PRIVACY POLICY

Last Updated:19th November 2026

St. Austin's Parish Msongari respects your privacy and is committed to protecting personal information provided by pilgrims, parishioners, visitors, event participants and users of our website.

This Privacy Policy explains how we collect, use, store, disclose and protect personal information when you register for a pilgrimage or parish event, purchase tickets, make payments, visit our website, attend parish activities, or appear in photographs, video recordings or livestreams produced by the Parish.

Please read this Policy together with any event-specific notices or consent forms. Where we rely on consent, we will seek it in a clear and appropriate manner. Where another lawful basis is relied upon, the Parish will identify and document that basis as required by applicable law.

1. WHO WE ARE

ST. AUSTIN'S PARISH MSONGARI

Off James Gichuru Road

P.O. Box 252-00606 Sarit Centre, Nairobi, Kenya

Phone: 0726896364/0705593500

Email: staustinsparishnairobi@gmail.com

The Parish is responsible for the administration and coordination of its pastoral, religious, social, educational and community activities, including the management of personal information collected through its website, registration platforms, events and official communication channels. The Parish is committed to ensuring that all personal information is collected, processed, stored and used responsibly and in accordance with applicable data protection laws.

2. INFORMATION WE COLLECT

Depending on how you interact with the Parish, we may collect the following categories of personal information:

- Full name, phone number and email address;
- Parish or church affiliation and relevant registration details;

- Ticket type, pilgrimage or event registration information;
- Emergency contact name and phone number;
- Information reasonably required for transport, accommodation, meals or other event arrangements;
- Payment and transaction information, including payment references and confirmation details;
- Messages, enquiries, feedback and other information you voluntarily provide;
- Photographs, video images and audio recordings in which you may be identifiable, where these are captured during parish activities or events; and
- Website usage information, including cookies and similar technical information.

We aim to collect only information that is relevant and reasonably necessary for the purposes explained in this Policy.

3. HOW WE USE YOUR INFORMATION

We may use personal information for the following purposes:

- Processing pilgrimage and event registrations and ticket purchases;
- Verifying payments and maintaining appropriate financial and administrative records;
- Communicating important pilgrimage, event and parish information;
- Organizing transport, travel, accommodation, meals and attendance;
- Contacting emergency contacts where reasonably necessary;
- Responding to questions, requests, complaints and privacy enquiries;
- Operating, maintaining and improving our website and registration systems;
- Documenting parish activities and communicating the Parish's religious, charitable, educational and community work through approved communication channels; and
- Meeting applicable legal, regulatory, safeguarding and record-keeping obligations.

We will not use personal information for purposes that are incompatible with the reason it was collected unless we have an appropriate lawful basis and provide any information or obtain any consent required by law.

4. PAYMENT INFORMATION

Payments made through this website may be processed using approved payment methods, including M-Pesa, where available. Payment processing may involve trusted third-party payment service providers.

The Parish does not intentionally collect or store sensitive payment credentials such as your M-Pesa PIN. Transaction information may be retained for payment confirmation, accounting, reconciliation, dispute handling and record-keeping purposes.

5. HOW WE SHARE YOUR INFORMATION

Personal information may be shared, where necessary and appropriate, with authorized individuals or service providers involved in parish administration, pilgrimage or event organization. These may include:

- Authorized members of the Parish and the relevant organizing committees;
- Transport and accommodation providers;
- Event, pilgrimage and other service providers;
- Payment service providers;
- Website hosting, registration, ticketing and technology providers; and
- Public authorities or other recipients where disclosure is required or permitted by law.

We will seek to limit disclosures to information reasonably necessary for the relevant purpose and take appropriate steps to protect information shared with service providers. We do not sell personal information to third parties.

6. PROTECTING YOUR PERSONAL INFORMATION

The Parish takes reasonable administrative, organizational and technical measures to protect personal information against unauthorized access, loss, misuse, alteration or disclosure. Access is limited to persons who need the information for an authorized parish purpose.

No method of electronic transmission or storage can be guaranteed to be completely secure. If a personal data breach occurs, the Parish will assess and respond to it in accordance with applicable legal requirements.

7. HOW LONG WE KEEP YOUR INFORMATION

We retain personal information only for as long as reasonably necessary for the purpose for which it was collected, including pilgrimage and event administration, payment reconciliation, accounting, legal and regulatory compliance, dispute resolution and the protection of the Parish's legitimate interests.

When information is no longer required, it will be securely deleted, anonymized or otherwise disposed of appropriately, subject to any applicable retention obligations.

8. COOKIES AND WEBSITE TECHNOLOGIES

Our website may use cookies and similar technologies to ensure that the website functions properly and to improve your experience. WordPress, WooCommerce and other plugins may use cookies to support functions such as maintaining a shopping cart, processing checkout, remembering preferences, security and website functionality.

You can manage or disable cookies through your browser settings. Disabling certain cookies may affect website functionality. Where required, the website will provide an appropriate mechanism for managing non-essential cookies.

9. YOUR RIGHTS REGARDING YOUR PERSONAL INFORMATION

Subject to applicable law and any lawful limitations, you may have the right to:

- Be informed about the use of your personal information;
- Request access to personal information held about you;
- Request correction of inaccurate, incomplete or misleading information;
- Request deletion of personal information where the law permits;
- Object to or request restriction of certain processing;
- Withdraw consent where processing is based on consent; and
- Lodge a complaint with the Office of the Data Protection Commissioner (ODPC).

Some information may need to be retained where required by law or necessary for legitimate administrative, financial or dispute-resolution purposes. To exercise your rights, please contact the Parish using the details in Section 16.

10. THIRD-PARTY SERVICES

Our website may use third-party services and plugins, including WordPress, WooCommerce, M-Pesa payment services, event registration and ticketing plugins, website hosting providers and email service providers. These providers may process personal information as necessary to provide their services and may have their own privacy terms.

We encourage users to review the privacy information provided by relevant third-party service providers where applicable.

11. CHILDREN'S INFORMATION

Where a child participates in a pilgrimage, parish event or other activity, registration and the provision of personal information should be completed by or with the authorization of the child's parent or legal guardian, as required by law.

The Parish will collect only information reasonably necessary for the child's participation, safety and administration. Additional safeguards apply to photographs, video recordings and livestreaming involving children, as explained in Section 14. Parents or legal guardians may contact the Parish with questions or requests concerning a child's personal information.

12. PHOTOGRAPHY, VIDEO RECORDING AND LIVESTREAMING POLICY

The Parish may photograph, video-record or livestream certain Masses, liturgical celebrations, pilgrimages, meetings, concerts, youth and children's activities, charitable initiatives and other parish events. These activities support worship, religious communication, evangelisation, community engagement, documentation and the sharing of parish life with people who cannot attend in person.

12.1 What may be recorded and where it may appear

Recordings may include images, video and audio of the sanctuary, clergy, choir, readers, speakers, performers, event participants and, in some circumstances, members of the congregation. Depending on the event and the purpose, approved material may be shared on the Parish's official website, YouTube channel, Facebook page, other official social media accounts, parish displays, publications or other communication channels identified in an event notice.

12.2 Lawful basis, information and consent

The Parish will identify and document an appropriate lawful basis for recording and using personal data, in accordance with the Data Protection Act, 2019. Where the Parish relies on consent, it will seek consent that is informed, specific, freely given and capable of being withdrawn. Consent to appear in a livestream or recording will not be treated as automatic consent to unrelated uses, such as a separate promotional campaign, commercial use or publication in a different context.

A notice stating that recording is taking place is intended to inform people; it does not, by itself, amount to consent where consent is the required lawful basis. The Parish may use event-specific consent forms, registration choices or other suitable methods to obtain and record consent.

12.3 Congregational filming and camera-free areas

Where a service or event is livestreamed, the Parish will, where reasonably practicable, position cameras to focus on the sanctuary, clergy, choir, readers, speakers or other relevant participants and avoid unnecessary close-ups of congregants.

The Parish will provide a clearly identified camera-free seating area or another practical opt-out arrangement where reasonably practicable. Notices will be displayed at appropriate entrances and event locations to explain that photography, recording or livestreaming may take place and to direct attendees on how to avoid being filmed or raise a concern.

Attendees who do not wish to be identifiable in a recording should inform an usher or the Communications Office before the service or event and use the designated camera-free area. The Parish will take reasonable steps to respect that request. Because a live event may involve wide shots or incidental background capture, the Parish cannot guarantee that an attendee will never appear in any recording; concerns should be raised promptly so that reasonable steps can be considered.

12.4 Clergy, choir, readers, speakers and other featured participants

People who are scheduled to lead, speak, perform, read, serve or otherwise appear as featured participants should be informed in advance if the activity will

be recorded or livestreamed. Where consent is the appropriate lawful basis, the Parish will obtain consent before featuring them. Event organizers should communicate recording arrangements during invitations, rehearsals or registration.

12.5 Children and persons requiring additional care

The Parish will apply additional safeguards when recording children. Before a child is identifiable in a livestream, photograph or video intended for publication, the Parish will obtain consent from the child's parent or legal guardian where required by law and the circumstances. The Parish will avoid unnecessary disclosure of a child's full name, school, contact details or other identifying information.

Where appropriate consent has not been obtained, the Parish will take reasonable steps to keep the child out of identifiable shots or not publish the relevant material. Children's participation in a parish activity should not be made conditional on agreeing to publicity unless the recording is genuinely necessary to the activity and an appropriate alternative is not reasonably available.

12.6 Weddings, baptisms, funerals and other private or sensitive occasions

For weddings, baptisms, funerals, pastoral meetings and other occasions where attendees may reasonably expect greater privacy, the Parish will provide event-specific information and consider whether recording is appropriate. The Parish will consult the principal participants or their authorized representatives and obtain consent where required before featuring identifiable individuals.

12.7 Use, storage and access to recordings

Recordings will be accessed only by authorized persons and used for the purposes communicated to participants or otherwise supported by a lawful basis. The Parish will take reasonable steps to store recordings securely, limit access, and retain or delete raw footage and published copies in accordance with an appropriate retention schedule and applicable legal requirements.

12.8 Platforms and third-party processing

When a livestream or recording is published on platforms such as YouTube or Facebook, those platforms may independently process information under their

own terms and privacy policies. Content shared publicly may be viewed, copied, shared or retained by other users. The Parish cannot control independent processing carried out by those platforms or third parties.

12.9 Raising a concern or withdrawing consent

Anyone who wishes to opt out, raise a concern, request information about a recording or withdraw consent where processing is based on consent may contact the Parish Office or Communications Office using the contact details in Section 16. Withdrawal will not affect processing that took place lawfully before the withdrawal. The Parish will consider requests in accordance with applicable law, the nature of the recording, the rights of others and any legal retention requirements.

12.10 Responsibilities of the Communications Office

The Communications Office and authorized camera operators are expected to follow this Policy, use approved camera positions, respect camera-free areas and recorded opt-outs, obtain or verify required consent for featured participants, apply additional safeguards for children, restrict access to footage and refer privacy requests or incidents to the designated Parish contact.

13. CHANGES TO THIS PRIVACY POLICY

The Parish may update this Privacy Policy to reflect changes in its activities, website services, livestreaming arrangements or applicable legal requirements. The revised Policy will be published on the website with an updated effective date. Visitors and participants are encouraged to review it periodically.

14. CONTACT US AND PRIVACY REQUESTS

For questions, concerns, consent requests or requests relating to personal information, please contact:

ST. AUSTIN'S PARISH MSONGARI

Phone: 0726896364

Email: staustinsparishnairobi@gmail.com

Please provide sufficient information for the Parish to understand and respond to your request. The Parish may need to verify your identity or authority before acting on a request, particularly where it concerns a child.

15. CONSENT AND ACKNOWLEDGEMENT

When you submit personal information through the website, register for a pilgrimage or event, or otherwise provide information to the Parish, the Parish will explain the purposes and lawful basis for the relevant processing. Where consent is required, you will be asked to provide it separately and through an appropriate method.

Reading or acknowledging this Privacy Policy does not, by itself, constitute consent to every form of processing described in it, nor does attending a Mass or parish event automatically constitute consent to be featured in a recording where consent is the required lawful basis.

We are committed to handling personal information responsibly, respecting individual privacy and using information only for legitimate purposes supported by applicable law.

ST. AUSTIN'S PARISH CHURCH
19 NOV 2026
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(020) 521 9820
P.O Box 252 - 00606, NAIROBI

Communications Office

St. Austin's Parish Msongari