



Privacy Program

St. Vincent de Paul Society

1. Introduction and Purpose

This Privacy Program outlines the commitment of the St. Vincent de Paul Society (the "Charity") to protect the privacy and personal information of its donors, beneficiaries, volunteers, employees, and other stakeholders in accordance with the Bermuda Personal Information Protection Act 2016 (PIPA). This program establishes the framework for responsible and lawful collection, use, storage, disclosure, and disposal of personal information.

2. Definitions

For the purposes of this Privacy Program, the following definitions shall apply:

- **Personal Information:** Means any information about an identifiable individual.
- **Processing:** Means any operation or set of operations which is performed on personal information or on sets of personal information, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- **Data Controller:** Means a person who, alone or jointly with others, determines the purposes and means of the processing of personal information. The Charity's Committee is the Data Controller for the personal information it collects and processes.
- **Data Subject:** Means an identifiable individual who is the subject of personal information.
- **Privacy Commissioner:** Means the independent supervisory authority established under PIPA.
- **Consent:** Means any freely given, specific, informed, and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal information relating to him or her.

3. Principles of PIPA Compliance

The Charity is committed to adhering to the eight data protection principles outlined in PIPA:

- **Principle 1: Accountability:** The Charity will implement appropriate technical and organizational measures to ensure and demonstrate that processing is performed in accordance with PIPA.

- **Principle 2: Transparency:** The Charity will provide data subjects with clear and easily accessible information about its personal information handling practices.
- **Principle 3: Purpose Limitation:** Personal information will be collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- **Principle 4: Data Minimization:** Personal information collected will be adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.
- **Principle 5: Accuracy:** Personal information will be accurate and, where necessary, kept up to date; every reasonable step will be taken to ensure that personal information that is inaccurate, having regard to the purposes for which it is processed, is erased or rectified without delay.
- **Principle 6: Storage Limitation:** Personal information will be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which personal information is processed.
- **Principle 7: Integrity and Confidentiality:** Personal information will be processed in a manner that ensures appropriate security of the personal information, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organizational measures.
- **Principle 8: Rights of Data Subjects:** The Charity will respect the rights of data subjects under PIPA, including the right to access, rectify, erase, restrict processing, and object to processing of their personal information.

4. Roles and Responsibilities

- **The Charity's Board appoints Anthony Donaghy as the Privacy Officer:** This individual will be responsible for overseeing the implementation and enforcement of this Privacy Program, ensuring compliance with PIPA, and acting as the point of contact for privacy-related inquiries.
- **Responsibilities of the Charity's Board:** Each Board member is responsible for handling personal information in accordance with this program and PIPA.

5. Collection of Personal Information

- **Lawful Basis for Processing:** The Charity will only collect and process personal information where a lawful basis for processing exists under PIPA, such as:
 - Consent of the data subject.
 - Necessity for the performance of a contract with the data subject.

- Necessity for compliance with a legal obligation.
 - Necessity to protect the vital interests of the data subject or another natural person.
 - Necessity for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
 - Necessity for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject.
- **Methods of Collection:** The Charity will collect personal information through various means, including applications for financial assistance, volunteer applications, Loaves and Fishes forms, phone calls and email communications.
 - **Information Provided to Data Subjects at Collection:** At the point of collection, the Charity will provide data subjects with clear and concise information as required by PIPA, including:
 - The identity and contact details of the Charity.
 - The purposes of the processing for which personal information is intended.
 - The lawful basis for the processing.
 - The categories of personal information being collected.
 - The recipients or categories of recipients of the personal information (if any).
 - Where applicable, the fact that the Charity intends to transfer personal information to a third country or international organization and the existence or absence of an adequacy decision by the Privacy Commissioner, or appropriate safeguards.
 - The period for which the personal information will be stored, or if that is not possible, the criteria used to determine that period.
 - The existence of the right to request from the controller access to and rectification or erasure of personal information or restriction of processing concerning the data subject or to object to processing as well as the right to data portability.
 - Where the processing is based on consent, the existence of the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.
 - The right to lodge a complaint with the Privacy Commissioner.
 - Whether the provision of personal information is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether

the data subject is obliged to provide the personal information and of the possible consequences of failure to provide such information.

- The existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of PIPA and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

6. Use and Disclosure of Personal Information

- **Purpose Limitation:** Personal information will only be used for the specific purposes for which it was collected, or for compatible purposes as permitted by PIPA.
- **Disclosure:** Personal information will only be disclosed to third parties where there is a lawful basis for doing so, such as:
 - With the consent of the data subject.
 - To service providers who have entered into a data processing agreement with the Charity.
 - When required by law or legal process.
 - To protect the vital interests of the data subject or another natural person.
- **Data Sharing Agreements:** Where the Charity shares personal information with third-party processors, appropriate data sharing agreements will be put in place to ensure the protection of personal information.

7. Data Security

- **Technical and Organizational Measures:** The Charity will implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk, including:
 - Standard Microsoft OneDrive controls (password and/or link sharing and monitoring, firewall, intrusion detection and regular security assessments)
 - Protection on any external hard drive or USB drive devices and ensuring only Board members have access to those devices.
- **Data Breach Procedures:** The Charity will establish and maintain procedures for responding to data breaches in accordance with PIPA, including notification to the Privacy Commissioner and affected data subjects where required.

8. Data Retention

- **Retention Periods:** Personal information will be retained only for as long as necessary to fulfill the purposes for which it was collected and processed, or as required by applicable law. Specific retention schedules will be developed for different categories of personal information.
- **Secure Disposal:** When personal information is no longer required, it will be securely disposed of in a manner that prevents unauthorized access or use.

9. Rights of Data Subjects

The Charity will ensure that data subjects can exercise their rights under PIPA, including:

- **Right to Access:** Data subjects have the right to obtain confirmation as to whether or not personal information concerning them is being processed, and, where that is the case, access to personal information and certain related information.
- **Right to Rectification:** Data subjects have the right to obtain without undue delay the rectification of inaccurate personal information concerning them.
- **Right to Erasure ("Right to be Forgotten"):** Data subjects have the right to obtain the erasure of personal information concerning them without undue delay in certain circumstances.
- **Right to Restriction of Processing:** Data subjects have the right to obtain restriction of processing in certain circumstances.
- **Right to Object:** Data subjects have the right to object, on grounds relating to their particular situation, at any time to processing personal information concerning them.
- **Right to Data Portability:** Data subjects have the right to receive the personal information concerning them, which they have provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which personal information has been provided.
- **Right Not to be Subject to Automated Individual Decision-Making, Including Profiling:** Data subjects have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affects them, under certain conditions.

The Charity will establish clear procedures for handling data subject requests and will respond to such requests in a timely manner in accordance with PIPA.

10. Training and Awareness

The Charity will provide regular training and awareness programs to its Board members and volunteers on their responsibilities under this Privacy Program and PIPA, as deemed appropriate by the Board.

11. Monitoring and Review

This Privacy Program will be reviewed and updated periodically to ensure its ongoing effectiveness and compliance with PIPA and any relevant changes in legislation or best practices.

12. Contact Information

For any questions or concerns regarding this Privacy Program or the Charity's personal information handling practices, please contact:

Anthony Donaghy - Committee member and Privacy Officer

Email: anthony_donaghy@yahoo.com

13. Complaints

Data subjects have the right to lodge a complaint with the Privacy Commissioner if they believe that the Charity has infringed their rights under PIPA. The contact details for the Privacy Commissioner are available online at <https://www.privacy.bm/>

Conclusion

the St. Vincent de Paul Society is committed to protecting the privacy and personal information of all individuals we interact with. This Privacy Program demonstrates our commitment to complying with the Bermuda Personal Information Protection Act 2016 and fostering a culture of data privacy within our organization.

March 2026