



Diocese of Arundel & Brighton Data Processing Audit Form

Type or category of Personal Data	Data Subject(s)	Volume of Personal Data (approx. no. of Data Subjects)	Legal basis for and purpose of processing (inc. additional basis if special category)	Transfers to third party recipients (inc. outside EEA)	Security measures	Retention period	Are you the: Data Controller/ Joint Data Controller/ Data Processor	Have you issued a suitable Privacy Statement?	Person responsible for the data
<i>CCTV footage</i>	<i>Visitors to premises, inc. staff, clergy & parishioners</i>	<i>Up to 50 visitors per week</i>	<i>Legitimate interests: safety & prevention and detection of crime</i>	<i>Insurers; police</i>	<i>Footage stored in secure server room, password known to two staff members</i>	<i>Disc overwrites after 1 month</i>	<i>Data Controller</i>	<i>Signs displayed outside premises identifying the Data Controller</i>	<i>Facilities Manager</i>



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Notes

For each type of data processing undertaken, there must be a lawful basis for processing under Article 6 of the GDPR. The main lawful bases that a Diocese can rely upon are:

- (i) the processing is necessary to enter into or perform a contract;
- (ii) the processing is necessary to comply with a legal obligation;
- (iii) the processing is necessary to pursue the legitimate interests of the Diocese and does not cause unwarranted prejudice to the privacy rights of the individual;
- (iv) you have the consent of the individual

Where the Diocese is processing **Special Categories of Personal Data** one of the conditions for processing under Article 9 GDPR must also be identified. Such processing often requires the explicit consent of the individual. This is because special category data is more sensitive, and so needs more protection. For example, information about an individual's: race; ethnic origin; politics; religion; trade union membership; genetics; biometrics (where used for ID purposes); health; sex life; or sexual orientation.

The main lawful bases that a Diocese can rely upon in relation to special categories of data are:

- (v) you have the explicit consent of the individual;
- (i) the processing is necessary to protect an individual's vital interests or someone else's vital interests;
- (ii) the processing is carried out in the course of the Diocese's legitimate interests as a Roman Catholic diocese working with and supporting current and former parishioners and the information is not shared outside the Diocese other than with an individual's consent;
- (iii) the processing is necessary for the establishment, exercise or defence of legal claims;
- (iv) the processing is necessary for carrying out the Diocese's employment and social security obligations; or
- (v) the processing being necessary for reasons of substantial public interest.

Consent should be relied upon sparingly because of the quality of consent required under the GDPR and the fact that data subjects must be free to withdraw their consent at any time, which can be problematic.