



# TRUST DATA PROTECTION & PRIVACY POLICY



## THE IRISH PILGRIMAGE TRUST

CHARITY REVENUE NUMBER CHY5992  
CHARITY REGISTRATION NUMBER 20009953

Date	Version	Description	Author	Approved
08 Sep 2022	1.0	Trust Data Protection and Privacy Policy - Adapted	B Connolly	11/6/2022

### Objects of The Irish Pilgrimage Trust:

*We bring people with additional needs on pilgrimage holidays to Lourdes and on holiday in Ireland and we fundraise to cover their costs*

## **NOTES:**



# Irish Pilgrimage Trust

## Data Protection and Privacy Policy

Information for you about how we look after personal information.

### **1. Introduction**

Protecting personal information is important to The Irish Pilgrimage Trust. We gather information from our employees and from volunteers and young people who travel with us to Lourdes or who stay in our houses in Ireland. The Irish Pilgrimage Trust gathers and processes your personal information in accordance with this privacy notice and in compliance with the relevant data protection regulation and laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your data.

### **2. Charity Information**

The Irish Pilgrimage Trust (formerly IHCPT) has been in existence in Ireland since 1972. We are a charitable trust run by a Voluntary board of Trustees, employing 4 staff members at our registered offices in Kilcuan, Clarinbridge, Co Galway H91 W596.

We bring young people with special needs to Lourdes at Easter each year for 7 days. We also have young people and adults with additional needs travelling in groups over the Summer to stay in Hosanna House outside Lourdes. We have 2 holiday homes for families and groups of people with special needs in Ireland and our volunteers offer Friendship Week breaks over the Summer for people with special needs.

Our Data Protection officer is James McHugh who can be contacted by writing to him at the above address or at [jmchugh@irishpilgrimagestrust.com](mailto:jmchugh@irishpilgrimagestrust.com) or by phoning our office at +353 91 796622.

We are a registered charity under the Revenue and our revenue number is CHY5992. The Irish Pilgrimage Trust is also regulated by the Charities Regulatory Authority and our Charity Registration Number is 20009953. Our accounts are audited each year and a copy submitted to the Charities Regulatory Authority.

### **3. Scope of this Policy**

This policy explains how we use your personal data. This includes how it is collected, how it is held and how it is processed. It also explains your rights under the law relating to your personal Data. This policy is intended for the young people who avail of our pilgrimages and our holiday and their families; for our volunteers throughout the country and for our staff.

#### **4. What is Personal Data**

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘ any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

In simpler terms, it is any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in part 6, below.

#### **5. Protecting your information.**

We are committed to protecting your personal data in accordance with article 32 of the GDPR and we will maintain appropriate technical and organisational security measures to protect your data against any unauthorised or unlawful processing and against any accidental loss, destruction or damage. We are committed to assessing potential risks on an on-going basis arising from our data processing activities, taking into account the means that are used now and in the future (technology, resources, service providers, etc.) and any other circumstances which may have an impact on data security.

#### **6. Data we collect**

In order to provide holidays and pilgrimage holidays for young people and adults with special needs, we need to collect a number of categories of personal data from young people with special needs and their families and guardians or other carers and from volunteers who care for these young people on our behalf. We require volunteers to supply two referees. We also collect data for all those who participate in our biennial cycle including cyclists and those on backup.

Depending on your relationship with us, these personal data categories may include Name, Address, Date of Birth, contact details such as telephone number, mobile phone number, email address, passport and EHIC details and school/training course information as well as medical information.

#### **7. How we use your information**

Under the GDPR, we must always have a lawful basis for using personal data. We will use your personal data to provide holidays to young people with special needs and to safeguard the young people and the volunteer carers and the staff involved in providing these breaks.

## 8. Retention of your information

In the event that you travel with the trust, we need to retain your data because it may be required in the event of an incident or claim being brought to light after the holiday/pilgrimage.

In the event that you do not travel with the Trust and you are not placed on standby for a subsequent year we will retain your data two years after the date of the holiday/pilgrimage that your application was unsuccessful for. In the event that you travelled with the trust in the past the need for data retention arising from your previous holiday/pilgrimage will stand.

## 9. Your rights regarding personal data

Under the GDPR you have a number of important rights regarding the way we process your personal data. These rights are outlined below.

**Right of access.** If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (subject to applicable exemptions). This is known as a “subject access request” (SAR). All subject access requests should be made in writing and sent to the email or postal address shown in Part 2 of this policy. To help us better deal with your request please provide us with the information necessary to identify you and to identify the personal data you require. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible. This form can be downloaded from [www.irishpilgrimagetrust.com](http://www.irishpilgrimagetrust.com).

There is normally no charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

**Right to rectification.** If the personal data we hold on you is inaccurate or incomplete you have the right to rectify such personal data and we would encourage you to ensure the personal data we hold on you is kept as up to date and accurate as possible. If at any time there is a change to your personal data, please advise us by contacting our office using the details provided in part 2 of this document.

**Right to Erasure.** In certain circumstances you have the right to request the deletion of your personal data where there is no compelling reason (e.g. a regulatory requirement for us to retain it) for us to continue processing it.

**Right to restrict processing.** In certain circumstances you can request the restriction of the processing of your personal data where you contest the accuracy of the information; where you object to processing which is based on legitimate interests; where the processing is unlawful and you wish to restrict the processing rather than seek erasure; or where we no longer require to retain your personal data but you wish the personal data to be held while you establish, exercise or defend a legal claim.

**Right to data portability.** You can request to receive your personal data, which you provided to us, in a structured, commonly used and machine-readable format and have the right to transmit this data to another controller.

**Right to withdraw consent.** If we are processing your personal data on the legal basis of consent you have the right to withdraw your consent at any time. If you withdraw your consent we will no longer be able to carry out processing based on your consent. However by withdrawing your consent it does not invalidate any processing which was undertaken prior to the withdrawal of your consent.

**Right to object to processing.** You have the right to object to processing based on legitimate interests. Where we have indicated that we are processing your personal data based on legitimate interest you are entitled to such processing on grounds relating to your particular situation. We will stop processing your personal data unless we can demonstrate compelling legitimate grounds for the processing which overrides your interests, rights and freedoms or where the processing is necessary for the establishment, exercise or defence of legal claims.

Note that when you or your child apply to join the Trust as a volunteer or as a guest the processing of your information will become a condition of the contract between us as we require certain information in order to be able to provide you with our service. If you do not wish us to process your information we may be unable to provide our service to you.

**Right to lodge a complaint with Data Protection Commissioner.** If you are not happy with the way that we deal with and process your data, we would encourage you to contact our privacy officer by using one of the methods detailed in part 2 of this policy. However, you also have the right to lodge a complaint with the Data Protection Commissioner by emailing [info@dataprotection.ie](mailto:info@dataprotection.ie) or writing to the Data Protection Commissioner, Canal House, Station Road, Portarlinton, R32 AP23 Co Laois.

If you are resident in Northern Ireland, you can email [ni@ico.org.uk](mailto:ni@ico.org.uk) or write to The Information Commissioner's Office – Northern Ireland, 3rd Floor, 14 Cromac Place, Belfast BT7 2JB.

## **10. Changes to this policy notice**

This Statement will be regularly reviewed as part of our Management Review Process to ensure we continue to meet our obligations in processing your personal data and protecting your privacy. In order to do so we reserve the right to update, modify and amend this Statement at any time as required. We would recommend that you check back regularly to keep informed of any updates. We will not make any significant changes to this policy without informing you. The data and issue of this Private Policy is detailed on page 3 of this document. You can view the latest version of this document at any time on [www.irishpilgrimage.com/privacy](http://www.irishpilgrimage.com/privacy).