

# **The Union of the Sisters of Mercy of Great Britain**

## **Protecting your Privacy**

### **Privacy Notice**

#### **Who we are**

The Union of the Sisters of Mercy of Great Britain (Mercy Union) is a congregation of Roman Catholic Sisters of Mercy, one of three strands of the Sisters of Mercy Order in Great Britain. We are a registered charity with charity number 288158 (in England and Wales) and SC039153 (in Scotland).

The objects of the charity are the promotion of religion and education in accordance with the doctrines of the Roman Catholic Church or any other charitable purpose which shall advance the religious, educational and other charitable work carried on, directed or supported by us.

The Union of the Sisters of Mercy decides what personal data we hold, how we hold it and how we use it. This makes us responsible for that data as a “data controller”. The Union is registered as a Data Controller with the Information Commissioner’s Office (ICO) under registration number ZB811998. The Union is committed to ensuring that the privacy of members, staff, users of our services and website users is protected under the UK GDPR, the Data Protection Act 2018 & The Privacy and Electronic Communications Regulations (PECR). This notice discloses our policies for processing your personal data/information.

#### **What is “personal data” and what does “processing” mean?**

“Personal data” means any information relating to a living individual who can be directly or indirectly identified from that information. The “processing” of personal data means collecting, recording, organising, storing, sharing, destroying or anonymising personal data.

#### **How do we collect your personal data?**

We may collect personal data about you in any of these ways:

- When you apply for a job with us;
- When you are a staff member or volunteer;
- When you are engaged by us as a contractor and supply services to us;
- When you visit one of our properties as a guest or delegate;
- When you are a resident at our care home;
- When you are our tenant;

- When you are a member;
- When you are a supporter or volunteer;
- When you access our website;
- When you contact us, request information or send us feedback.

We collect this personal data from you either directly (for example if you are an employee, volunteer, member or supporter) or indirectly (for example when you use our website).

We may also collect personal data about you from other sources such as:

- Former employers, if you apply to work with us;
- DBS check providers, if you are an employee or volunteer and work with adults at risk and/or children;
- Your relatives, friends or health or social care professionals, if you are a resident at our care home;
- Via our IT systems, for example, CCTV and access control systems.

## What type of personal data do we collect?

The personal data we collect about you depends on how you interact with us and the particular activities carried out by us. Such data may include:

- **Basic identity data** including your name, date of birth, gender and photographs;
- **Contact data** including your address, email address, telephone numbers and next of kin;
- **Financial data** such as your bank account and payment details, if you are an employee, purchase services from us or donate to us;
- **Recruitment information or employment records**, if you apply for a job or are an employee;
- **Health-related data** such as your health care and medical records, for example, if you are a resident at a care home, or as part of your employment records if you work for us;
- **Data revealing religious beliefs**, if you are a member or a resident at our care home;
- **Information revealed through a DBS check** including information about criminal convictions and offences, if you are a member, volunteer or staff member and you work or volunteer with children and/or adults at risk;

- **Other sensitive data (“special categories” of personal data)** you may have disclosed to us such as your racial or ethnic origin, political opinions, trade union membership, sexual orientation or genetic information and biometric data. Under data protection law, health-related data, data revealing religious beliefs and the other sensitive data listed above are all considered “special categories” of personal data. This data, as well as data concerning criminal convictions and offences, requires higher levels of protection and so is subject to tighter controls;
- **Feedback data** including notes of any conversations with you, and details of any comments or complaints you make.
- **Data collected on our website** - Our public website collects limited personal data in specific circumstances:
  - **Prayer Requests**  
If you choose to submit a prayer request, you may provide your first name and any other information you include in the prayer text. This data is stored within the website in order to display the prayer request as intended. Providing your name is optional.
  - **Members Area**  
The members area uses your email address for login and identification purposes only. No other personal data is collected or processed.
  - **Photographs**  
From time to time, we may display photographs on the website. These are only used with appropriate permission and are intended to illustrate our activities and community life. We will not publish identifiable images of individuals without their permission. If you would like a photograph of yourself removed from the site, please contact us.
  - **Website Analytics**  
We use Google Analytics to help us understand how the website is used. Google Analytics uses cookies to collect information and report site usage statistics without personally identifying individual visitors.
  - **Cookies**  
WordPress and Google Analytics cookies may be stored on your device when you visit the site. These cookies gather information to analyse website functioning, track user activity, and improve your browsing experience. Please see our cookie policy at <https://www.sistersofmercyunion.org.uk/cookie-policy-uk/>

**Carter and Co Creative (the website developers) are not responsible for the content within this Privacy Policy. We recommend organisations seek independent legal advice to ensure compliance with data protection laws.**

## Why do we use your personal data/information?

The Mercy Union may use your personal data to manage our functions across our various activities and locations, in the course of our legitimate activities, in order to function as a charitable and religious organisation. Depending on the circumstances, we may use your data so that we can:

- Make a decision about your recruitment or appointment;
- Perform and administer any contract we have entered into with you;
- Pay you or process any donations from you;
- Provide services to you, in our care home or elsewhere;
- Make sure you receive the training, support or care you need;
- Carry out our religious and other charitable work;
- Communicate with you when you engage with us;
- Improve, assess and evaluate our operations;
- Investigate any complaints;
- Verify your identity.
- **How we use your data on our website**
  - Prayer request information is used solely for the purpose of sharing your request on the website.
  - We do not use prayer request details for marketing or any other purpose.
  - You can request removal of your prayer submission at any time by contacting us.
  - Analytics and cookies are used only to improve website performance and user experience.

## What is our legal basis for processing your personal data?

We only use your personal data when we have a legitimate and legal reason for doing so. There are various different legal bases upon which we may rely, depending on what personal data we process and why. The legal bases we rely on most commonly include:

- **contract:** where our use of your personal data is necessary for a contract we have with you or will be entering into;

- **legal obligation:** where our use of your personal data is necessary for us to comply with the law;
- **legitimate interests:** where our use of your personal data is necessary to pursue our legitimate interests in a way which might reasonably be expected (that is, to pursue our aims of promoting religious and other charitable purposes) and in a way which does not materially impact your rights, freedoms or interests.

In a small number of cases, we may also rely on the following legal bases:

- **vital interests:** where our use of your personal data is necessary to protect your or someone else's life, typically in an emergency;
- **consent:** where you have given us clear consent for us to process your personal data for a specific purpose, where another legal basis cannot be used.

In relation to any “**special category**” **personal data** or data concerning criminal convictions and offences, we rely on different reasons to process your personal data. Most commonly these include that the processing is:

- necessary for the provision of health or social care services;
- necessary for carrying out our legal obligations relating to employment and social protection law;
- necessary in the substantial public interest, and further conditions are met;
- necessary for the establishment, exercise or defence of legal claims;
- carried out in the course of our legitimate activities and relates solely to our members or former members, and personal data is not disclosed outside of the Union of the Sisters of Mercy;
- carried out with your explicit consent.

If you have given your consent for us to process your personal data, you have the right to change your mind at any time and withdraw your consent by contacting us on the details given at the end of this notice.

## Who do we share your personal data with?

The Union of the Sisters of Mercy will not sell or rent any personally-identifiable information. We do, however, share your information with the following trusted partners who work on our behalf, and only where the law allows:

- support companies we use to help us run our operations, for example, IT, cloud storage and backup service providers, and our payroll provider, bank, website operator and insurers;

- vetting agencies (so that vetting searches may be made about you);
- your next of kin (in case you are taken ill or have an accident);
- health and social care professionals;
- other Sisters of Mercy organisations in Great Britain and around the world, including the Mercy International Association, for use in their online newsletter (to share details of our religious and charitable work).
- With regards to photos and “thank you messages”, with the Charity Commission, in our annual Trustees’ Report, available online, and also in our internal newsletter.

We will also share your personal data with third parties:

- if we are legally required to do so, for example, by a law enforcement agency or court;
- to enforce or apply any contract we have with you;
- if it is necessary to protect our rights, property or safety or to protect the rights, property or safety of others;
- for safeguarding reasons, where it is in the substantial public interest to do so, to protect children and adults at risk from neglect or physical, mental or emotional harm (including to their well-being);
- if we sell or buy any other organisation or part of it (including the Union of the Sisters of Mercy, if we are forming a new entity to replace and continue our operations or merging with another organisation), in which case we may disclose your personal data to the prospective seller or buyer so that they may continue using it in the same way.

## Storage of Personal Information

We have appropriate security measures in place to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine need to know it. Those processing your data will do so only in an authorised manner and are subject to a duty of confidentiality.

The Union of the Sisters of Mercy stores personal data in digital and hard copy formats depending on how the data was first collected. All of our computers and IT devices are password/ pin protected and hard copies of documents are contained under lock and key cabinets. We have backup solutions on our computer server to prevent data from being accidentally lost, and state of the art antivirus protection to prevent personal data being lost, stolen, damaged or amended outside the policies of the charity.

We will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting or reporting requirements.

Different retention periods apply for different types of data. At the end of the relevant retention period, your data will either be deleted completely, put beyond use or anonymised. Some data about members will be kept in perpetuity as a record of our history and heritage and a reflection of life at the Union of the Sisters of Mercy.

When appropriate, physical documents are destroyed by shredding and electronic documents are deleted from electronic systems. (No conscious over-writing of electronic media is conducted in the deletion process.)

### **Where your data is stored on our website**

Our website is hosted on servers in Australia. This means that any information you share with us through the site (such as prayer requests or your email address to log in) is stored outside the UK. Although Australia does not have the same data protection laws as the UK, we only use trusted service providers who apply appropriate technical and organisational measures to keep your information secure.

### **What are your data protection rights?**

You have the following rights under current Data Protection Law which you can exercise free of charge and on request:

- to access the personal data we hold about you;
- to require us to update or correct the personal data we hold about you;
- to require the erasure of your personal data in certain circumstances;
- to receive the personal data we hold about you in a structured, commonly used and machine-readable format, and to transmit it to a third party in certain situations;
- to object to the processing of your personal data in certain circumstances.
- to ask us to limit how we use your personal data.
- to challenge any automated decisions we make about you.

If you wish to exercise any of these rights, please contact the PA to the Trustees at [admin@mercyunion.org.uk](mailto:admin@mercyunion.org.uk) or on 020 7723 2527, and let us have enough information to identify you.

If you request the information that we hold about you, we will respond within one month, for free (unless the complexity and number of requests mean that we need more time).

## How to complain

We hope that we can resolve any query or concern you raise about our use of your personal data. If you remain dissatisfied after raising your concern with us, you have the right to complain to the Information Commissioner Office (ICO), the UK supervisory authority for data protection issues. The ICO can be contacted at <https://ico.org.uk/concerns/> on 0303 123 1113 or at their address:

**Information Commissioner's Office**  
**Wycliffe House**  
**Water Lane**  
**Wilmslow**  
**Cheshire**  
**SK9 5AF**

## Changes to this privacy policy

We keep this privacy notice under regular review and we will place any updates on this web page.

## How to contact us

Please contact the PA to the Trustees at [admin@mercyunion.org.uk](mailto:admin@mercyunion.org.uk) or on 020 7723 2527 if you have any questions about this privacy policy or the personal data we hold about you.