



AMPLEFORTH
ABBAY

Ampleforth Lourdes Pilgrimage Privacy Notice/Transparency Information

Person(s) Responsible for the Policy:	Data Protection Officer
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Ampleforth Lourdes Pilgrimage Privacy Notice/Transparency Information

At a glance:

This document sets out the basis on which we collect, use, and disclose personal data of people connected with Ampleforth Lourdes Pilgrimage.

It also outlines your rights in respect of your personal data.

Ampleforth Abbey Trust respects your privacy and is committed to protecting your personal data and being transparent about how we collect and use it. During your relationship with the Trust we will collect, use and hold (“process”) your personal data. This makes the Trust a data controller of your personal information.

This Transparency Information (sometimes known as a Privacy Notice) explains how we use the personal data that you provide, or which third parties provide to us. It applies to everyone connected with the Pilgrimage, and sets out how we will use that information and what your rights are.

Our Data Protection Officer (DPO) is responsible for answering any questions you have about this Privacy Notice. You may contact them at DPO@ampleforthabbey.org.uk

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK’s supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with any concerns you may have before you approach the ICO, so please feel free to contact us first.

We will review and may update this Privacy Notice from time to time, or provide additional information.

The personal data we collect from you, how we collect it and how we use it

This section explains what information we might collect, keep and store about you.

Why do we collect your personal data?

We use your personal data to:

- Deal with your enquiries, application for the Pilgrimage, requests and complaints;
- Administer the Pilgrimage;
- Provide for your wellbeing;
- Process your donations;

- Provide you with information about our activities, events and services;
- Conduct our campaigns, fundraise and send marketing.

We need to process your data to meet our contractual obligations under any agreement with you. For example, we need to process your data to perform contracts for travel and accommodation and cannot fulfil the contract without your data.

Often you give us your consent to process your data. For example, when you choose to subscribe to our newsletters, or make requests for prayer. We will always ask for your consent to take and display promotional photographs and video footage. We will never pass your personal data on to other organisations for them to use for their own marketing purposes. You provide us with your specific and informed consent to facilitate the provision of medical treatment for you during the Pilgrimage to Lourdes.

In some cases, we need to process data to ensure that we are complying with our legal obligations, or where this is needed in the public interest or for official purposes. For example, we are required to comply with safeguarding obligations, administer Gift Aid, and comply with health and safety laws. Please note that we may process your personal information without your knowledge or consent where this is required or permitted by law.

In other cases, we have a legitimate interest in processing personal data. For example, we carry out our activities including ministry, sacramental programmes and pastoral and spiritual care. We administer and keep our accounts up to date, process donations, and maintain memberships of groups which you have chosen to join. We use website analytics to understand how people use our website so that we can improve it.

In certain limited circumstances we will process your personal data to protect you in matters of life and death.

Some of these reasons for processing your data will overlap and there may be several grounds which justify our use of your personal information. We will only use your personal data for the purposes for which we collect it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

What personal data do we collect?

We may collect the following data about you:

- Your name, address, and contact details, including email address and telephone number, as well as contact preferences
- Date of birth
- Information about your marital status, next of kin, dependents, and emergency contacts

- Information about your involvement in Pilgrimage activities and events
- Your image
- Gender, marital status, sex, sexual orientation, national or geographic heritage, beliefs
- Information relating to background checks including criminal offences and convictions
- Information about your health and wellbeing.

We collect your information in a variety of ways. For example:

- From enquiries you make and your application to join the Pilgrimage
- If you request Pilgrimage newsletters, or prayers
- Through financial transactions like making a donation
- From correspondence with you
- Through discussions and meetings with you.

We may also collect information about you from third parties, such as people supplying references, other parts of the Church such as Dioceses, and information from criminal records checks as permitted by law. We will collect information about Assisted Pilgrims from their GP and other health professionals, with consent. Usually third parties provide appropriate evidence that you have agreed your personal data may be shared with other organisations, but sometimes this may be without your knowledge or consent, for example in relation to criminal convictions.

If you use your credit or debit card to donate to us, or pay online or over the phone, we will ensure this is done securely. We do not store your credit or debit card details: following completion of your transaction, all card details are securely destroyed.

We also gather general information about the use of our websites such as pages visited and areas that are of most interest to users.

How long do we keep your personal data?

Medical records will be held for up to 20 years after your last pilgrimage. We keep other personal data for as long as required to meet legal requirements and tax and accounting rules. Where your information is no longer needed, we will ensure it is destroyed in a secure manner. This will generally be within seven years of your last contact with us unless you have told us you intend to make a bequest in your will.

Your roles and dates of Pilgrimages will be retained permanently.

Sharing your data and transfers to other countries

We share your personal data with third parties who provide services on our behalf (“data processors”), business partners and suppliers, including:

- Travel agents and providers of accommodation and travel

- The Sanctuary of Our Lady of Lourdes
- Payment and donation websites
- Photographers, videographers, printers, and creative agencies
- Our IT suppliers
- Insurers, solicitors, brokers, loss adjusters or managing agents
- Fraud protection and credit risk reduction organisations.

Where we are under a duty to disclose or share your personal information to comply with any legal obligations, or where the disclosure is ‘necessary’ for purposes of national security, taxation, and criminal investigation, we will share your data with authorities, agencies, and statutory bodies. These include the Charity Commission and external auditors or inspectors. We will share your information with other bodies to enforce or apply agreements, or to protect the rights, property, or safety of the organisation, our donors, beneficiaries, or others. We will share health data with other health professionals with your consent.

The data that we collect from you may be transferred to, and stored in, a location outside of the United Kingdom (UK). Whilst we normally process your data within the UK or the European Economic Area, some of these other organisations run their operations outside the UK in countries that may not provide the same standard of data protection as the UK. Your data may also be processed by people operating in these locations who work for us or our service providers. In these instances, we will take the necessary steps to make sure appropriate protections are in place (in accordance with UK Data Protection Law) and that your information is safeguarded.

How do we keep your data safe?

We take the security of your personal data very seriously. We have internal policies, controls, and security measures in place to ensure that your data is not lost, accidentally destroyed, misused, or disclosed, and is not accessed except by our people in the proper performance of their duties.

Your legal rights

You have the following rights in relation to your personal data under Data Protection Law:

- The right to **be informed about the data we hold and share about you**. This Transparency Information/Privacy Notice and any specific information we provide to you gives you this information.
- The right to **access your personal data**. By making a subject access request you can find out what personal data we hold about you, why we hold it and who we disclose it to. You can make a subject access request to us in writing. We may require you to provide proof of your identity. If a health professional considers that access to your health data might harm your mental or physical health we may withhold it.
- The right to **edit and update your personal data**. Please keep us informed if your personal data changes during the duration of your relationship with us.

- In certain cases, the right to **request to have your personal data deleted**.
- In certain cases, the right to **restrict processing of your personal data**.
- The right to **data portability**, i.e., to receive a copy of the personal data you have provided to us in a way that is accessible and machine-readable, for example as a csv file, and to request the transfer of this data to another organisation where technically feasible.
- The right to **object to our processing**.

If you wish to exercise your rights, please email DPO@ampleforthabbey.org.uk providing as much information as possible about the nature of your contact with us to help us locate your records. Any changes you have requested may take 30 days before they take effect. Once we have received your request, and verified your identity, we will respond within one month, unless a longer period is permitted by applicable law, such as where the request in question is complex.