

FAIR PROCESSING NOTICE

(incorporating Data Privacy Statement, Privacy Policy, Data Protection Notice)

Caritas Social Action Network

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1. INTRODUCTION

Caritas Social Action Network ("CSAN", "we", "us" and "our") is a registered charity (number 1101431) in England and Wales and a company limited by guarantee (number 4505111) in England. Registered address is 39 Eccleston Square, London SW1V 1BX.

The purpose of this fair processing notice ("Notice") is to inform you of how Caritas Social Action Network ("CSAN", "we", "us" and "our") will process your personal data as a data controller and the measures and processes we have put in place to ensure its adequate protection. Providing such information is one of the requirements of the General Data Protection Regulation 2016/679 ("GDPR"). We are committed to protecting your privacy and processing your personal data fairly and lawfully in compliance with GDPR.

In being an organisational Member, receiving our products and services, working with us or using our websites, you consent to the collection, use, disclosure and transfer of your personal data as set out in this Notice.

This notice does not form any contractual relationship between you and us, and we may amend it from time to time.

2. FAIR AND LAWFUL PROCESSING

We will only process your personal data:

- (a) where you have given your consent;
- (b) where the processing is necessary to fulfil our obligations to Member organisations;
- (c) where the processing is necessary to provide our products or services to you/your organisation;
- (d) where the processing is necessary to respond to a request from you/your organisation;
- (e) where the processing is necessary to maintain our relationship with you/your organisation; and
- (f) where the processing is necessary for compliance with our legal and regulatory obligations.



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By “processing”, we mean the collection, recording, storage, use, disclosure and any other form of operations or dealing with your personal data.

In case of (a) above, you may withdraw your consent at any time, by making a request as set out in section 12 below.

3. WHAT PERSONAL DATA WE COLLECT ABOUT YOU

3.1 We process the following types of personal data about you:

- (a) Your name, email address and other contact details;
- (b) Your role, position and/or job title within your employment
- (c) Details of your preferences for types of marketing events or materials;
- (d) Details of your access to our premises, systems, websites; and
- (e) Your messages, feedback or contributions to surveys and questionnaires.

3.2 It may be mandatory for you to provide us with your personal data to enable us to manage our business and operations to fulfil our obligations to Member organisations, to maintain our relationship with you/your organisation, to provide our products or services to you/your organisation or to comply with our legal and regulatory obligations. If you fail to provide your personal data, we might be unable to maintain our relationship with you/your organisation or to provide our products or services to you/your organisation.

3.3 We make every effort to maintain the accuracy and completeness of your personal data which we store and to ensure all of your personal data is up to date. However, you can assist us with this considerably by promptly contacting us if there are any changes to your personal data or if you become aware that we have inaccurate personal data relating to you (see section 9 below). We will not be responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete personal data that you provide to us.

4. HOW WE COLLECT PERSONAL DATA

We usually collect your personal data from the information you/your organisation submits during the course of your/your organisation's relationship with us. This will typically be through you/your organisation sending us emails and other correspondence, business cards, the forms and documents used when you/your organisation joins the Network or signs up to our events or news lists, when you are named as an authorised person to act or trade on behalf of your organisation, the information you/your organisation provide to access any of our products or services either on your own behalf or on behalf of your organisation.

Our websites use cookies that collect information of the website user to help the site provide a better user experience.

We may also collect your personal data from other sources such as fraud prevention agencies and the records of governmental agencies.

5. HOW WE USE PERSONAL DATA

We will process your personal data in connection with the management of our relationship with you/your organisation and the provision of our products and services to you/your organisation for the following purposes:

- (a) to fulfil our obligations to our Members;
- (b) to provide you/your organisation with requested products or services;
- (c) to respond to your/your organisation's messages or posts to us;
- (d) to provide you/your organisation with promotional and marketing materials about our products and services that we think you/your organisation may be interested¹ which you have either opted in to receive or are a legitimate part of being a Member or an affiliate of the Network; and
- (e) to manage, develop and improve our products and services, information technology systems and websites;
- (f) for monitoring and assessing compliance with law and our policies and standards;
- (g) to comply with our legal and regulatory obligations and requests anywhere in the world, including reporting to and/or being audited by national and international regulatory bodies;
- (h) to carry out money laundering, financial and credit checks and for fraud and crime prevention and detection purposes;
- (i) for administrative purposes in relation to the security of and access to our systems, premises, platforms and websites and applications;
- (j) to comply with court orders and exercise and/or defend our legal rights;
- (k) for any other legitimate business purpose; and
- (l) as otherwise permitted or required by any applicable law or regulation

6. INTERNATIONAL TRANSFERS OF PERSONAL DATA

Your personal data may be transferred to (including accessed in or stored in) a country or territory outside the European Economic Area ("EEA"), including countries whose laws may not offer the same level of protection of personal data as are enjoyed within the EEA. We will ensure that any such international transfers are made subject to appropriate or suitable safeguards as required by the GDPR. You can obtain copies of the relevant safeguard documents by making a request as set out in section 12 below.

¹ Individual consent is generally required for direct marketing especially if it is outside of the scope of our Membership.

7. WHEN WE MAY DISCLOSE YOUR PERSONAL DATA

We do not and will not sell, rent out or trade your personal data. We will only disclose your personal data to the following recipients:

- (a) to other Members of Caritas Social Action Network and other legitimate stakeholders of the Network (such as bishops) as required;
- (b) to organisations approved by you;
- (c) to third parties who process your personal data on our behalf (such as our systems providers including cloud providers);
- (d) to third parties who process your personal data on their own behalf but through providing you or your organisation with a service on our behalf (such as our suppliers);
- (e) to companies providing services for money laundering checks, credit risk reduction and other fraud and crime prevention purposes and companies providing similar services, including financial institutions, credit reference agencies and regulatory bodies with whom such information is shared;
- (f) to any third party to whom we assign or novate any of our rights or obligations;
- (g) to any prospective buyer in the event we sell any part of our business or assets; and
- (h) to any government, regulatory agency, enforcement or exchange body or court where we are required to do so by applicable law or regulation or at their request.

8. HOW WE PROTECT YOUR PERSONAL DATA

We are committed to safeguarding and protecting your personal data and will implement and maintain appropriate technical and organisational measures to ensure a level of security appropriate to protect your personal data from accidental or unauthorised destruction, loss, alteration, disclosure or access. We comply with Cafod's IT and facilities security policies.

9. YOUR RIGHTS IN RELATION TO THE PERSONAL DATA WE COLLECT

9.1 If you wish to:

- (a) update, modify, or delete your personal data, or obtain a copy of your personal data that we hold; or
- (b) restrict or stop us from using any of your personal data which we hold,

you can request this by contacting us as set out in section 12 below.

9.2 In any of the situations listed above, we may request that you prove your identity by providing us with a copy of a valid means of identification in order for us to comply with our security obligations and to prevent unauthorised disclosure of data.

10. HOW LONG WE WILL HOLD YOUR PERSONAL DATA FOR

We will only retain your personal data as long as necessary to fulfill the purpose for which it was collected or to comply with legal, regulatory or internal policy requirements. In the case of Membership, this is normally the duration of the organisation's Membership plus six years.

11. HOW WE UPDATE OR CHANGE THIS FAIR PROCESSING NOTICE

We may change or update parts of this Notice to maintain our compliance with applicable law and regulation or following an update to our internal practices. We will do this by updating this Notice on our website at www.csan.org.uk/dataprivacy. You will not necessarily be directly notified of such a change. Therefore, please ensure that you regularly check this Notice so you are fully aware of any changes or updates.

12. HOW YOU CAN CONTACT US

If you have any queries about the contents of this Notice or your personal data, or wish to make a request in relation to your personal data, please contact us using the details set out below:

Email: dataprivacy@csan.org.uk

Post: Sandra Lawman
Data Privacy Lead, Caritas Social Action Network
Romero House, 55 Westminster Bridge Road, London SE1 7JB

13. HOW TO LODGE A COMPLAINT TO THE REGULATOR

You are entitled to lodge a complaint with the data protection regulator if you consider that we have breached your data protection rights. Our data protection regulator is the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.