

General Data Protection Regulation

As an Institute we are required by law to develop a policy in compliance with the General Data Protection Regulation (GDPR) of the European Union. Under the terms of GDPR, organizations have to ensure that personal data is gathered legally and under strict conditions. Those who collect and manage it are obliged to protect it from misuse and exploitation, as well as to respect the rights of data owners, or face penalties for not doing so.

Religious Congregations with Generalates in Europe are required to have a policy for the protection of data of the sisters. In Italy, the Bishops Conference made the law an ecclesiastical regulation and it is the bishops who supervise compliance. Sanctions for religious entities are canonical, i.e. removal from office. The policy does not have to be submitted to anyone but is signed by the Institute Leadership Council and kept in the Generalate for inspection if a supervisor from the bishops comes and asks to see it. Our policy was approved by our Italian lawyer.

The policy requires that we have a registry of data kept at the Generalate. This is information that we have always kept at our Generalate. It includes basic records (sisters' dates of birth, entrance, profession, death), copies of directories, necrology, jubilee lists, paperwork involved in the Sisters' participation in consultation processes, permissions related to the stages of formation, and financial information about the purchase or alienation of property, etc. The data covered by our registry is not accessible except to the sisters serving in the Generalate.

Having and using personal data requires consent, which constitutes the legal basis for the GDPR. You are probably familiar with "accepting cookies" on a website. This means that companies need to get your explicit consent to collect your data related to your visit on their website, for example, searches you do, products you look at, etc.

In the case of religious congregations, it seems clear that we have given implicit consent for this collection and use of data simply by belonging to the Institute since first profession. However, the GDPR applies to all organizations; thus more explicit consent is required, which the Area Leaders will organize. New members will sign the form at first profession.

Thank you for your collaboration as we implement this policy.