



CATENIANS

# The Catenian Association Limited Privacy Policy

## 1. INTRODUCTION

Your privacy is important to The Catenian Association Limited. We are legally required to provide some of the information in this privacy notice under data protection laws which are in force in the UK and the European Union, however some of the information is provided for information purposes, rather than being a legal requirement. Whilst it is only a requirement for the Catenian Association to provide this privacy notice if you are based in the UK or the European Union, we aim to treat everyone equally, so we are also providing this privacy notice regardless of your geographic location and we aim to treat all personal information in the same manner.

You should read this privacy notice, but you do not need to agree or accept its contents or to confirm it has been received by you. It is simply a statement about the processing of your personal information. You should retain it for future reference, but further copies are available at [www.thecatenians.com/security/login/gdpr](http://www.thecatenians.com/security/login/gdpr) or you can request another copy from the Catenian Association.

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We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your membership with us. This notice applies to you if you have registered to become or are a member of the Catenian Association. This notice explains how we comply with the law on data protection, what your rights are and for the purposes of data protection we will be the controller of any of your personal information.

References to **we**, **our** or **us** in this privacy notice are to the; The Catenian Association Limited (registered company in England and Wales with no. 00894193) and its subsidiaries including Catenian Publications Limited (registered company in England and Wales with no. 04527148), The Catenian Association Bursary Fund Ltd (registered company in England and Wales with no. 02468843) and Catena Trustee Ltd (registered company in England and Wales with no. 00435288). This privacy notice also covers all parts of the Catenian Association Limited, including Circles, Groups, Provinces, National Bodies and the Councils and the various committees and other branches or parts of The Catenian Association Limited's organisation.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we are not required to do so, but our Data Protection Compliance Manager has overall responsibility for data protection compliance in our organisation. Contact details are set out in the "**Contacting us**" section at the end of this privacy notice.

## 2. PERSONAL INFORMATION WE MAY COLLECT FROM YOU

Depending on the type of membership you register for with us, (Member, Life Member, Honorary Member, Student etc.), and your role or position within The Catenian Association Limited (for example circle member, circle secretary, circle president, council member, council president etc.) you may provide us with or we may obtain **personal information** about you, such as information regarding your:

- personal contact details that allows us to contact you directly such as name, title, email addresses and telephone numbers, home address, work address;
- date of birth;
- gender, occupation, employment status, qualifications, decorations, ;
- circle membership and any positions/roles you hold
- membership start, renewals and end date and other organisations you belong to;
- references and other information included in the membership form or cover letter or submitted to a Circle Officer or as part of the application process for membership;
- records of your interactions with us such as telephone conversations, minutes of meetings, emails and other correspondence and your instructions to us;
- any credit/debit card, bank details and other payment details you provide so that we can receive payments from you, make payments to you and keep details of the financial transactions with you and also details of charitable donations;
- use of and movements through our online portal, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information;
- records of your attendance at any events or meetings hosted or arranged by us;
- images in video and/or photographic form and voice recordings;
- your marketing preferences so that we know whether and how we should contact you.
- identification documents such as passport and membership cards;
- details of any other related membership;
- details of next of kin, family members, Circle Officers and emergency contacts; and
- any disciplinary and grievance information.

### 3. SPECIAL CATEGORIES OF PERSONAL INFORMATION

We may also collect, store and use the following “**special categories**” of more sensitive personal information regarding you:

- information about your race or ethnicity and religious beliefs; and
- information about your health, including any medical condition, health and sickness updates

**We may not collect all of the above types of special category personal information about you.** In relation to the special category personal data that we do process we do so on the basis that

- the processing is necessary for reasons of substantial public interest, on a lawful basis;
- it is necessary for the establishment, exercise or defence of legal claims;
- it is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment and social security and social protection law; or
- based on your explicit consent.

In the table below we refer to these as the “special category reasons for processing of your personal data”.

We may also collect criminal records information about you. For criminal records history we process it on the basis of legal obligations or based on your explicit consent.

### 4. WHERE WE COLLECT YOUR INFORMATION

We typically collect personal information about our members when you apply to become a member of the Association, when you register an account (Portal access) with us at [www.thecatenians.com](http://www.thecatenians.com), when you purchase any services or products we offer, when you make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way.

We also may collect personal information about you from any third party references you provide as part of the application process for membership, or information you have provided directly to your Circle/ Group/ Province/ Area Secretary or other Officers for local events, anniversaries, meetings etc.

If you are providing us with details of referees, next of kin, beneficiaries, family members and emergency contacts they have a right to know and to be aware of how what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the “**Your rights in relation to personal information**” section below.

### 5. USES MADE OF THE INFORMATION

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

Purpose	Personal information used	Lawful basis
<p><b>To consider and accept/reject your membership application and once you have joined to administer any membership and/or role you have with us and managing our relationship with you, including for example, setting up your Member-only Portal, dealing with payments, expenses and any support, service or product (e.g. Catena magazine)</b></p>	<p>All contact and membership details, transaction and payment information, records of your interactions with us, and any other relevant personal information</p>	<p>This is necessary to enable us to properly manage and administer your membership contract with us and any role or position you hold in the Catenian Association.</p>
<p><b>To publish the Catenian directory containing details of members of the Catenian Association</b></p>	<p>Contact details and preferences.</p>	<p>Where you have given us your explicit consent to do so. Consent to include you in the Directory should be given via the member portal</p>
<p><b>To arrange and manage any contracts for the provision of any services or products (e.g. Catena, Regalia, Directories etc.</b></p>	<p>Contact details, transaction and payment information.</p> <p>Records of your interactions with us.</p>	<p>This is necessary to enable us to properly administer and perform any contract for the provision of any services and products you have purchased from us.</p>
<p><b>To send you information which is included within your membership benefits and package, including for example newsletters, details about any Governance changes, notices and information from your Circle, Group and Province, events and any updates on the Catena magazine, the Catenian Association Bursary or Benevolent Funds</b></p>	<p>Contact and membership details.</p>	<p>This is necessary to enable us to properly manage and administer your membership contract with us.</p>
<p><b>To deal with and manage your suggestions, queries, complaints and any legal claims</b></p>	<p>Contact details, records of your interactions with us and any other personal information we collect which is relevant</p>	<p>We have a legitimate interest to respond to any suggestions/queries, to provide complaint handling services and to deal with legal claims in case there are any issues with your membership.</p>
<p><b>Retention of records</b></p>	<p>All the personal information we collect.</p>	<p>We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records in order to properly administer and manage your membership and run the Association and in some cases we may have legal or regulatory obligations to retain records.</p> <p>We process special category personal data on the basis of the “special category reasons for</p>

		processing of your personal data” referred to in section 2 above.
<b>The security of our IT systems</b>	Your usage of our IT systems and online portals.	We have a legitimate interest to ensure that our IT systems are secure.
<b>For the purposes of obtaining your opinion and attitudes about changes within the Catenian Association or events or meetings you may have attended in order to analyse and improve our work and organisation.</b>	Records of your attendance at any events. Answers provided in the survey/questionnaire tools or emails used to obtain this data	We have a legitimate interest in doing so to ensure that our membership is targeted and relevant.
<b>To comply with health and safety requirements</b>	Records of attendance, at Head Office/ Circle/ Provincial meetings, the AGM, events, health and safety related information and other personal information	We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate  We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.
<b>To administer your attendance at any Circle/Group/Province/Council meeting and/or any AGM</b>	All contact and membership details, transaction and payment data	This is necessary to enable us to register you and properly manage and administer your attendance
<b>To arrange for any trip or transportation to and from a Catenian Association organised event e.g. Conference, Pilgrimage, Tour etc.</b>	Identification documents details of next of kin, family members and emergency contacts, transaction and payment information, health and medical information.	This is necessary to enable us to make the necessary arrangements for the trip and/or transportation to an event.  We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.
<b>To gather evidence for possible grievance or disciplinary/ expulsion hearings</b>	All the personal information we collect	We have a legitimate interest in doing so to provide a safe and fair environment for all members and to ensure the effective management of any disciplinary hearings, appeals and adjudications.  We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.
<b>To comply with any legal obligations, for example, regarding people working with</b>	Any personal information we collect about you, which may include	We process it on the basis of legal obligations or based on your explicit consent.

<b>children or vulnerable adults to comply with our safeguarding requirements</b>	Information about your criminal convictions and offences	
<b>For the purpose of processing your donations to either the Catenian Association Bursary or Benevolent Fund, or any other charitable fund raising event organised by the Catenian Association</b>	All contact and membership details, transaction and bank details	This is necessary to enable us to properly administer and perform the recording of donations with the charities and submit/claim the Gift Aid portion from HRMC
<b>For the purpose of seeking support, assistance or prayers for you</b>	Contact details and relevant personal information which may include medical or health related information	Where you have given us your explicit consent to do so. This will usually be at Circle level
<b>Storage of records relating to you and also records relating to the Catenian Association</b>	All the personal information we collect	To be able to manage and fulfil the membership contract with you, we may have a legal obligation to do so and we also have a legitimate interest to keep proper records

For some of your personal information you will have a legal, contractual or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to admit you as a member or we may not be able to properly perform our contract with you or comply with legal obligations and we may have to terminate your membership. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our contract with you.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "**Contacting us**" section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain member benefits to you.

## 6. **DIRECT MARKETING**

We do not generally carry out any direct marketing, almost all of our contact with you concerns your membership of the Catenian Association and the benefits that are included in or relate to that membership. These are therefore not classed as direct marketing as they are part of being a member of the Catenian Association.

However from time to time, we may contact you by email, post or SMS with information about events, products and services we believe you may be interested in which are not part of your membership of the Catenian Association.

We will only send these marketing messages to you in accordance with the marketing preferences you have given us. This can be at Circle, Province or National level. You can also then let us know at any time that you do not wish to receive marketing messages by contacting Head Office we will also give you the opportunity to opt out of receiving them in any marketing message we send to you.

## 7. **DISCLOSURE OF YOUR PERSONAL INFORMATION**

We share personal information with the following parties:

- **Any party approved by you.** This may include for example other members generally (e.g. by inclusion in the Catenian Directory), other members of your Circle;
- **To any governing bodies or Circle, Provincial Officers covered by the Catenian Association, or to Catenian Publications Limited, The Catenian Association Bursary Fund Ltd and Catena Trustee Ltd:** to allow them to properly administer the events, local Membership, Catena monthly magazine subscription, Donations, Volunteer work on a local, national and international level.

- **Other service providers and sub-contractors:** for example, email marketing specialists, payment processors, promotional advisors, contractors or suppliers and IT services (including CRM, website, video- and teleconference services);
- **The Government or our regulators:** where we are required to do so by law or to assist with their investigations or initiatives.
- **Police, law enforcement and security services:** to assist with the investigation and prevention of crime and the protection of national security.

## 8. TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY

The personal information we collect may be transferred to and stored in countries outside of the UK and the European Union. Some of these jurisdictions require different levels of protection in respect of personal information and, in certain instances, the laws in those countries may be less protective than the jurisdiction you are typically resident in. We will take all reasonable steps to ensure that your personal information is only used in accordance with this privacy notice and applicable data protection laws and is respected and kept secure and where a third party processes your data on our behalf we will put in place appropriate safeguards as required under data protection laws. For further details please contact us by using the details set out in the "**Contacting us**" section below.

Our officers, representatives and other individuals working for us may in limited circumstances access personal information outside of the UK and European Union if they are on holiday abroad outside of the UK or European Union. If they do so they will be using our security measures and will be subject to their arrangements with us which are subject to English Law and/or European Union law and the same legal protections that would apply to accessing personal data within the UK and European Union.

In limited circumstances the people to whom we may disclose personal information as mentioned in the section "Disclosure of your personal information" above may be located outside of the UK and European Union. In these cases we will impose any legally required protections to the personal information as required by law before it is disclosed.

If you require more details on the arrangements for any of the above then please contact us using the details in the "**Contacting us**" section below.

However, if you are a Member outside of the UK or European Union the personal information we collect will be sent to and stored in countries outside of the UK and the European Union, but within the corresponding National Councils and Provinces within the Catenian Association. Some of these jurisdictions require different levels of protection in respect of personal information and, in certain instances, the laws in those countries may be less protective than the jurisdiction you are typically resident in.

Regardless of the jurisdiction you are based in, and whether or not you are covered by UK or European Union data protection laws, we will aim take all reasonable steps to ensure that your personal information is only used in accordance with this privacy notice and applicable data protection laws and is respected and kept secure and where Councils, Provinces and Circles process your personal information on our behalf we will put in place appropriate safeguards as required under data protection laws. For further details please contact us by using the details set out in the "**Contacting us**" section below.

## 9. HOW LONG DO WE KEEP PERSONAL INFORMATION FOR

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement we retain all physical and electronic records for a period 7 years after your last contact with us or the end of your membership due to legal and financial record keeping requirements. Exceptions to this rule are:

- Details regarding unsuccessful membership applicants where we hold records for a period of not more than 2 years from the date of the decision.
- Where in order to continue and preserve the historic archives of the Catenian Association we retain first name, last name, circle, join date and end date for past members with no limit on time. For further details please contact us by using the details set out in the "**Contacting us**" section below.
- Information that may be relevant to personal injury or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after the event.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address. You may be able to update some of the personal information we hold about you through your membership portal,

or via your Circle Secretary. Alternatively, you can contact us by using the details set out in the "**Contacting us**" section below.

#### 10. **YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION**

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "**Contacting us**" section below.

If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

#### 11. **CHANGES TO THIS NOTICE**

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. Please refer to the Members Area of our website for the latest version. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

#### 12. **CONTACTING US**

In the event of any query or complaint in connection with the information we hold about you, please email [dataprotection@thecatenians.com](mailto:dataprotection@thecatenians.com) or write to us at Data Protection Compliance Manager, The Catenian Association, 2<sup>nd</sup> Floor 1 Park House, Station Square, Coventry CV1 2FL, United Kingdom.

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