

Privacy Notice for Vetting Applicants

Archdiocese of Cashel & Emly

Introduction

The General Data Protection Regulation 2016 (“GDPR”) requires organisations to comply with a range of laws regarding personal data. The Archdiocese of Cashel & Emly is obliged to give you certain information about how your data is treated and this information is contained in this Privacy Notice. You should read this Notice carefully and raise any questions you may have with the Diocesan Vetting Service or Diocesan Data Protection Officer.

This Privacy Notice applies to vetting applicants who are vetted via the Diocesan Vetting Service, including those vetted for affiliate organisations.

How the Diocesan Vetting Service gets your information

We may obtain information about you from the following sources:

- From you or from your parish, when you submit a vetting application, and identification or proof of address documents, or provide us with other information regarding your vetting application
- From affiliate organisations if you are being vetted for an affiliate
- From the Garda National Vetting Bureau, when they provide a vetting disclosure

What personal data does the Diocesan Vetting Service process?

We process the following personal data:

- All personal data contained in Forms NVB1, NBV2 and NVB3 (where appropriate). This includes: name and contact details, date of birth and previous addresses
- A copy of your identification documents and proof of address documents (where appropriate)
- Your role with the diocese, parish or affiliate and the period for which you are engaged
- Garda vetting disclosure including details of criminal records and specified information¹ where applicable
- The date re-vetting is required
- All associated paperwork, where applicable.

Why does the Diocesan Vetting Service process your personal data?

We process your personal data in order to perform our statutory, contractual and other legal obligations and to do the following:

¹ Specified information means information concerning a finding or allegation of harm to another person by the vetting applicant received by the National Vetting Bureau from An Garda Síochána or another prescribed organisation. It is information that is considered to reasonably give rise to a concern that the vetting subject may (i) harm any child/vulnerable person; (ii) cause any child/vulnerable person to be harmed; (iii) put any child/vulnerable person at risk of harm; (iv) attempt to harm any child or vulnerable person; (iv) incite another person to harm any child/vulnerable person.

- To comply with our legal obligations under the National Vetting Bureau (Children and Vulnerable Persons) Act, 2012
- To process your Garda vetting application (including on behalf of affiliates)
- To assess your suitability to work or volunteer with the parish
- To carry out our safeguarding obligations (see Safeguarding Privacy Notice)
- To carry out our contractual obligations as data processors of our affiliates.

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 we process your data with your consent.
- Article 6(1)(b) - processing necessary for the performance of a contract.
- Article 6(1)(c) - compliance with our legal obligations.
- Article 6(1)(d) - to protect the vital interests of another person.
- Article 6(1)(e) - the performance of a task carried out in the public interest.
- Article 6(1)(f) - for the purposes of the Diocese's/parish's/affiliate's legitimate interest.

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

- Article 9(2)(a) - where we have your explicit consent.
- Article 9(2)(b) - where it is necessary for the purposes of carrying obligations in the field of employment law
- Article 9(2)(c) - to protect the vital interests of another person.
- Article 9(2)(f) - for the establishment, exercise or defence of legal claims.
- Article 9(2)(g) - necessary for reasons of substantial public interest.

Who does the Diocesan Vetting Service share your data with?

The Diocesan Vetting Service will share personal data of vetting applicants with other parties only in limited circumstances and where this is authorised under data protection laws. We may share your information with the following:

- Garda National Vetting Bureau
- Affiliates (where you are vetted for a role in an affiliate)

In limited circumstances, it may be necessary to share your personal data with professional advisors (e.g. if we need to get legal advice) or with statutory agencies.

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.

How the Diocesan Vetting Service stores your information

We store your data in both manual and electronic format. **Manual files** are kept in locked filing cabinets in staff offices. There are no files in public areas and the offices are locked when unoccupied. **Electronic files** are stored using Microsoft Office 365's cloud-based services. When you are vetted for a parish in the Diocese, your name and personal details are stored in a Diocesan database. This assists the Diocese in keeping a record of who is vetted, for what role they are vetted and when re-vetting is required.

Your data is retained for the periods set out in the applicable Retention Policy. Some personal data may be retained for significant periods for archival, historical or safeguarding reasons.

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 Vetting Service at: [insert email] or the Diocesan Data Protection Officer at E-mail: dpo@cashel-emly.ie