

# PRIVACY STATEMENT

Issued By: Catholic Diocese of Portsmouth  
1199568 (England), 457 (Jersey), CH236 (Guernsey)

Operative Date: 01 April 2025

Approval Date: 02 May 2024



## 1. PURPOSE OF THIS PRIVACY NOTICE

- 1.1. This privacy statement describes how The Catholic Diocese of Portsmouth collects and uses your **Personal Data** and any personal data relating to others that you share with us.
- 1.2. Your personal data is collected in a range of formats and settings – from information you have provided to us, from automated technologies and interactions and third parties or publicly available sources. This includes your roles and activities such as:
  - 1.2.1. an employee
  - 1.2.2. a volunteer
  - 1.2.3. a priest, deacon, seminarian, or deacon in training
  - 1.2.4. a parishioner, including records of baptism, first communion, confirmation or marriage
  - 1.2.5. a participant in any Diocesan activity or event, including those within our parishes
  - 1.2.6. an appointed school governor, Trustee or Committee member
  - 1.2.7. a financial donor
  - 1.2.8. an applicant for grants from our charitable funds
  - 1.2.9. a contractor
  - 1.2.10. a complainant
  - 1.2.11. a user of our facilities, including our website
  - 1.2.12. a sender or recipient of email communication to or from the Diocese.
- 1.3. This statement explains how we use and protect the information that you provide to us or that we obtain or hold about you and helps you to understand what your rights are in relation to information that we hold. This notice applies to information about living identifiable individuals only.
- 1.4. It is important, also, that you read this privacy statement together with any other privacy notice that we have provided or may provide to you when we are collecting or processing personal data about you in other contexts. This privacy notice supplements any other notice that we provide to you.
- 1.5. This statement should be read together with our **Cookie Policy** that can be found on our website. Summary details about our use of cookies are set out in Section 10 of this privacy statement.

## 2. WHO WE ARE AND OUR RESPONSIBILITY

- 2.1. The **Catholic Diocese of Portsmouth** (The Diocese) is a charity registered with the Charity Commission in England and Wales. Our Charity Number is 1199568 and our registered address is St Edmund House, Bishop Crispian Way, Portsmouth, PO1 3QA. In this notice, references to '**we**', '**our**' and '**us**' mean the Diocese and reference to '**you**' means anyone providing the Diocese with personal data.
- 2.2. When you provide us with **personal data** in order to engage with us and/or benefit from our parish and diocesan activities, summarised in section 1.1, we will keep a record of the data you give to us in order to enable us to comply with our statutory obligations and to achieve our charitable objectives of advancing and maintaining the Roman Catholic religion through the operation of our parishes and our other activities.
- 2.3. Everyone has rights regarding how their personal data is handled by organisations. We are committed to ensuring that your personal data is properly and securely managed in accordance with the relevant data protection laws and believes this is an important part of achieving trust and confidence between the Diocese and those with whom it interacts.
- 2.4. For the purpose of the UK General Data Protection Regulation (UK GDPR), the Diocese is the **data controller** (see definition in the Terminology section at the end of this statement) in respect of your personal data. In some cases, the Diocese may be a joint Data Controller of your personal data (e.g., where your data is shared between the Diocese and another organisation such as a parish school for a particular purpose). We are registered with the **Information Commissioner's Office** (the ICO) in the United Kingdom with registration number Z8254251.
- 2.5. It is important to note that our parishes form part of the Diocese and are not separate legal entities. **Parishes are not separate data controllers**, and parishes process data as part of the Diocese. Parishes are not defined as separate data processors.

## 3. PERSONAL DATA WE COLLECT AND HOLD ABOUT YOU

- 3.1. **Personal data**, or personal information, means any information about a living individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).
- 3.2. We may collect, use, store and transfer different kinds of personal data about our employees, volunteers, priests, deacons, seminarians, deacons in training, parishioners, users of our premises, those who are interested in and support of the work of the Diocese, individuals who provide services to us and individuals who contact us.
- 3.3. We have grouped the different kinds of personal data together that may be collected and processed, but not limited to, as follows:
  - 3.3.1. **Administrative data** includes details about you included in the events, plans and meetings of the Diocesan Trustees and their committees, the Curia and its Vicariates and Departments, and Parish and Pastoral Areas; parish notices; lists of room bookings and attendance records; invoices; supplier and contractor details; catering records.
  - 3.3.2. **Clergy and Vocation data** includes records of CV, applications, assessments, seminarian training, priesthood and diaconate offices held and moves, ongoing training, pension and wills, commendations and investigations of complaint, details about next of kin and other details relating to your office.
  - 3.3.3. **Communication data** including your preferences in receiving communications from us.

- 3.3.4. **Contact data** includes your name, home address, business address, email address and telephone numbers, your parish e.g. information used to contact you.
- 3.3.5. **Demographic information** such as postcode, preferences and interests.
- 3.3.6. **Education data**, including qualifications and vocational history, such as for employees, volunteers, priests, deacons and seminarians.
- 3.3.7. **Employment data** includes employment history, training records, pension information, details about next of kin and other details relating to your employment.
- 3.3.8. **Financial data** includes bank account and payment card details.
- 3.3.9. **Identity data** includes first name, maiden name, last name, date of birth, gender marital status, title, username or similar identifier, family members, biography, nationality, passport information.
- 3.3.10. **Image data** includes photographs taken of you where it is possible to identify you and images of you caught by any CCTV, video streaming or similar devices.
- 3.3.11. **Marketing and Communications data** includes your preferences in receiving information from us about church events and fundraising and our third parties and your communication preferences.
- 3.3.12. **Parental Contact data** includes details of parents (e.g. on parent contact forms)
- 3.3.13. **Parish data** includes records of baptism, first communion, confirmation or marriage.
- 3.3.14. **Special Categories of data** includes information about your religious beliefs, information about your health and any medical conditions or disabilities, information revealing racial or ethnic origins, information concerning your sexual orientation or in the case of background checks, information about criminal records or proceedings. Special categories of data may be collected where necessary for safeguarding purposes, or as part of vocation to become a priest or deacon, or to hold an office in the Catholic Church, or for employment purposes, or where required by law and in keeping with the Safeguarding Privacy Notices.
- 3.3.15. **Tax data** includes national insurance numbers and other information that may be required by HMRC relating to gift aid donations and other tax related payments and receipts.
- 3.3.16. **Technical data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions. Data communicated while using the service operating system and platform and other technology on the devices you use to access any websites or social media operated by the Diocese.
- 3.3.17. **Third-Party data** includes details **about you from third parties**, for example, your family members, other parishioners, other dioceses, medical professionals, the police, and other law enforcement bodies.
- 3.3.18. **Transaction data** includes details about payments to and from you, and other details such as remuneration, reimbursements, grants, donations and legacies, room hire, licence agreement or rental agreements that you enter into with us relating to our premises.

### **If you fail to provide personal data**

- 3.4. Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with accommodation under a tenancy agreement or process gift aid payments). We will notify you if this is the case at the time.

### **Dealing with reports of abuse**

- 3.5. We take all reports of abuse in the Diocese very seriously. If a report is made, we will handle it in accordance with our established **safeguarding procedures**. This is likely to involve the processing of personal information about various individuals, including victims and survivors, alleged perpetrators, and witnesses.
- 3.6. As part of our procedures, we may appoint and share personal information with an investigator or assessor from outside the Diocese to investigate and to advise us on appropriate action to take. Where we believe it is necessary to do so, we will also share personal information with the statutory authorities, such as the police or local authority. We will always handle reports sensitively and keep individuals informed about how their personal information will be used.
- 3.7. We have prepared a separate privacy notice for victims and survivors available on our website. If you wish to make a report of abuse, please contact our Safeguarding Team at [safeguarding@portsmouthdiocese.org.uk](mailto:safeguarding@portsmouthdiocese.org.uk).

## **4. HOW AND WHY WE PROCESS YOUR PERSONAL DATA**

- 4.1. The Diocese takes its obligations under data protection law (including the UK General Data Protection Regulation (UK GDPR)) seriously. We keep personal data as up to date as possible and take active steps to rectify any personal data we find to be incorrect. We store and destroy personal data securely and do not collect or retain personal data which is in excess of our processing activities. We take steps to protect all **personal data** (including **special category data**) from loss, misuse, unauthorised access and disclosure by ensuring that appropriate measures are in place to protect personal data.
- 4.2. We ensure that personal data is processed in accordance with the principles of the UK GDPR and is processed:
  - 4.2.1. Lawfully, fairly and in a transparent manner.
  - 4.2.2. For specified, explicit and legitimate purposes and not processed in a manner which is incompatible with those purposes.
  - 4.2.3. Accurately, relevantly and limited to what is necessary in relation to the purposes for which it is processed.
  - 4.2.4. Kept accurate and where necessary kept up to date, with all reasonable steps being taken to ensure that all inaccurate data is erased or rectified without delay.
  - 4.2.5. Is not kept longer than is necessary for the purposes for which the personal data is processed.
  - 4.2.6. In a manner that ensures appropriate security of the Personal Data including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage by using appropriate technical and organisational measures.

## **Our purpose for processing data**

- 4.3. We collect data necessary to pursue our stated charitable objectives, which is the advancement of the Roman Catholic religion in the Diocese of Portsmouth through its parishes, schools and others.
- 4.4. The **personal data** which we hold about you, whether it is collected directly from you or whether we receive it from a third party, may be **processed** in a number of ways. For example:
  - 4.4.1. to communicate with you in relation to news about our activities and events taking place in the Diocese or in any Diocesan parish, including seeking feedback and informing you of any changes to our activities.
  - 4.4.2. to improve our activities and the way we communicate with you and promote our activities, including the use of our website or the website of any parish.
  - 4.4.3. to administer and support vocation to the priesthood and diaconate including seminarian training, and the ongoing formation and personal support of priests, deacons and retired clergy.
  - 4.4.4. to publicise details of office holders, relevant employees and other volunteers, in order to further the mission of the Church and to enable third parties to contact relevant office holders.
  - 4.4.5. to keep and maintain records of employees and volunteers and manage our relationships with them.
  - 4.4.6. to carry out our activities, from weddings and funerals to general pastoral and spiritual care.
  - 4.4.7. to process payments to you for remuneration and reimbursement purposes.
  - 4.4.8. to process donations that you may make to us or other payments where, for example, you hire facilities belonging to the Diocese.
  - 4.4.9. to administer, support, improve and develop the administration of the Diocese's work and operations and to keep the Diocese's or any parish's accounts and records up to date. This covers the maintenance of church premises, tax records, Gift Aid, audits and records of meetings.
  - 4.4.10. to process applications from you, including grant applications and applications for a role within the Diocese.
  - 4.4.11. to identify potential additional sources of fundraising such as identifying those eligible to make Gift Aid nominations and other forms of wealth screening.
  - 4.4.12. for audit and statistical purposes (e.g., for the periodic audit undertaken by the Catholic Safeguarding Standards Agency).
  - 4.4.13. to ensure we comply with our legal obligations (e.g., by providing information to the Charity Commission or HMRC or carrying out safeguarding activities).
  - 4.4.14. in the case of CCTV recordings, to prevent or detect crime, and to help create a safer environment for our employees, parishioners, and visitors.
  - 4.4.15. to livestream Masses and other church celebrations to assist those who cannot attend – these may be viewed via the internet anywhere in the world.
  - 4.4.16. to address and respond to any reports of abuse we may receive in accordance with our safeguarding procedures.
  - 4.4.17. to address and respond to any complaints we may receive in accordance with our complaints, procedures.

- 4.5. Any information gathered through **cookies and similar technologies** via the Diocesan website or the website of any parish, is used to measure and analyse information on visits to the website, to tailor the website, to make it better for visitors and to improve technical performance. We will not use the data to identify you personally or to make any decisions about you.

#### **Change of purpose**

- 4.6. We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact the Data Protection Officer.
- 4.7. If we need to use your personal data for unrelated purposes, we will notify you and we will explain the legal basis which allows us to do so.
- 4.8. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **5. THE LAWFUL BASIS FOR PROCESS YOUR PERSONAL DATA?**

- 5.1. We must have a **lawful basis for processing** your information; this will vary according to the circumstances of how and why we have your information, but examples include:
  - 5.1.1. the activities are within **our legitimate interests** in advancing and maintaining the Roman Catholic religion, in providing information about the activities of the Diocese or any Diocesan parish, and to raise charitable funds (e.g. where we use baptism data to follow up with families for first communion).
  - 5.1.2. you have **given consent** (which can be withdrawn at any time by contacting us using the details listed in section 9.1) for us to process your information (e.g. to send you promotion or fundraising communications by email or SMS).
  - 5.1.3. where we are carrying out necessary steps in relation to a **contract** to which you are party or prior to you entering into a contract (e.g. employment contract, or where you enter into a hire agreement for one of our facilities).
  - 5.1.4. the processing is necessary for **compliance with a legal obligation** (e.g. where we pass on information to a local authority for safeguarding or other reasons).
  - 5.1.5. the processing is necessary for carrying out a task in the **public interest** (e.g. updating and maintaining the register of marriages).
  - 5.1.6. to protect your **vital interests** (e.g. where there is a risk of death or serious injury to that person or another individual then we may pass on information to the Police or NHS for treatment purposes).
- 5.2. If we **process any special categories of personal data** (described in section 3.3.14) we must have a **further lawful basis** for the processing. Provided that the legal basis is proportionate to the aim pursued and provides for suitable and specific measures to safeguard your rights, or as part of our legitimate interests as a Roman Catholic diocese and charitable institution, this may include:
  - 5.2.1. where you have given us your **explicit consent** to do so (e.g. to cater for your medical or dietary needs at an event).
  - 5.2.2. where the processing is necessary to protect your **vital interests** or someone else's vital interests (e.g. where there is a risk of death or serious injury to that person or another individual).

- 5.2.3. where the processing is carried out with appropriate safeguards in the course of our **legitimate activities** as a Roman Catholic diocese working with and supporting our current and former parishioners who have regular contact with the Diocese in connection with the Diocese's purposes (e.g. carrying out parish administration, church activities or pastoral care), and the information is not shared outside the Diocese other than with your consent.
- 5.2.4. the information is **manifestly public** (e.g. the religious beliefs of a member of clergy) and/or you have made the information public.
- 5.2.5. where the processing is necessary for the establishment, exercise, or defence of **legal claims**.
- 5.2.6. where the processing is necessary for carrying out the Diocese's **employment and social security obligations**.
- 5.2.7. the processing being necessary for reasons of **substantial public interest** (e.g. where steps are taken to prevent fraud or other dishonest activity).
- 5.3. If we **process any personal data comprising criminal convictions or offences**, we must also have a further lawful basis for the processing. This may include:
  - 5.3.1. where the Diocese is exercising obligations or rights which are imposed or conferred by law on us or you in connection with **employment, social security or social protection** and the Diocese has a relevant policy document in place (e.g. to undertake appropriate checks on individuals prior to taking up a role).
  - 5.3.2. where it is necessary for the **prevention or detection of an unlawful act** (e.g. passing on information to the Police or other investigatory body).
  - 5.3.3. where the Diocese is **complying with or assisting others to comply with regulatory requirements** relating to unlawful acts or dishonesty (e.g. passing on information to the Police or other investigatory body).
  - 5.3.4. where it is carried out in the course of **safeguarding children or other individuals at risk** (e.g. making a safeguarding disclosure).
  - 5.3.5. where an individual has given their **consent** to the processing.
  - 5.3.6. where the Diocese is establishing, exercising, or defending **legal claims** (e.g. providing information to our insurers or lawyers in connection with legal proceedings).
  - 5.3.7. where it is necessary to protect the **vital interests** of an individual (e.g. passing on information to the Police where there is a risk of death or serious injury to that person or another individual).
  - 5.3.8. where it is carried out in the course of the Diocese's **legitimate activities** as a not-for-profit body with religious aims (e.g. carrying out pastoral activities).

## 6. SHARING PERSONAL DATA

- 6.1. We will only use your personal data within the Diocese **for the purposes for which it was obtained**, unless you have explicitly agreed that we may share your personal data with another organisation or unless we are otherwise permitted or required to under Data Protection Laws or order of a Court or other competent regulatory body or as set out in this Statement.
- 6.2. We may share your information with other members of the Church seeking relief and **any ecclesiastical body enjoying canonical jurisdiction or powers of governance as detailed in the Code of Canon Law** or the Apostolic Constitution *Pastor Bonus*.

- 6.3. We may share your information with **government bodies** for tax purposes or **law enforcement agencies** for the prevention and detection of crime.
- 6.4. As a registered charity, we may share your information with **our regulators**, the [Charity Commission for England and Wales](#), the [Jersey Charity Commissioner](#) and the [Guernsey Registry](#).
- 6.5. If there is information which is relevant to **our insurance**, we may need to share your personal data with our insurance brokers, the **Catholic Insurance Service Ltd**, (whose privacy notice can be found [here](#)), insurers and legal advisors.
- 6.6. In respect of other **legal matters**, we may need to share your personal data with our solicitors and legal advisors.
- 6.7. In respect of **safeguarding matters**, we may share your personal data with the **Catholic Safeguarding Standards Agency**, (whose privacy notice can be found [here](#)). If we receive a report of abuse, we may decide to appoint an individual from outside the Diocese to undertake an investigation or assessment and to advise us on appropriate action to take. Where we believe it is necessary to do so, we will also share personal information with appointed investigators/assessors and with the statutory authorities, such as the police or local authority.
- 6.8. Sometimes the Diocese contracts with **third parties** whom we ask to process personal data on our behalf (such as IT consultants, distributors of parish newsletters and directories, fundraising partners). We require these third parties to comply strictly with our instructions and with the UK GDPR. A current list of the third parties with whom we share is available on request.
- 6.9. We also may be required to share your personal data so that the Diocese can benefit from **Gift Aid** nominations you have made e.g. with HMRC.
- 6.10. In the course of processing your personal data, or disclosing it to the recipients referred to above, we may **transfer it to countries which are outside the UK**, some of which may not have laws which provide the same level of protection to your personal data as laws inside the UK. In such cases we will take steps to ensure that the transfers comply with the UK GDPR and that your personal data is appropriately protected. We do so by taking the following measures:
  - 6.10.1. putting in place a contract of binding corporate rules, the Information Commissioner's Office (ICO) International Data Transfer Agreement and/or the ICO Addendum or standard contractual clauses for EU Citizen data with the recipient, which means that they must protect personal information to the same standards as is required in the UK.
  - 6.10.2. transferring it to a non-UK country with privacy laws that have been deemed adequate and provide the same protection as the UK.
  - 6.10.3. transferring it to a country that has an adequacy decision that allows data transfers (such as Guernsey and Jersey, see [ICO website](#) for more details).
  - 6.10.4. transferring it to organisations or countries that have other approved certification schemes or codes in place.
  - 6.10.5. relying on another appropriate ground under applicable data protection laws.

## 7. DATA SECURITY

- 7.1. We have in place reasonable and appropriate administrative, security, technical, and physical measures designed to guard against and minimise the risk of loss, misuse or unauthorised processing or disclosure of the personal data that we hold. Every member of the Diocese has a responsibility to uphold and abide by these measures.



- 7.2. Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidential and secure.
- 7.3. We have put in place reasonable and appropriate procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **8. PERSONAL DATA RETENTION**

- 8.1. We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
- 8.2. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
- 8.3. Details of retention periods for data processed by Diocese are available on request from the Diocesan Governance Team (see contact details in section 12)
- 8.4. In some circumstances you can ask us to delete your data: see Section 9 below for further information.
- 8.5. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **9. YOUR LEGAL RIGHTS**

- 9.1. You have the following rights in respect of the personal data you provide to us:
  - 9.1.1. the right to **request a copy** of some or all of the personal data that we hold about you (including, in some cases, in a commonly used, machine-readable format so that it can be transferred to other data controllers). Commonly known as a data subject access request, this enables you to check what we hold about you and that we are lawfully processing it. A copy of the relevant Data Subject Access Request form is available from the Diocesan Governance Team and our website.
  - 9.1.2. if we process your personal data on the basis that we have your consent, we have the right to **withdraw that consent**. However, this will not affect the lawfulness of any processing carried out using an alternative legal basis such as performance of a contract or legal obligation.
  - 9.1.3. the right to ask that **any inaccuracies** in your personal data are **corrected**. We may need to verify the accuracy of the new data you provide to us.
  - 9.1.4. the right to have us **restrict the processing** of all or part of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
    - 9.1.4.1. if you want us to establish the data's accuracy.
    - 9.1.4.2. where our use of the data is unlawful, but you do not want us to erase it.
    - 9.1.4.3. where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
    - 9.1.4.4. you have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

- 9.1.5. the right to ask that **we delete your personal data** where there is no compelling reason for us to continue to process it. We may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- 9.1.6. the right to **object to us** processing your personal data. This may be where there is something about your situation which makes you want to object to processing on this ground as you feel it impacts your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- 9.1.7. the right not to be subject to legal or other significant decisions being taken about you on the basis of an **automated process** (i.e., without human intervention).
- 9.1.8. The right to **lodge a complaint** with the Information Commissioner's Office (see section 12.3 of this notice for details).

### **Limitations and exemptions**

- 9.2. These rights may be limited in some situations – for example, where we can demonstrate that we have a legal requirement to process your personal data. Exemptions exist under UK GDPR, particularly if the personal data we hold is subject to the prevention, investigation, detection or prosecution of a criminal offence.

### **What we may need from you**

- 9.3. We may need to request specific information from you to help us verify your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.
- 9.4. Also, we may need you to provide us with proof of identity for verification and data security purposes before you can exercise your rights.

### **Exercising your rights**

- 9.5. Rights may only be exercised by the individual whose information is being held by the Diocese or with that individual's express permission. Children from approximately 12 years and older are entitled to make their own requests (where the Diocese is of the reasonable view that they have an appropriate understanding of the request they are making) and parents / guardian / family members do not have an automatic right to see information about their child or prevent their child from making a request to the Diocese.

### **No fee usually required**

- 9.6. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **Time limit to respond**

- 9.7. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 10. INFORMATION ABOUT OUR USE OF COOKIES

- 10.1. Our website and those websites we host for parishes use cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.
- 10.2. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.
- 10.3. The law states that we can store cookies on your device if they are strictly necessary for the operation of this site. For all other types of cookies, we need your permission.
- 10.4. Based on ownership there are in-house cookies and third-party cookies. In-house cookies are set and managed by us, while third party cookies are set and managed by websites other than ours. Third party cookies include but are not limited to Google, Facebook, Instagram, Twitter, and YouTube.
- 10.5. We use the following cookies:
  - **Strictly necessary/Essential cookies.** These are cookies that are required for the operation of our website.
  - **Analytical/performance/functional cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it so we can measure and improve performance. These are used to recognise you when you return to our website and help us to personalise our content and remember your preferences.
  - **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website, and any advertising displayed on it, more relevant to your interests. We may also share this information with third parties for this purpose.
- 10.6. You can find more information about the individual cookies we use and the purposes for which we use them in our Cookie Policy.
- 10.7. You can set your cookie preferences when you first visit our site. Options will be provided to accept or deny all listed cookies, or specific sub-categories of cookies only, or to accept only the strictly necessary/essential cookies required for our website to function.
- 10.8. You can change your cookie preferences at any time by visiting our home page and by clicking on the **change your cookie consent button/icon**.

## 11. CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORMATION

- 11.1. This version of our Privacy Statement was last updated on 01 April 2025. The latest version of the version will always be available on our website.
- 11.2. We may make changes to this Notice from time to time as our organisational practices and/or to ensure compliance with data protection legislation and best practice. We will not make any use of your personal information that is inconsistent with the original purpose(s) for which it was collected or obtained (if we intend to do so, we will notify you in advance wherever possible) or otherwise than is permitted by data protection laws.
- 11.3. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with the Diocese.

## 12. CONTACT DETAILS

- 12.1. If you have any questions, require further information about how we protect your personal data, if you wish to exercise any of your rights or if you would like to provide feedback or make a complaint about the use of your information, please contact the: Data Protection Officer and Diocesan Governance Team by email at [gdpr@portsmouthdiocese.org.uk](mailto:gdpr@portsmouthdiocese.org.uk) or by post to St Edmund House, Bishop Crispian Way, Portsmouth, PO1 3QA.
- 12.2. Any complaints will be dealt with in accordance with [the Diocesan Policy for Complaints \(non-safeguarding\)](#).
- 12.3. We hope that we can satisfy any queries you may have about the way in which we process your personal data. You have the right to make a complaint at any time to the [Information Commissioner \(ICO\)](#) Office by phone on 0303 123 1113 or their data protection and personal information complaints tool [here](#). We would, however, appreciate the chance to deal with your concerns before you approach the ICO.

## TERMINOLOGY

<b>Charitable Purposes</b>	The purposes set out in a charity's governing document. A charity must pursue and act within its purposes. Purposes were previously referred to as objects.
<b>Data Controller</b>	<p>A person, organisation or body that determines the purposes for which, and the manner in which, any Personal Data is processed. The Diocese is the sole Data Controller, and this includes all Processing of data that is carried out by any Diocese member including curial offices, parishes, departments, and agencies.</p> <p>The Diocese, as Data Controller, is responsible for complying with the Data Protection Rules and establishing practices and policies in line with them.</p>
<b>Data Processor</b>	Any person, organisation or body that processes personal data on behalf of and on the instruction of the Diocese (e.g., a contractor). Data processors act on the instructions of the Data Controller and have a duty to protect the information they process by following the Data Protection Rules
<b>Data Protection Impact Assessment (DPIA)</b>	<p>A process designed and required to help organisations systematically analyse, identify and minimise the data protection risks of a project or plan.</p> <p>A DPIA is required prior to undertaking any Processing of Personal Data that is likely to result in a high risk for the rights and freedoms of individuals.</p>
<b>Data Protection Officer (DPO)</b>	An individual employed or contracted to the Diocese who is responsible for ensuring day-to-day compliance with this Policy and the Data Protection Rules.
<b>Data Subject</b>	A living individual about whom the Diocese processes Personal Data and who can be identified from the Personal Data. A data subject need not be a UK national or resident. All data subjects have legal rights in relation to their Personal Data and the information that the Diocese holds about them.
<b>Diocese</b>	The Catholic Diocese of Portsmouth, registered charity number 1199568 (England), 457 (Jersey), CH236 (Guernsey), and any of its trading subsidiaries or any special trusts of which it is trustee.
<b>Information Commissioner's Office (ICO)</b>	<p>An executive non-departmental public body that reports directly to the Parliament of the UK, responsible for enforcing a range of laws that regulate communications, networking and data protection in the UK.</p> <p>The ICO enforces the UK's General Data Protection Regulation (GDPR), which is a set of rules that aim to protect the privacy and personal data of individuals in the UK. The ICO also handles complaints, investigations, audits, and education campaigns related to information rights and data protection.</p>

<p><b>Personal Data</b></p>	<p>Any information relating to a living individual who can be identified from that information or in conjunction with other information, which is in another's possession, or is likely to come into possession.</p> <p>Personal Data can be factual (such as a name, address, or date of birth) or it can be an opinion (e.g., a performance appraisal). It can even include a simple email address.</p> <p>A mere mention of someone's name in a document does not necessarily constitute Personal Data, but personal details such as someone's contact details or salary (if it enabled an individual to be identified) would fall within the definition. An item of personal data can belong to more than one data subject if they are both/all identifiable</p>
<p><b>Processing</b></p>	<p>Any activity involving the use of Personal Data. It includes obtaining, recording, or holding the information or carrying out any operation or set of operations on it, including organising, amending, retrieving, using, disclosing, erasing, or destroying it. Processing also includes transferring or disclosing Personal Data to third parties</p>
<p><b>Special Categories of Personal Data</b> (previously called <i>sensitive personal data</i>)</p>	<p>Information about a person's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health or condition, or data concerning a natural person's sex life or sexual orientation. It also includes the processing of genetic and biometric data for identification.</p> <p>Special Categories of Personal Data can only be processed under strict conditions and such processing will usually, although not always, require the explicit consent of the data subject</p>
<p><b>Third-Party</b></p>	<p>Any individual or organisation you come into contact with during the course of your work (whether paid or volunteer) with us. It may include actual and potential suppliers, parishioners, clients, business contracts, agents, advisers, donors, and government and public bodies, including their advisors, representatives, politicians, and political parties.</p>
<p><b>Trustee Board or Board of Trustees</b></p>	<p>Trustees of the Catholic Diocese of Portsmouth, registered charity number 1199568 (England), 457 (Jersey), CH263 (Guernsey).</p>