

## Who we are

Camp Creideamh is an apostolate of the Catholic Church that operates short faith camps for teenagers on a few occasions throughout the calendar year.

Camp Creideamh is a controller of certain personal data for the purposes of the General Data Protection Regulation (EU 2016/679 (the “GDPR”)).

Camp Creideamh is committed to ensuring that your personal data is properly and securely managed in accordance with the GDPR and the Data Protection Acts 1988 to 2018 (the “Acts”) and believes this is an important part of achieving trust and confidence between Camp Creideamh and those with whom it interacts. This policy is to let you know how Camp Creideamh will look after your personal data.

This policy relates to the website of [www.campcreideamh.ie](http://www.campcreideamh.ie) domain only. You may find links on our websites to other websites over which Camp Creideamh does not have control. Once you have used these links to leave this website, any information you provide to these third parties is not covered by this Privacy Policy.

In addition, Camp Creideamh may operate social media accounts on other websites for example, Facebook and Twitter. You will need to consult the privacy policies of those websites for information on how they use your personal data.

By using this site, you agree to the terms of this Privacy Policy.

## The type of information we have

The personal data which we hold relating to you may include the following: -

- Name and contact details of parents/guardians;
- Gender, age, date of birth, nationality;
- Postal Address;
- Information which we collect through your use of our website such as IP addresses, dates and times of site visits, type of browser and cookie information;
- Data relating to Garda vetting applications and disclosures;
- Data relating to safeguarding matters.

We may also collect and process the following special category personal data: -

- data about your race, ethnicity or religious beliefs;
- data about your health and wellbeing.

Our Safeguarding Office (Camp Creideamh utilises the Safeguarding Office of the Diocese of Cloyne, New Road, Mallow) may also process data relating to criminal convictions and offences.

## **How we collect the data we hold about you**

Camp Creideamh collects the data we hold about you in a number of ways:

1. When you access our website;
2. By you using the “contact us” facility on our website;
3. By you contacting Camp Creideamh by phone, email or letter and providing data to us;
4. Through face to face meetings with you;
5. When you attend Camp Creideamh training;
6. When you use the Garda Vetting service.

## **Why we process your data and the lawful basis for processing your data**

We must have a lawful basis for processing your data. The lawful basis will vary depending on the circumstances and the type of data involved. One lawful basis is where you have given your consent to us processing your data. (This consent can be withdrawn by contacting us.) Other examples are where the processing is necessary for one of the following: -

- our legitimate interests of advancing and upholding the Camp Creideamh apostolate;
- the performance of a contract to which you are a party;
- compliance with a legal obligation to which Camp Creideamh is subject;
- in order to protect your or another person’s vital interests (i.e. where there is a risk to life or serious health risk to you or another);

- the performance of a task carried out in the public interest.

The above are examples only, you will need to contact us for further information on the legal basis for processing your personal data.

We must have a different lawful basis for processing special category data. These are set out in the GDPR but here are some examples: -

- You have given us your explicit consent to processing the information;
- Processing is necessary for the purposes of our or your obligations and rights in employment, social security and social protection law;
- Processing is necessary to protect your or another person's vital interests (i.e. where there is a risk to life or serious health risk to you or another);
- Processing is carried out in the course of our legitimate activities of advancing and upholding the Camp Creideamh apostolate where the processing relates solely to our members or to former members and the personal data is not disclosed outside Camp Creideamh without your consent;
- Processing relates to personal data which you have made public;
- Processing is necessary for the establishment, exercise or defence of legal claims;
- Processing is necessary for reasons of substantial public interest;
- Processing is necessary for the purposes of preventive or occupational medicine;
- Processing is necessary for reasons of public interest in the area of public health;
- Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.

The above are examples only, please contact us if you require further information.

## **What we do with the information we have**

We use your information for a number of purposes including:

- in connection with our activities;
- to respond to queries and complaints;
- to communicate with you in relation to news about the activities, events and initiatives taking place relating to Camp Creideamh;
- to process application forms;
- as authorised or required by law;

- if you are a volunteer, to assess your suitability for the position you have applied for;
- to obtain and retain a Garda vetting disclosure, where required;
- to process safeguarding complaints in accordance with legal requirements;
- in the case of information gathered through cookies, to measure and analyse information on visits to the website. Information collected by cookies is not used to identify you personally.

## Who we share your data with

Where we feel it is necessary to share your personal data with a third party, such processing will be carried out in accordance with our obligations under the GDPR and the Acts. This means that we will either have your consent to processing your personal data in this way or there will be another lawful basis for doing so (see above under the heading “Why we process your data and the lawful basis for processing your data”).

## We may share your personal data with the following:

- Camp Creideamh volunteer team on a “need to know” basis;
- An Garda Síochána in relation to the detection or prevention of a crime;
- Other Governmental departments or statutory agencies as required by law;
- We may post camp photos or videos to Camp Creideamh website and/or social media pages for the purposes of promoting Camp Creideamh; this will be done only with parental consent which is obtained on the activity application form.

## How we store your information

We store your data in both manual and electronic format. We use the following technical and organisational measures to protect your personal data:

- We store your personal data on a secure server, access to the server is restricted to a limited number of staff;
- Manual files are kept in locked filing cabinets in the Camp Director’s office. There are no files in public areas and the offices are locked every evening;

- Access to computer systems is password protected;
- All documents containing personal data are shredded before being discarded;

While we use all reasonable endeavours to protect your personal data, the transmission of information via the internet is not completely secure. For this reason, we cannot guarantee the security or integrity of any personal data which is transferred from you or to you via the internet.

Transfer of your personal data outside the European Economic Area (“EEA”)

We do not usually transfer your data outside the EEA. However, there may be some limited circumstances where this is necessary. For example, where you are getting married in a country outside the EEA. Some of these countries do not have laws which provide the same level of protection to your personal data as laws within the EEA. We will either obtain your consent before transferring your personal data to such a country or otherwise transfer such data in accordance with the GDPR and the Acts.

## Your data protection rights

You have a number of rights under the GDPR and the Acts. These include the following:

1. 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;
2. Access – you have the right to be given a copy of all of your personal data on request;
3. Rectification – you have the right to have any inaccurate data held by us rectified free of charge;
4. 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;
5. Withdraw – where we rely on your consent to process your personal data, you can withdraw your consent
6. Object – you have the right to object to the processing of your personal data;
7. Erasure – you have the right to request us to delete your personal data, this is known as the “right to be forgotten”;

8. 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 Camp Creideamh or with that individual's express permission. We may request proof of identity for verification purposes before you can exercise any of these rights.

## **Cookies**

Our website uses cookies to help you in your interactions and to enhance your user experience. Cookies are small files placed on your computer's hard drive, or in your browser memory, when you visit our website. You can access our Cookies Policy [here](#).

We use Google Analytics to track user engagement and usage on our website. For further information see Google's Privacy Policy [here](#).

We also use privacy preferences. We use a tracking cookie, which is added to your computer, to remember your cookie preferences i.e. if you have allowed or disallowed them.

## **Changes to Policy**

Camp Creideamh reserves the right to review and amend this Privacy Policy at any time without notice and you should check this page regularly to review the most up to date Privacy Policy.

## **Further information**

Further information relating to your data privacy rights is available at [www.dataprotection.ie](http://www.dataprotection.ie)

## How to complain

If you are unhappy about how we have treated your personal data, you may make a complaint to the Data Protection Commission. Their contact details are as follows: -

Data Protection Commission

21 Fitzwilliam Square South

Dublin 2

D02 RD28

Tel +353 (0)0761 104800

+ 353 (0)57 868 4800

The Commission may also be contacted via their website at [www.dataprotection.ie](http://www.dataprotection.ie)