



MARIST SISTERS GENERALATE CIO

Registered charity number: 1179883

55 Thetford Road, New Malden KT3 5DP England

Privacy Notice

Date of last review: 6th April 2024

Date of next review: April 2025

Review period: 1 year

Person responsible: General Bursar

About this privacy notice

Marist Sisters Generalate CIO (the 'Charity') is committed to protecting and respecting your privacy.

This privacy notice sets out why we collect personal information about you and how we use that information. It explains the legal basis for this and the rights you have over the way your information is used.

If you have any questions about this privacy notice or concerning your personal information please contact the Secretary General at secgensm@gmail.com or by post to Marist Sisters, 55 Thetford Road, New Malden, Surrey KT3 5DP England

About us

For the purposes of the Data Protection Act 2018 and the General Data Protection Regulations (GDPR) the Controller of your personal data is the Charity. We are registered with the Information Commissioner's Officer under registration number ZA767040.

The Charity is a charitable incorporated organisation (CIO) registered with the Charity Commission for England & Wales under number 1179883 with the following objects:

The object of the CIO is the advancement of the Roman Catholic religion through the religious and other charitable work of the Congregation as the Trustees with the approval of the Congregational Leader shall from time to time think fit.

The personal data we collect

The type and amount of information we collect depends on why you are providing it. We will collect your personal data from you directly.

Trustees

We process personal data relating to those who are trustees of the Charity for governance purposes. In order that you can carry out your trustee duties, we need to contact you so that we can give you the necessary papers and notices in respect of upcoming trustee meetings and other meetings and events. We are also required under charity law to provide certain information to the Charity Commission about the Charity's trustees, as well as maintaining a statutory register of trustees.

The personal data we collect about you includes identifiers including name, contact details, date of birth, details of other trustee appointments, declaration of eligibility to act as a trustee.

Grant applicant contacts

The Charity will obtain details about you if you are the named point of contact applying for a small grant from the Marist Solidarity Fund. The application form asks for your name and which Unit you are from. The Charity may also ask for your email address and telephone number when working with you to consider your application. We need to collect this information from you so that we can liaise with you in respect of your grant proposal. Similarly, if you are the project supervisor relating to the application for funding we will also obtain your name through the application form.

As well as the information we collect through the application form, we might also contact each other by email, on the phone or by post. Therefore, we may hold email or other correspondence with you if you enquire about applying for a grant or enquire about a current or former application for a grant.

It is necessary for us to collect the information outlined above to consider your eligibility for a grant, to process and administer the grant application, and to communicate with you about the grant programme. If you do not provide the requested information, we may be unable to process your grant application.

Organisation contacts

In the course of operating the Charity we will also collect personal details of contacts at our suppliers in order that we can contact them to deliver a service for us. Generally these details are provided in the course of business.

Our legal basis for processing your information

Data protection law requires us to have a legal reason for processing your personal data. Depending on the purposes for which we use your data, one or more of the legal reasons listed below may be relevant.

Lawful basis: legitimate interest

Examples of where the use of your information is lawful on the basis of legitimate interests are:

- In administering a grant application that you have submitted; liaising with you in respect of the application; conducting the necessary due diligence on our grant applicants; and monitoring the expenditure of the grant;
- In liaising with our suppliers.

In establishing the legitimate interest legal basis, we have weighed up your rights as an individual against the requirements of the Charity.

You have the legal right to object to us processing your personal data on the lawful basis of legitimate interest. To learn more about how to exercise that right please see the section below, “Your Rights”.

Lawful basis: legal obligation

We may need to collect, process and disclose personal data in order to comply with a legal obligation. For example:

- The Charity is legally required to hold grant transaction details for accounting/tax purposes.
- The Charity is legally required to carry out appropriate due diligence and monitoring on grant applicants to ensure that we are operating within the objects for which the Charity was established, as well as within our wider charity law duties.
- The Charity is legally required to retain and provide some trustee details to the Charity Commission.

Lawful basis: consent

There may also be instances where we need your explicit consent to collect and use your personal data. We will make it clear when we need your consent to use your personal data. Where we do rely on your consent to use your personal data, you have the right to withdraw that consent at any point in time and you can do that by contacting the Secretary General at secgensm@gmail.com.

Who we might share your personal data with

We will not sell, exchange or rent your personal data with any third party for marketing purposes. We may however disclose your information for the following purposes:

- **The Congregation:** Official documentation is required to be held at the Marist Sisters General House in Rome and so the details of the Charity’s trustees and copies of the grant applications containing the names of the applicants may also be held on file at The General House.
- **To third-party service providers:** Such a relationship is regulated by GDPR. Service providers would be contractually required by us to keep your personal data secure and only process it on our behalf and only in accordance with our strict instructions.

- **For risk or regulatory purposes:** with companies providing services for money laundering and terrorist financing checks, credit risk reduction and other fraud and crime prevention purposes and companies providing similar services, including financial institutions, credit reference agencies and regulatory bodies with whom such personal data is shared.
- **To comply with our legal obligations:** with third party Controllers with whom we have a legal obligation to disclose your personal data such as HMRC.
- **Third parties in connection with restructuring or reorganisation of our operations:** For example, if we restructure the Charity or merge with another charity.

Transfers of your information to other countries

Because of the nature of the Charity's position within the wider Congregation, we may transfer your information to countries or territories outside the UK and / or the European Economic Area (EEA) which do not provide the same level of data protection as the country in which you reside and are not recognised by the European Commission as providing an adequate level of protection for personal data. For example, we may need to transfer your information to other Units based in other countries if they are assisting in administering the grant that you have applied for.

We ensure that any transfer of your personal data is adequately protected and secure by ensuring that it is subject to appropriate safeguards as prescribed by GDPR. For example, in certain cases, we may choose to only transfer your personal information to third parties that are based in countries that have been approved by the European Commission or such other relevant regulatory authority in the UK, as providing adequate protection for personal data. Alternatively, we may require that the transfer is subject to standard contractual clauses that are approved by the European Commission as providing adequate protection for personal data. For more information about this please contact us.

How we keep your information safe

We understand the importance of security of your personal information and take appropriate steps to safeguard it.

We always ensure only authorised persons, principally our trustees, have access to your information and all have the appropriate training to manage your information.

However, security of transmission of data over the internet cannot be guaranteed to be 100% secure. So, whilst we take appropriate technical and organisational measures to protect your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed, we cannot guarantee the security of any information you provide online and you do this at your own risk.

If you would like more information about the security measures we have implemented please contact us.

We have also put in place 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.

Keeping your information up to date

We really appreciate it if you let us know if your contact details change. For example, if you change your email address or if you wish to cancel any request you have made of us, or if you become aware we have any inaccurate personal data about you, please let us know by sending an email to the Secretary General at secgensm@gmail.com. We will not be responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete personal data that you provide to us.

How long we keep your information for

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 and, where required for us to assert or defend against legal claims, until the end of the relevant retention period or until the claims in question have been settled.

By way of example, we hold records of trustee details for as long as a trustee serves on the board plus 12 months so we can fulfil our statutory obligations for charity law purposes.

If you would like more information about how long we keep your personal data, please contact the Secretary General at secgensm@gmail.com.

Your Rights

You have various rights with respect to our use of your personal data:

- **Access:** You have the right to request a copy of the personal data that we hold about you together with other information about how we use that information. This is usually referred to as making a Data Subject Access Request. There are exceptions to this right, so that access may be denied if, for example, making the information available to you would reveal personal data about another person, or if we are legally permitted to refuse all or part of your request.
- **Accuracy:** the right to request rectification of information that is inaccurate or out of date.
- **Objecting:** In certain circumstances, you have the right to object to processing of your personal data and to ask us to block, erase and restrict processing of your personal data. For example, you have the right to object where we process your personal data for the legal reason that it is necessary for our, or a third party's legitimate interests.

- **Porting:** the right to request that some of your personal data is provided to you, or to another data controller, in a commonly used, machine-readable format.
- **Erasure:** the right to erase your personal data where it is no longer necessary for the purposes for which it was collected, or when, among other things, your personal data has been unlawfully processed.
- **Automated Decision Making and Profiling:** rights in relation to automated decision making and profiling.

Some of your legal rights are subject to safeguards, limitations or exemptions.

To exercise any of your legal rights, please contact:

The Secretary General
Marist Sisters,
55 Thetford Road,
New Malden,
Surrey KT3 5DP
England

Or

secgensm@gmail.com

Or telephone ++39 06 3936 6532

Complaints: If you believe that your data protection rights may have been breached, you have the right to lodge a complaint with the Information Commissioner's Office, or to seek a remedy through the courts.

Changes to this Privacy Notice

We will update and change this Privacy Notice from time to time to reflect changes to the way we handle your personal data or changing legal requirements. Any changes we may make to our Privacy Notice in the future will be notified to you by email.