

**Archdiocese for the Military Services, USA**  
**Privacy Policy**



This page informs you of the Archdiocese for the Military Services, USA policies regarding the collection, use, and disclosure of Personal Data, and rights an individual may have with regard to Personal Data. This Privacy Policy is managed by the General Counsel for the Archdiocese.

The Archdiocese uses data to provide and improve its services. By using the Archdiocese's website and engaging in its services, you agree to the collection and use of information in accordance with this policy.

## **1 INTRODUCTION**

1.1 The Archdiocese for the Military Services, USA (the "Archdiocese" or "AMS") is a registered Catholic charity incorporated in the State of Maryland and a nonprofit corporation under section 501(c)(3) of the Internal Revenue Code. The Archdiocese has a primary place of business at the Edwin Cardinal O'Brien Pastoral Center, 1025 Michigan Ave., Northeast, Washington, DC 20017.

1.2 When an individual provides the Archdiocese with Personal Data to engage and/or benefit from activities, the AMS may keep a record of the data to comply with statutory obligations and to achieve legitimate business, charitable, or ecclesiastical objectives of advancing and maintaining the Roman Catholic Faith throughout the Archdiocese.

1.3 For the purpose of the European Union's General Data Protection Regulation 2016/279 (GDPR), the Archdiocese is a Data Controller with regard to Personal Data. In some cases, the Archdiocese may be a joint Data Controller of Personal Data (e.g., where data is shared between the Archdiocese and another organization for a particular purpose).

1.4 The Archdiocese is committed to ensuring that Personal Data is properly and securely managed in accordance with relevant data protection laws and regulations.

Please read this Notice to understand how the Archdiocese uses and protects the information provided, obtained, or held about individuals, and to understand an individual's rights with regard to Personal Data. This Notice applies to information about living identifiable individuals only.

## **2 PERSONAL DATA**

2.1 The Archdiocese may hold the following types of Personal Data:

- 2.1.1 name and contact details;
- 2.1.2 sex, age, date of birth, marital status, and nationality;
- 2.1.3 education/work history and professional qualifications;
- 2.1.4 information about a family unit;
- 2.1.5 information about involvement in Archdiocesan activities and events;
- 2.1.6 details of any donations made to the Archdiocese;
- 2.1.7 information about sacraments, catechetical certifications, proceedings with the tribunal, or ecclesiastical qualifications;
- 2.1.8 information obtained as a result of any background checks on employees, clerics, religious, or volunteers;
- 2.1.9 video recordings and photographs;
- 2.1.10 information collected through an individual's use of the AMS website(s) and portal such as IP addresses, date and time of log in, and other information collected using cookies; and
- 2.1.11 any other information that individuals provide to the AMS.

2.2 The Archdiocese may also hold Special Categories of Personal Data as defined by the General Data Protection Regulation. These may include: information about religious beliefs, information about health and wellbeing, information revealing racial or ethnic origins, information concerning sexual orientation, or, in the case of background checks, information about criminal records or proceedings.

2.3 The Archdiocese may also receive Personal Data about an individual from a third party, for example, family members, other members of a chapel community or parishioners, other dioceses, medical professionals, the United States military or Department of Veterans Affairs, or police and other law enforcement bodies.

## **3 PROCESSING OF PERSONAL DATA**

3.1 Personal Data, whether collected directly from an individual or indirectly from a third party may be Processed in a number of ways, for example:

- 3.1.1 to communicate with individuals in relation to news about or activities and events taking place in the Archdiocese, including seeking feedback and informing individuals of any changes to Archdiocesan activities;
- 3.1.2 to improve the way the Archdiocese communicates with individuals, to include the AMS website, podcasts, or social media;
- 3.1.3 to carry out activities in furtherance of the goals of the Archdiocese, for example, sacraments, functions of the tribunal, funerals, general pastoral and spiritual care;

- 3.1.4 to process donations or other payments and solicit donations through direct and electronic mail;
  - 3.1.5 to administer, support, improve, and develop the administration of the Archdiocese's work and operations and to keep the Archdiocese's accounts and records up-to-date;
  - 3.1.6 to process applications, including grant applications and applications for any role within the Archdiocese, such as catechist certifications, extraordinary ministers of Holy Communion, *celebrets*, letters of good standing, or ecclesiastical endorsements;
  - 3.1.7 to help the Archdiocese improve its fundraising and find potential sources of additional funds, by gathering information about supporters, either information that they have shared themselves or that is publicly available, which can be used to tailor requests; through building relationships with supporters. Supporters can ask the Archdiocese not to use their data in this way by emailing [advancement@milarch.org](mailto:advancement@milarch.org);
  - 3.1.8 for audit and statistical purposes;
  - 3.1.9 to ensure compliance with legal obligations;
  - 3.1.10 to prevent or detect crime, and to help create a safer environment for our staff, subjects, and visitors; and
  - 3.1.11 to live stream or re-play recorded Masses and other church celebrations.
- 3.2 Any information gathered through cookies and similar technologies via the Archdiocesan website is used to measure and analyze information on visits to the website, to tailor the website to make it better for visitors, and to improve technical performance. The Archdiocese will not use the data to identify you personally or to make any decisions about you.

#### **4 PROCESS PERSONAL DATA**

- 4.1 The Archdiocese must have a lawful basis for processing an individual's information; this will vary according to the circumstances of how and why the Archdiocese has Personal Data, but typical examples include:
- 4.1.1 the activities are within a legitimate interest in advancing and maintaining the Roman Catholic Faith, maintaining sacramental records, providing information about the activities of the Archdiocese or any Catholic community under the canonical jurisdiction of the AMS, and to raise charitable funds;
  - 4.1.2 by engaging with the Archdiocese, an individual gives consent to the AMS's use of Personal Data (consent may be withdrawn at any time by contacting the Archdiocese using the details below);
  - 4.1.3 the Archdiocese is carrying out necessary steps in relation to a contract to which the individual is a party;
  - 4.1.4 the Processing is necessary for compliance with a legal obligation (e.g., responding to a request from law enforcement authorities);
  - 4.1.5 the Processing is necessary for carrying out a task in the public interest (e.g., updating and maintaining the register of marriages); or

4.1.6 to protect an individual's vital interests (e.g., reporting information for a workers' compensation or unemployment claim).

4.2 If the Archdiocese Processes any Special Categories of Personal Data it must have a further lawful basis for the processing. This may include:

4.2.1 where an individual has given explicit consent to do so;

4.2.2 where the Processing is necessary to protect a vital interest or someone else's vital interest (e.g., passing on information to law enforcement);

4.2.3 where the Processing is carried out in the course of a legitimate interest as a Roman Catholic archdiocese;

4.2.4 the information is public;

4.2.5 where the Processing is necessary for the establishment, exercise, or defense of legal claims;

4.2.6 where the Processing is necessary for carrying out the Archdiocese's employment and social security obligations; or

4.2.7 the processing being necessary for reasons of substantial public interest (e.g., where steps are taken to prevent fraud or other dishonest activity); provided that the legal basis is proportionate to the aim pursued and provides for suitable and specific measures to safeguard an individual's rights, or as part of the Archdiocese's legitimate interests.

4.3 If the Archdiocese processes any Personal Data comprising criminal convictions or offenses, it must also have a further lawful basis for the processing. This may include:

4.3.1 where the Archdiocese is exercising obligations or rights that are imposed by law or policy (e.g., to undertake appropriate checks on individuals prior to taking up a role);

4.3.2 where it is necessary for the prevention or detection of an unlawful act (e.g., passing on information to the Police or other investigatory body);

4.3.3 where the Archdiocese is complying with or assisting others to comply with regulatory requirements relating to unlawful acts or dishonesty (e.g., passing on information to the Police or other investigatory body);

4.3.4 where it is carried out in the course of safeguarding children or other individuals at risk e.g., making a safeguarding disclosure;

4.3.5 where an individual has given consent to the processing;

4.3.6 where the Archdiocese is establishing, exercising, or defending legal claims (e.g., providing information to its insurers or lawyers in connection with legal proceedings);

4.3.7 where it is carried out in the course of the Archdiocese's legitimate activities as a not-for-profit body with religious aims (e.g., carrying out pastoral activities).

## **5 SHARING OF PERSONAL DATA**

5.1 The Archdiocese uses Personal Data for the purposes for which it was obtained, unless an individual has agreed to the sharing of Personal Data with another organization.

5.2 The Archdiocese may share Personal Data with other members of the Church seeking relief and any ecclesiastical body enjoying canonical jurisdiction or powers of governance as detailed in the Code of Canon Law and norms governing the universal and particular Catholic Church.

5.3 The Archdiocese may share Personal Data with government bodies for tax purposes or law enforcement agencies for the prevention and detection of crime.

5.4 Sometimes the Archdiocese contracts with third parties to Process Personal Data on its behalf (e.g., IT consultants). The Archdiocese requires these third parties to comply strictly with AMS instructions and with relevant data protection regulations.

5.5 The Archdiocese has in place administrative, technical, and physical measures designed to guard against and minimize the risk of loss, misuse, or unauthorized processing or disclosure of the Personal Data.

## **6 DURATION OF INFORMATION STORAGE**

6.1 The Archdiocese stores Personal Data as long as necessary for legitimate business or ecclesiastical functions and consistent with any document retention policies.

6.2 Consistent with the universal and particular law of the Catholic Church, an individual may not have a right to deletion of some types of Personal Data, such as sacramental records.

## **7 INDIVIDUAL RIGHTS**

7.1 An individual may have certain rights with regard to Personal Data provided to the Archdiocese. Such rights of an individual may include:

7.1.1 the right to request a copy of some or all of that individual's Personal Data;

7.1.2 the right to withdraw consent to the way the Archdiocese processes Personal Data;

7.1.3 the right to ask for correction to inaccuracies in Personal Data;

7.1.4 the right to request that the Archdiocese restrict the Processing of all or part of an individual's Personal Data;

7.1.5 the right to ask for deletion of Personal Data where there is no legitimate business or ecclesiastical purpose to continue to process it;

7.1.6 the right to object to Processing Personal Data for direct marketing purposes; and

7.1.7 the right not to be subject to legal or other significant decisions on the basis of an automated process (i.e., without human intervention).

7.2 The above rights may be limited in some situations – for example, including where the Archdiocese has a legal requirement to process Personal Data. The Archdiocese reserves the right to require proof of identity for verification and data security purposes before an individual can exercise any of the rights listed in this section.

7.3 Rights may only be exercised by the individual whose information is being held by the Archdiocese or with that individual's express permission, or by an individual's parent or guardian if such request is deemed reasonable by the Archdiocese.

## **8 CHANGES TO THIS NOTICE**

8.1 The Archdiocese may make changes to this Notice from time to time as organizational practices and/or applicable laws change. The Archdiocese will not make any use of Personal Data that is inconsistent with the original purpose(s) for which it was collected or obtained.

## **9 CONTACT DETAILS**

9.1 For questions or further information about how the Archdiocese protects Personal Data, or if you wish to exercise any of the above rights, please contact the AMS General Counsel, [gencounsel@milarch.org](mailto:gencounsel@milarch.org), or (202) 719-3635, 1025 Michigan Ave. Northeast, Washington, DC 20017.

9.2 The Archdiocese will respond to requests about the processing of Personal Data within thirty (30) business days.

## **10 COOKIES**

10.1 Cookies, also known as browsers or tracking cookies, are small text files that are added to your computer when an individual visits a website.

10.2 The Archdiocese uses cookies such as Google Analytics and Pardot for tracking purposes. The cookies allow the Archdiocese to understand general traffic to the website, such as the number of visitors and length of time on the website in an anonymous form, as well as information about known users.

10.3 Web developer, consultant. The Archdiocese uses the services of an IT company for technical support for its website. That company will have access to information gathered through the website. The IT provider is compliant with governing data protection regulations.

10.4 Website users may opt in or out of some types of cookies using their own web browsers. However, users cannot opt-out of the deployment of cookies that are necessary for delivery of AMS website or services to visitors.

## **11 DEFINITIONS**

"Data Processor" means any person, organization, or body that Processes personal data on behalf of and on the instruction of the Archdiocese. Data Processors have a duty to protect the information they process by following data protection laws.

"Data Subject" means a living individual about whom the Archdiocese processes Personal Data and who can be identified from the Personal Data. Data Subjects may have different legal rights in relation to their Personal Data depending on their national origin, citizenship, or residency.

"Personal Data" means any information relating to a living individual who can be identified from that information or in conjunction with other information that is in, or is likely to come into, the

Archdiocese's possession. Personal Data can be factual (such as a name, address, or date of birth) or it can be an opinion (e.g., a performance appraisal). A mere mention of someone's name in a document does not necessarily constitute Personal Data, but personal details such as someone's contact details or donor history would fall within the definition.

"Processing" means any activity that involves use of Personal Data. It includes obtaining, recording, or holding the information, or carrying out any operation or set of operations on it, including organizing, amending, retrieving, using, disclosing, erasing, or destroying Personal Data. Processing also includes transferring or disclosing Personal Data to third parties.

"Special Categories of Personal Data" means information about a person's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health, or condition or sexuality. Under the General Data Protection Regulation, it also includes genetic and biometric data. Special Categories of Personal Data can only be processed under strict conditions and such processing will usually, although not always, require the explicit consent of the Data Subject.