

Privacy Policy Notice

1 INTRODUCTION

Welcome to the Churchmarketplace Ltd Privacy Policy Notice.

- 1.1 **How to access this Privacy Notice:** This Privacy Notice has expandable and collapsible sections. To open or close a section, please move your cursor over the main section number and then click on the arrow that is to its left. For this first section, please click the arrow next to 1.1.
- 1.2 **About Churchmarketplace:** Churchmarketplace is a private company limited by guarantee registered in England & Wales with company number 08030748 with registered address Vaughan House, 46 Francis Street, Westminster, SW1P 1QN. Churchmarketplace is the trading subsidiary of Stewardship in the Catholic Church, a charitable incorporated organisation with charity number 1161392. In this Notice, references to 'we' and 'us' mean Churchmarketplace.
- 1.3 **Data Controller:** For the purpose of the General Data Protection Regulation 2016/279 (GDPR), Churchmarketplace, through its directors, will be a Data Controller in respect of your Personal Data. In some cases, Churchmarketplace may be a joint Data Controller of your Personal Data (e.g. where your data is shared between Churchmarketplace and another organisation for a particular purpose. e.g. Official Suppliers to Churchmarketplace's buying group).
- 1.4 **Registration:** Churchmarketplace is registered to Process data under the Data Protection Act 1998 and registration number is **A8328233**.
- 1.5 **Purpose of this Privacy Notice:**
 - 1.5.1 When you provide us with Personal Data in order to engage with us and/or benefit from our activities and services, we will keep a record of the data you give to us in order to enable us to comply with our statutory obligations and to achieve our operational activities.
 - 1.5.2 Everyone has rights with regard to how their Personal Data is handled by organisations. Churchmarketplace is committed to ensuring that Personal Data is properly and securely managed in accordance with the relevant data protection laws, and believes this is an important part of achieving trust and confidence between us and those with whom we interact. Please read this Notice to understand how we use and protect the information that you provide to us or that we obtain or hold about you, and to understand what your rights are in relation to information that we hold. This Notice applies to information about living identifiable individuals only.
- 1.6 **This Privacy Notice applies to:**

- 1.6.1 information we collect about visitors to the Churchmarketplace Website and users of the Churchmarketplace service and its Suppliers; please note:
- 1.6.2 this Website is not intended for children and we do not knowingly collect data relating to children.
- 1.8 **DPO:** The Churchmarketplace DPO is Mathew D'Souza, contactable at Vaughan House, 46 Francis Street, Westminster, SW1P 1QN, mathewdsouza@rcdow.org.uk.

2 THE DATA WE COLLECT ABOUT YOU

2.1 **Visitors to the Public Website:** When you visit and browse the Churchmarketplace Public Website (i.e. not the members area) at www.churchmarketplace.org.uk, we may collect the following types of Personal Data: internet protocol (IP) address, including where available your operating system and platform, browser type and version, time zone setting and location, and other technology on the devices you use to access our Website. We use web beacons and cookies which you can read more about in [section 6](#).

2.2 **Registering as a member/using your account/contacting us or our Suppliers directly:** In registering for a membership account via our Website at www.churchmarketplace.org.uk and using the member area of the Website, and/or our service and Suppliers, we may collect the following types of Personal Data:

2.2.1 **Identity & contact data** – includes your title, name, position, and work contact details (telephone, email, address, organisation name);

2.2.2 **Profile data** – includes your username and password for your Churchmarketplace account, and certain account information (account name, number, password) for accounts we set up with third parties e.g. with our Suppliers, your preferences, feedback and survey responses;

2.2.3 **Usage data** - information about your current involvement in Churchmarketplace activities and events including how you use our Website, products and services.

2.2.4 **Technical data** - information we collect through your use of our Website(s) such as IP addresses including where available your web browser type and version, time zone setting and location, operating system and platform, login data, other technology on the devices you use to access our Website, and other information is collected e.g. which web pages you have visited, using cookies and web beacons, which you can read more about in [section 6](#);

2.2.5 **Marketing and communications data** - this includes your marketing preferences from us and third parties and your communications preferences; and

2.2.6 any other information which you choose to provide to us when communicating with us.

2.3 **Third parties:** We may also receive Personal Data about you from third parties, for example:

2.3.1 **Identity and contact data** –e.g. from the diocese in which you are located or from our Suppliers

2.3.2 **Enquiry & transaction data** – e.g. from our Suppliers following goods and service enquiries you have made with them directly or for the supply of goods and services that you have procured; and

2.3.3 **Profile data** – e.g. account reference number on sales reports with our Suppliers or account details when Supplier accounts are opened on your behalf by us.

2.4 **Aggregated data:** We also collect, use and share Aggregated Data such as statistical or demographic data to accomplish our company aims. Aggregated Data may be derived from

your Personal Data but is not considered Personal Data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific Website feature. However, if we combine or connect Aggregated Data with your Personal Data so that it can directly or indirectly identify you, we treat the combined data as Personal Data which will be used in accordance with this privacy notice.

- 2.5 **Special categories of Personal Data:** This includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. Whilst limited, in collecting your title when you register, this may reveal your religious belief, as well as the organisation for which you are a representative. We may also hold information about your dietary requirements if you share this with us when attending a catered event that we run.
- 2.6 **If you fail to provide Personal Data:** Where we need to collect Personal Data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3 HOW WE USE YOUR PERSONAL DATA AND THE LAWFUL BASIS FOR PROCESSING IT

- 3.1 Below, and in the table, we set out how we use your Personal Data and the lawful basis for Processing it. We will only use your Personal Data when the law allows us to. Most commonly, we will use your Personal Data in the following circumstances:
- 3.1.1 Where we need to perform the contract we are about to enter into or have entered into with you;
- 3.1.2 Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; and
- 3.1.3 Where we need to comply with a legal or regulatory obligation.
- 3.2 Note that we may Process your Personal Data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to Process your Personal Data where more than one ground has been set out in the table below.
- 3.3 **Cookies:** By visiting our Website, you agree to our use of cookies, IP address and web beacons and other similar technology. To read more about cookies and how to manage them, including disabling cookies, [click here](#). However, disabling cookies may mean some parts of this Website may become inaccessible or not function properly.
- 3.4 **Marketing & Promotional offers from us:**
- 3.4.1 **Consent:** Generally, we do not rely on consent as a legal basis for Processing your Personal Data. We do not send third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by [contacting us](#) or by changing your message alerts on the 'My Account' tab of your Churchmarketplace account, then 'My email alerts'.
- 3.4.2 **Standard marketing:** We are always conscious of not bombarding our members with marketing emails. In general, we send out a monthly mailer with news and offers, and in addition for Educational Establishments, send out a weekly strategy and news email.

- 3.4.3 **Awareness campaigns:** In addition, we may use your Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you. We may send, when pertinent, an awareness campaign email.
- 3.4.4 **Changing your marketing preferences and opting out:** You can change your marketing preferences by going to the 'My Account' tab when logged in on the Churchmarketplace Website, then 'My email alerts'.
- 3.4.5 **Account management emails:** Opting out of marketing messages does not close your account with us. Therefore, unsubscribing will not apply to any communication using Personal Data provided to us in respect of contracts you have in place with us or our Suppliers concerning a product/service purchase, warranty registration, product/service experience or other transactions, or other aspects of management of your account. The legal basis for this is for (a) performance of a contract with you and (b) Necessary for our legitimate interests.
- 3.4.6 **Third party marketing:** We do not send third party direct marketing communications to you via email or text message or provide your data to third parties. However, where you purchase goods or services from approved Suppliers introduced to you through your membership with us, your relationship with the Supplier will be governed by your contractual agreement with them and they may seek your consent for third party marketing activities.

Purpose/Activity	Data type used	Lawful basis for Processing
To register you as a new customer	-Identity -Contact -Profile	(a) Performance of a contract with you
To answer an enquiry, provide a quotation, Process, record and deliver your order, register and remedy a case or complaint	-Identity -Contact -Transaction -Profile -Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover rebate due to us from Suppliers)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review, give feedback or take a survey	-Identity -Contact -Profile -Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in an event or meeting (with or without catering), prize draw, competition or complete a survey	-Identity -Contact -Profile -Usage -Marketing and Communications -Special categories of DP	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)

		(c) Consent (e.g. dietary requirements)
To administer and protect our business and this Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	-Identity -Contact -Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation) (b) Necessary to comply with a legal obligation
To deliver relevant marketing and Website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	-Identity -Contact -Profile -Usage -Marketing and Communication -Technical	(a) Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our Website, products/services, marketing, customer relationships and experiences	-Technical -Usage	(a) Necessary for our legitimate interests (to define types of customers for our products and services, to keep our Website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	-Identity -Contact -Technical -Usage -Profile	(a) Necessary for our legitimate interests (to develop our products/services and grow our business)

3.5 **Special Categories of Personal Data:** If we Process any Special Categories of Personal Data, we must have a further lawful basis for the Processing, provided that the legal basis is proportionate to the aim pursued and provides for suitable and specific measures to safeguard your rights, or as part of our legitimate interests as a Catholic organisation. This may include:

- 3.5.1 where you have given us your explicit consent to do so (e.g. to cater for your medical or dietary needs at an event);
- 3.5.2 where the Processing is necessary to protect your vital interests or someone else's vital interests (e.g. passing on information to the Police);
- 3.5.3 you have made the information public (e.g. School business manager names on school Websites; head teacher names on the government's education Website);
- 3.5.4 where the Processing is necessary for the establishment, exercise or defence of legal claims;
- 3.5.5 the Processing being necessary for reasons of substantial public interest (e.g. where steps are taken to prevent fraud or other dishonest activity).

3.6 **Change of purpose:**

- 3.6.1 We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the Processing for the new purpose is compatible with the original purpose, please [contact us](#).
- 3.6.2 If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
- 3.6.3 Please note that we may Process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

4 WHO WILL WE SHARE YOUR INFORMATION WITH?

- 4.1 We will only use your Personal Data within Churchmarketplace for the purposes for which it was obtained, unless you have explicitly agreed that we may share your Personal Data with another organisation or unless we are otherwise permitted or required to under the Data Protection Rules or order of a Court or other competent regulatory body or as set out in this Notice.
- 4.2 **Third parties** that we may share your information with when you use the Churchmarketplace service and its Suppliers:
 - 4.2.1 when you register with Churchmarketplace, an account with our Stationery Supplier (Office Depot) will be automatically opened for you. We will share with them your name, place of work and address, and work contact details;
 - 4.2.2 when you visit some of our Suppliers' Websites (e.g. Safelincs, Phoenix) via the Churchmarketplace Website, your account details (name, place of work and work contact details) will automatically be shared with these Suppliers to enable them to know you are a Churchmarketplace member and to buy at Churchmarketplace member pricing, and to enable delivery and invoicing;
 - 4.2.3 when you submit an online enquiry to Suppliers via the Churchmarketplace Website, your account details, as listed above, are automatically shared with the Supplier so that they can respond to you directly;
 - 4.2.4 when you contact us and request a quote or other service information from our Suppliers, your account details will be shared with the Supplier. If you prefer, you have the option to have initial quotes returned from the Supplier via Churchmarketplace so that you do not have to disclose your name and work contact details to the Supplier in the first place;
 - 4.2.5 Taycliff Ltd runs, maintains and hosts the Churchmarketplace public and member Websites, and member database, with whom cookies, IP addresses, browser information, Website activity via web beacons and member Personal Data (name, place of work, work address, role, telephone number, email and Website activity) is Processed and stored. Taycliff is fully compliant with GDPR legislation and data protection security in accordance with the General Data Protection Regulation (EU) 2016/679, as adopted into law of the United Kingdom in the Data Protection Act 2018;
 - 4.2.6 for some services (e.g. telecommunications, furniture), when cases and complaints arise, we may share your details with our procurement consultants who are involved jointly with us in Supplier monitoring and management;
 - 4.2.7 we may share your information with government bodies or health providers for law enforcement agencies for the prevention and detection of crime and for health emergencies; and

- 4.2.8 we may share your information with the diocese in which you are located for statistical purposes, strategy planning and service advancement;
- 4.3 We have in place administrative, technical and physical measures designed to guard against and minimise the risk of loss, misuse or unauthorised Processing or disclosure of the Personal Data that we hold.
- 4.4 **International Transfers:** Should we transfer your Personal Data out of the EEA, we will ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:
- 4.4.1 We will only transfer your Personal Data to countries that have been deemed to provide an adequate level of protection for Personal Data by the European Commission. For further details, see European Commission: Adequacy of the protection of Personal Data in non-EU countries.
- 4.4.2 Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to Personal Data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

5 HOW LONG WILL WE KEEP YOUR INFORMATION?

- 5.1 We will endeavour to only keep Personal Data for as long as is necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting or reporting requirements.
- 5.2 To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we Process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.
- 5.3 Churchmarketplace will not retain your Personal information for longer than necessary. We will hold onto the information you provide either while your account is in existence, or as long as needed to be able to provide the Services to you, or (in the case of any contact you may have with our Admin/Support team) for as long as is necessary to provide support-related reporting and trend analysis only.
- 5.4 Churchmarketplace members requesting their accounts to be closed may have Contact and Identity data and any Special category data anonymised, should this not be required for any legal, reporting or accounting requirements.
- 5.5 If legally required or if it is reasonably necessary to meet regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our Terms and Conditions, we may also retain some of your information for a limited period of time as required, even after you have closed your account or it is no longer needed to provide the Services to you, otherwise Personal Data will be anonymised.
- 5.6 Sensitive Personal Data, such as dietary requirements, are deleted as soon as they are no longer needed e.g. following an event.

6 COOKIES

- 6.1 Cookies, also known as browsers or tracking cookies, are small text files that are added to your computer when you visit our website. They help websites to perform certain functions e.g. to know who you are if you log into a restricted part of a website, and for tracking purposes.
- 6.2 Churchmarketplace uses the following cookies:

- I. We may use persistent or session cookies on our website to analyse website traffic and your navigational patterns through the website to compile anonymous, aggregated statistics that allow us to understand how people use our Website (this helps us improve the design and content of the Website for visitors, assists us in our marketing initiatives and helps us identify what areas of the Website are of particular interest to users.
 - II. We use a tracking cookie, which is added to your computer, to remember your cookie preferences i.e. if you have allowed or disallowed them.
- 6.3 Any information gathered through cookies and similar technologies via the Churchmarketplace Website is used to measure and analyse information on visits to the Website, to tailor the Website to make it better for visitors, and to improve technical performance. We will not use the data to identify you Personally or to make any decisions about you.
- 6.4 **Managing Cookies:**
- 6.4.1 If you would like to opt-in or opt-out of using cookies, then you should be able to do so using your browser. You can review your cookie settings at any time.
 - 6.4.2 Please note that you cannot opt-out of the deployment of cookies that are necessary for delivery of our Website or services to visitors.

7 YOUR RIGHTS

- 7.1 You have rights in respect of the Personal Data you provide to us. In particular:
- 7.1.1 the right to request a copy of some or all of the Personal Data that we hold about you (including, in some cases, in a commonly used, machine readable, format so that it can be transferred to other Data Controllers). We do not make a charge for this service;
 - 7.1.2 if we Process your Personal Data on the basis that we have your consent, the right to withdraw that consent;
 - 7.1.3 the right to ask that any inaccuracies in your Personal Data are corrected;
 - 7.1.4 the right to have us restrict the Processing of all or part of your Personal Data;
 - 7.1.5 the right to ask that we delete your Personal Data where there is no compelling reason for us to continue to Process it;
 - 7.1.6 the right to object to us Processing your Personal Data for direct marketing purposes e.g. in relation to service offers and news or awareness campaigns carried out by Churchmarketplace; and
 - 7.1.7 the right not to be subject to legal or other significant decisions being taken about you on the basis of an automated Process (i.e. without human intervention).
- 7.2 Please note that the above rights may be limited in some situations – for example, where we can demonstrate that we have a legal requirement to Process your Personal Data. Also, we may need you to provide us with proof of identity for verification and data security purposes before you can exercise your rights.
- 7.3 Rights may only be exercised by the individual whose information is being held by Churchmarketplace or with that individual's express permission.

8 CHANGES TO THIS NOTICE & YOUR DUTY TO INFORM US OF CHANGES

- 8.1 This version was last updated on 24th May 2018.
- 8.2 We may make changes to this Notice from time to time as our organisational practices and/or applicable laws change. We will not make any use of your personal information that is inconsistent with the original purpose(s) for which it was collected or obtained (if we intend to do so, we will notify you in advance wherever possible) or otherwise than is permitted by data protection laws.
- 8.3 It is important that the Personal Data we hold about you is accurate and up to date. Please keep up informed if your Personal Data changes whilst you are a member or user of our Service.

9 CONTACT DETAILS

- 9.1 **The DPO contact details:** If you have any questions, require further information about how we protect, use or share your Personal Data, if you wish to exercise any of the above rights or if you would like to provide feedback or make a complaint about the use of your information, please contact our Data Protection Officer (DPO): **Mathew D'Souza, Vaughan House, 46 Francis Street, Westminster, SW1P 1QN, mathewdsouza@rcdow.org.uk.**
- 9.2 Any complaints will be dealt with in accordance with Churchmarketplace's Complaints Policy.
- 9.3 We hope that we can satisfy any queries you may have about the way in which we Process your Personal Data. However, if you have unresolved concerns you also have the right to complain to the Information Commissioner ('ICO') (www.ico.org.uk).
- 9.4 **Contacting Churchmarketplace:** You can contact us via enquiries@churchmarketplace.org.uk or by calling 020 7798 9175 or writing to us at Vaughan House, 46 Francis Street, Westminster, SW1P 1QN.

10 GLOSSARY

"Data Controller" means a person, organisation or body that determines the purposes for which, and the manner in which, any Personal Data is Processed. A Data Controller is responsible for complying with the data protection laws including the GDPR and establishing practices and policies in line with them.

"Data Processor" means any person, organisation or body that Processes Personal Data on behalf of and on the instruction of the Diocese. Data Processors have a duty to protect the information they Process by following data protection laws.

"Data Subject" means a living individual about whom the Diocese Processes Personal Data and who can be identified from the Personal Data. A Data Subject need not be a UK national or resident. All Data Subjects have legal rights in relation to their Personal Data and the information that the Diocese holds about them.

"Personal Data" means any information relating to a living individual who can be identified from that information or in conjunction with other information which is in, or is likely to come into, the Diocese's possession. Personal Data can be factual (such as a name, address or date of birth) or it can be an opinion (e.g. a performance appraisal). It can even include a simple email address. A mere mention of someone's name in a document does not necessarily constitute Personal Data, but Personal details such as someone's contact details or salary (if it enabled an individual to be identified) would fall within the definition.

"Processing" means any activity that involves use of Personal Data. It includes obtaining, recording or holding the information or carrying out any operation or set of operations on it,

including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring or disclosing Personal Data to third parties.

"Special Categories of Personal Data" (previously called sensitive Personal Data) means information about a person's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health or condition or sexuality. It also includes genetic and biometric data. Special Categories of Personal Data can only be Processed under strict conditions and such Processing will usually, although not always, require the explicit consent of the Data Subject.
