



The Indian Orthodox Church CLG (St. Thomas Indian Orthodox Church)

**Malankara House, Old Lucan Road, Palmerstown, Dublin 20, D20 VP97, Ireland.
Charity Reg. No - 17764**

DATA PRIVACY NOTICE

Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (the "GDPR").

We may record and process some or all of the following personal information about you:

- contact details (address, phone numbers, email address)
- date of birth
- date of marriage
- photographs/video recordings
- financial giving to the church
- religious beliefs
- health and medication

Who are we?

The Indian Orthodox Church company limited by guarantee (CLG) is a Parish of the Malankara Orthodox Church (hereinafter referred to as "Parish/Our Parish"). We are a fully registered charitable organization registered with the Company Registrar and the Charity Commissioners. Our other registered names are St. Thomas Charitable Foundation and St. Thomas Indian Orthodox Church. we carry on the business of a Christian church engaged in the advancement of Christianity, to further diocesan activities, to support the clergy and to support the upkeep of the church and to organizes church services and prayer meetings.

Our Parish is committed to protecting all information that we handle about people we support and work with, and to respecting people's rights around how their information is handled. This policy explains our responsibilities and how we will meet them.

How do we process your personal data?

Our Parish complies with its obligations under the "GDPR" by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We use your personal data for the following purposes: -

- (a) To provide pastoral care and to administer membership records,
- (b) To encourage you in your discipleship and provide pastoral care to you as part of the church family, eg by visiting at your home, calling your telephone, or sending a text message or email.
- (c) For the purposes of communicating with you and providing general updates, news, events, activities, sending birthday and wedding wishes via SMS / Cards, prayer timings & address to reach and Holy service timings,
- (d) To keep you informed about life in the church family, eg by sending you occasional notices by post, email or text message, including information about the Regional & Diocesan office.

- (e) To promote the spiritual interest of the congregation, to contact members to collect/fundraise Parish contribution or for charitable activities/mission and to promote the interest of the Parish and Charity,
- (f) process your involvement in activities of the church family, including groups that meet regularly as well as residential and other special trips
- (g) To maintain the Parish's own account and records (legal obligation) - PPS number recorded in the IOC authorization forms will be processed only for claiming Charity donations refund from Revenue Commissioner in Ireland,
- (h) To publish parishioners the eligibility list to participate in the AGM / EGM, electoral list in the Parish notice board, Contribution list and to publish your name in the Annual Report including your arrears and generous contribution,
- (i) To share your contact details with the Regional & Diocesan office for events, spiritual organizations (Regional and Diocesan) and with the Catholicate Office, Holy Synod or Parent Church office in India if requested or elected from Parish to the Malankara Association, as and when instructed by and from the office of His Holiness Catholicos office or by the Diocesan Metropolitan,
- (j) encourage you to give money to the church for our ongoing mission and property maintenance, in addition to funds of the Regional & Diocesan and Malankara office that support: mission in Ireland () and overseas (); committee approved charity operations, and; overseas aid
- (k) To use your Home Parish or Home contact number in India at the event of an emergency,
- (l) To operate the Parish website and deliver service that individuals have requested,
- (m) To promote the functioning of the Spiritual organization of the Parish and to publish limited personal information in the Parish publication.
- (n) facilitate the organisation of the Spiritual organization of the Parish and to publish limited personal information in the Parish publication.
- (o) operate an email/SMS prayer line

What is the legal basis for processing your personal data?

Is dependent upon the data subject (individual) and the purpose of the data processing. For example, the data processing for a Parishioner in terms of what data is collected and how it is further processed is different from that of a member of our congregation. Legal bases we rely on will primarily consist of one or more of the followings:

Our legal bases for processing your data are 'legitimate interests' (for activities related to the everyday functioning of the church) [GDPR Article 6.1(f)] and 'consent' (for everything else) [Article 6.1(a)]. In a small number of instances, we rely on 'contract' (for example, if we are your employer) and 'legal obligation' (for example, in relation to safeguarding issues).

When using 'legitimate interests' as the legal basis for using the information you have given us we will ensure it is for a genuine purpose, necessary for the smooth running of the church family, and not invasive to your privacy. For all other purposes, we will ask for your positive consent before processing your details.

- We are able to process 'special categories of personal data' (such as your health or religious beliefs) in the course of our legitimate activities because we are a not-for-profit body with a religious aim relating to you as a member, former member, or person with whom we have regular contact [Article 9.2(d)].
- Processing is necessary for the purposes of legitimate interests pursued by us or a third party except where such interests are overridden by the interests, rights or freedoms of the data subject. This is where we need to use your data to engage in our normal day to day activities e.g. keeping a record of your name and address on our membership list.
- Processing is carried out by us in our capacity as a not-for-profit body with a political, philosophical, religious or trade union aim provided: -
 - The processing relates only to members or former members (or those who have regular contact with it in connection with those purposes); and
 - There is no disclosure to a third party without consent other than consent.
 An example of this may be where a record of sensitive data may need to be kept by us so that effective pastoral care may be provided to members;
- Explicit consent of the data subject. An example of this would be your consent to joining a mailing list so that we can keep you informed about news, events, activities and services and process your IOC donations from revenue and keep you informed about Parish events;
- Processing is necessary for us to comply with the law. Examples of this could be our legal obligations to maintain certain records so that we may carry out our obligations under employment, social security or social protection law or a collective agreement; and
- Processing is necessary for us to protect the vital interests of a data subject that cannot physically or legally give consent. An example of this may be for us to run special needs activities.

Sharing your personal data

Your personal data will be treated as strictly confidential and will only be shared with other members of the church in order to carry out a service to other church members or for purposes connected with the church. We will only share your data with third parties outside of the parish with your consent.

Only people appointed to specific roles within the circuit (for example, committee members, spiritual organisation leads and secretary, trustee and pastoral visitors, society/circuit stewards, preachers, membership secretaries) can access your details, and what they can see is limited to what they need in order to carry out their role.

If you are appointed to a specific role within the life of the church and/or circuit we may publish your details (eg in announcement sheets, annual reports or our web presence) or share them directly so members and other relevant individuals/organisations can contact you. This will cease when you step down from the role.

We occasionally post photographs and/or video taken at church events on our website www.indianorthodox.ie and/or other online platforms: Facebook:

If you donate money to us on behalf of specific functions we will send the details of such gift.

If you donate money to us for Malankara and Dioses functions we will send your name along with your gifts.

We will not share your information with any other third parties without your permission unless we have a legal obligation to do so. However, we may need to share your details within the IOC in Ireland, as follows:

- to comply with our Safeguarding policy when you volunteer with children and vulnerable adults.
- if your role within the spiritual organization means you need to receive specific information related to that role.

How long do we keep your personal data?

This can vary,

We retain members' data while it is still current;

Parish authorizations and associated paperwork for up to 6 years after the calendar year to which they relate.

Garda vetting authorization form and vetting outcome are retained up to three years or otherwise, the subject leaves the position/until the legal validity or whichever happens sooner to engage in relevant services to Children and Young in the Parish.

Parish register and registers or records of confession, electoral list- approved and final eligibility list of the attendance of AGM / EGM, Minutes book of Managing Committee, subcommittee, baptisms, marriages, funerals and annual report, reference letters, a copy of parish publication are retained permanently. The full list of artefacts and validity information are available here

Where consent has been obtained, to attend a one-off activity, conferences, additional parish publications, promotional printouts, spiritual organizations activity related, competitions, details of volunteers, visa-related documents for guest we will normally retain this for one year and destroyed securely.

One-off consent forms (such as for annual group membership or booking for trips etc) will be destroyed/erased one year after their use.

Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data: -

- The right to request a copy of your personal data which Our Parish, Dublin holds about you
- The right to request that Our Parish, Dublin corrects any personal data if it is found to be inaccurate or out of date
- The right to request your personal data is erased where it is no longer necessary for Our Parish, Dublin to retain such data
- The right to withdraw your consent to the processing at any time
- The right to request that the data controller provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable)

[*Only applies* where the processing is based on consent or is necessary for the performance of a contract with the data subject and in either case the data controller processes the data by automated means]

- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on the further processing
- The right to object to the processing of personal data, (where applicable)
[*Only applies where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics*]
- The right to lodge a complaint with the Data Protection Commissioner (Ireland)

Further processing

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

IT, Website and General Media

Our Parish maintaining the following websites, email ids, and updates the following Social Media groups.

Websites

<http://indianorthodoxireland.ie/>

<http://indianorthodoxireland.org> (redirected to .ie)

<http://iocdublin.org/> (Internal website used for Development and testing)

Official Emails

vicar at indianorthodoxireland.ie

office at indianorthodoxireland.ie for

admin at indianorthodoxireland.ie

no reply at indianorthodoxireland.ie used by website automatic replies

oikoumene at indianorthodoxireland.ie

webindianorthodoxireland at gmail.com (Internal website external email id)

[Indianorthodoxchurchdublin at gmail.com](mailto:Indianorthodoxchurchdublin@gmail.com)

[list others here]

Social Media

Facebook <https://www.facebook.com/pg/IndianOrthodoxCommunity/about/>

Contact Details

To exercise all relevant rights, queries or complaints please in the first instance contact our nominated Data Protection Lead: **Mr John P. Mathew**

Vicar or Email – **vicar@indianorthodoxireland.ie**

Parish Office Email – **office@indianorthodoxireland.ie**

You can contact the Data Protection Commissioner (Ireland) on +353 (0761) 104 800; via email- info@dataprotection.ie or by writing to The Data Protection Commissioner, Canal House, Station Road, Portarlinton, Co. Laois, R32 AP23.

Signed:

Position:

Date:

Review Date:

Revision History

Version Number	Date	Author/Owner	Description of Change
1.0	15/07/2018	Binoy Abraham	Baseline version