

# St Francis de Sales Catholic Church - Privacy Policy regarding live online streaming of Sunday Mass

## Our contact details

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## Data Protection issues regarding live online streaming of Sunday Mass

It is acknowledged that the live online streaming of church services to members of the church community who cannot, for various reasons, attend services in person, is of huge benefit both to them and the wider church community. Such live online streaming does, however, raise issues relating to the data protection rights of individuals who might be identifiable from being observed through the online stream.

St Francis de Sales Catholic Church (the **Church**) conducts live online streaming of only one mass each week; the mass which takes place at 11 am on Sunday morning (the **Mass**).

This policy (the **Policy**) sets out the Church's approach to the processing of data in relation to the live online streaming of the Mass. The Policy is published on the Church's website and copies of the Policy are available on request from the Church.

## The type of personal information processed

During the Mass, it is possible that members of the congregation may be visible occasionally on the live online stream. Every effort is made to minimise this occurring (see the section below on *Minimising the data processed*) but, due to this potential, the Church has produced this Policy to inform all attendees at the Church of which data might be processed during live online streaming; how this data will be processed; and what rights any attendees have in relation to this data.

## **What processing takes place**

During the Mass, the Church uses cameras for the live streaming which are focused on the altar; the lectern; and the Priest's chair. This means that, for the vast majority of the Mass, only the clergy, altar servers, readers and Eucharistic Ministers will be visible on the live stream.

Under the UK General Data Protection Regulation (**UK GDPR**), the lawful bases the Church relies upon for processing this information are: (i) the individual's consent to the processing under Article 6 due to their continuing attendance at Mass having been notified of the processing taking place; and (ii) reliance on the legitimate activities of the Church (as a religious organisation) under Article 9.

The Church does not consider that obtaining express written consent to such processing of data from any and all attendees at the Mass is practical. The numbers attending at Mass can be large and there will often be certain visitors who will be attending only occasionally or perhaps just once.

Instead, notices have been placed immediately outside the Church; in the Church; and in the Church's weekly bulletin to notify attendees that live streaming will take place at the Mass. The Church therefore feels that the continuing attendance of the attendees at the Mass, following such notifications, demonstrates their consent to the processing. Parents and carers of children should be aware that their child may, in the same way as adult parishioners, be visible occasionally on the live online stream. Should parents and carers wish to avoid this, they should have regard to the measures taken by the Church as outlined below.

The online stream is available during the Mass itself and a recording of the Mass is available on YouTube for a period of no more than 28 days following the specific Mass. This is in accordance with guidance issued by the Diocese of Portsmouth regarding online streaming and future availability of recordings of any Mass.

## **Minimising the data processed**

The cameras used for the online streaming are focused on the altar; the lectern; and the Priest's chair. All seats in the transept of the Church are completely out of the camera's view so, should any attendee wish to do so, they can easily sit in a part of the Church which will not be visible on the camera stream.

When children, parents or helpers attending the Church's children's liturgy group leave from or return to the Church, they congregate away from the altar, in the main body of the Church.

All attendees are also notified, in the Church's weekly bulletin, and by way of signs in the Church and immediately outside the Church, of the processing of data. Should any attendee wish to avoid any possibility of being visible on the live stream, they also have the option of attending Saturday evening mass, which is not streamed.

### **Your right to withdraw consent to processing**

As stated above, the Church does not consider it practical to obtain express written consent, from any and all attendees at the Mass, to the processing involved in the live online streaming. The Church views the continuing attendance of attendees at the Mass, following the notifications given in the Church itself; the Church's weekly bulletin; and this Policy as indicating consent to the processing notified.

If at any time, any attendee wishes to withdraw their consent to this processing they can: (i) notify the Church in writing, to the contact email address stated in this Policy, and the Church will advise as to the next steps to be taken; (ii) attend any mass at the Church other than the Mass (as all other masses are not live streamed); or (iii) attend the Mass as usual, but sit in the transept to avoid any possibility of being seen on the live online stream.

### **Your data protection rights**

Under data protection law, you have rights including:

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at: [washcommon@portsmouthdiocese.org](mailto:washcommon@portsmouthdiocese.org); St Francis de Sales Catholic Church, Warren Road, Newbury, Berkshire, RG14 6NH; or 01635 40332 if you wish to make a request.

## **How to complain**

If you have any concerns about the Church's processing of your personal information, you can write to us at:

[washcommon@portsmouthdiocese.org](mailto:washcommon@portsmouthdiocese.org); St Francis de Sales Catholic Church, Warren Road, Newbury, Berkshire, RG14 6NH; or 01635 40332.

You can also complain to the Information Commissioner's Office if you are unhappy with how the Church has used your data.

The ICO's address:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>