations under Garda vetting legislation.
* To contact next of kin, if necessary;
* To assist in the event of theft of passport or to assist in the identification of an individual who may become separated from the group;
* To comply with our legal obligations

**Legal basis for processing your data**

Depending on the processing activity, we rely on the following lawful bases for processing your personal data under the GDPR:

* Article 6(1)(a) where you have consented to us processing your data.
* Article 6(1)(b) for the performance of a contract.
* Article 6(1)(c) so we can comply with our legal obligations.
* Article 6(1)(d) in order to protect your vital interests or those of another person.
* Article 6 (1)(e) for the performance of a task carried out in the public interest.
* Article 6(1)(f) for the purposes of our legitimate interest.

Where the information we process is special category data, for example your health data, the additional bases for processing that we rely on are:

* Article 9(2)(a) where you have given your explicit consent to us processing your data.
* Article 9(2)(c) to protect your vital interests or those of another person where you are incapable of giving your consent.
* Article 9 (2) (d) where the processing is carried out in the course of the Diocese’s legitimate activities and where it relates solely to persons who have regular contact with it in connection with its purposes and where the personal data is not disclosed outside the Diocese without your consent;
* Article 9(2)(f) for the establishment, exercise or defence of legal claims.
* Article 9(2)(g) processing is necessary for reasons of substantial public interest.
* Article 9(2)(h) for the purposes of preventative medicine, provision or treatment of healthcare.

In certain circumstances, it is necessary for volunteers to be Garda vetted. Where this applies, the Diocese may process personal data regarding criminal convictions. The lawful basis we rely on to process this data are:

* Article 6(1)(b) for the performance of a contract.
* Article 6(1)(c) so we can comply with our legal obligations.

**Who does the Diocese share your data with?**

The Diocese will share your personal data to comply with a legal obligation, to protect vital interests or otherwise in pursuit of the Diocese’s legitimate business interests. We may share your information with the following:

* Garda National Vetting Bureau
* Medical practitioners
* Statutory agencies or regulatory bodies
* Professional advisors

Where permitted by law, we reserve the right to release personal data without your consent and without consulting you, including where we believe this is appropriate to comply with our legal obligations.

We may share information with service providers but only when an appropriate service provider contract is in place.

**How the Diocese stores your information**

**Storage of data** - Your data is stored in both manual and electronic format.

* **Manual files** are kept in locked filing cabinets with access controls. There are no files in public areas and the offices are locked when unoccupied.
* **Electronic files** are stored usinguse Microsoft Office 365’s cloud-based services.
* All mobile phones have secure pin numbers/biometric security in place with screens locking after a number of minutes if left unused. (Communication Channel for sending group text messages)
* All information is accessed only by authorised personnel.

**Retention of data -** Your data is retained for the periods set out in the Diocesan Retention Policy. As a general rule, we keep your information for a specified period of time. Typically, this information is kept for one year after the pilgrimage has ended. The copy of your passport will be deleted upon return to Ireland after the pilgrimage.

Some personal data may be retained for significant additional periods for archival, historical or safeguarding reasons. The length of time it is retained will depend on a number of factors including: -

* The type of data
* The purpose for which it was collected
* Legal or regulatory rules

**Transfer of your personal data outside the European Economic Area (“EEA”)**

Your data will not be transferred outside the EEA.

**Are there any other considerations?**

During the pilgrimage, photographers who are not engaged by or affiliated with the Diocese, may take your photo. These photos are then displayed at various locations in Lourdes. The Bishop is not the data controller of these photographs and the Diocese has no role in the taking of these photographs

**Your data protection rights**

You have a number of rights under the GDPR and the Acts. These include the following: -

* **Informed** – you have the right to be informed about any personal data that we hold relating to you, including information as to the accuracy of the data and the purpose for which it is used;
* **Access** – you have the right to be given a copy of all of your personal data on request;
* **Rectification** – you have the right to have any inaccurate data held by us rectified free of charge;
* **Restriction** – where there is a dispute in relation to the accuracy or processing of your personal data, you can ask for a restriction to be placed on further processing;
* **Withdraw** – where we rely on your consent to process your personal data, you can withdraw your consent;
* **Object** – you have the right to object to the processing of your personal data;
* **Erasure** – you have the right to request us to delete your personal data, this is known as the “right to be forgotten”;
* **Data portability** – you have the right to request us to provide you or a third party, with a copy of your personal data in a structured, commonly used machine-readable format.

The above rights are subject to certain exceptions and may be restricted in certain circumstances.

Rights may only be exercised by the individual whose information is being held by the Diocese or with that individual’s express permission. We may request proof of identity for verification purposes before you can exercise any of these rights.

**Contact**

If you have any queries, please contact the Diocesan Secretary or the Data Protection Officer.