

Privacy Notice

Membership, marketing and events

Relevant to:

- Employees / directors at CSA member companies
- Employees / directors at former CSA member companies
- Employees / directors at applicant CSA member companies
- CSA event participants – including speakers, attendees, sponsors, awards nominees and exhibitors
- Individuals who have been contacted about a CSA event / service / product
- Individuals who have requested information about a CSA event / service / product

The CSA group of companies comprises Credit Services Association Limited and CSA (Services) Ltd, both of which process personal data. We respect your privacy and are committed to protecting your personal data.

This notice is intended to help you understand our processing of personal data and your rights when we process it. It sets out how we are going to use that personal data, including how long we'll hold it for and the reason we are processing it. But if you have any questions about the processing that this document doesn't answer, please feel free to contact us using the details given at section 1.4 of this notice.

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1. Who we are

- 1.1 This notice is issued on behalf of the CSA group of companies - Credit Services Association Limited and CSA (Services) Ltd (**collectively "the CSA"**). Throughout this notice, references to "the CSA", "we", "us" or "our" are references to the CSA group of companies.
- 1.2 Credit Services Association Ltd is the only national UK trade association for the debt collection and debt purchase industry. We represent the industry to key stakeholders, including regulatory bodies and government, set out best practice for the industry and provide guidance and support to member companies.
- 1.3 CSA (Services) Limited is a wholly-owned subsidiary of Credit Services Association Ltd, which provides training and development services to both member and non-member companies in relation to debt collection, debt purchase and associated activities.
- 1.4 The CSA can be contacted using the following details:

Credit Services Association
2 Esh Plaza
Sir Bobby Robson Way
Great Park
Newcastle-upon-Tyne
NE13 9BA

0191 271 0775
info@csa-uk.com
www.csa-uk.com

- 1.5 The CSA does not have a data protection officer, but you can speak to our Senior Compliance Manager, Russell Collins, if you have any questions in relation to this notice or concerns about any data protection issues. You will find more details about your data protection rights in section 7 of this notice.

2. What is personal data

- 2.1 *Personal data* is information about a living person, by which that living person can be identified, either directly (i.e. the information itself identifies the person) or indirectly (i.e. whoever holds the data can identify the person by combining the information with another piece of information to which they have access).
- 2.2 In addition to *personal data*, there are also *special categories of personal data*, which demand stronger protection measures. These include data relating to a living person's health, sex life, sexual orientation, race, ethnic origin, political opinion, religion, membership of a trade union, and genetic or biometric data.
- 2.3 When it comes to processing special categories of personal data, we will only process this where:
- we have your explicit consent to process the data
 - we must process the data to carry out a legal obligation
 - we must process the data for reasons of substantial public interest
 - you have already made the data public
- 2.4 In circumstances where we have asked for your consent to process special category personal data, we will be clear about precisely what we intend to use the data for.
- 2.5 When we ask for consent, you have full control over the decision to give or withhold consent; furthermore, you will continue to have control afterwards too and can withdraw it at any time. If you decide to withdraw consent, please be aware that this could impact our ability to provide the applicable service or product.

3. The personal data we process about you

- 3.1 This notice is relevant to the following people:
- Employees / directors at CSA member companies
 - Employees / directors at former CSA member companies
 - Employees / directors at applicant CSA member companies
 - CSA event participants – including speakers, attendees, sponsors and exhibitors
 - Individuals who have been contacted about a CSA event / service / product
 - Individuals who have requested information about a CSA event / service / product
- 3.2 The types of personal data we process may vary depending upon the context, including your relationship with us and the purpose(s) for our processing.
- 3.3 The types of personal data we may process include:

TYPES OF PERSONAL DATA

Identification	name, date of birth, gender, job role
Contact	address, e-mail address, telephone number (work and/or personal)
Payment and purchase history	payment details; previous attendance at or involvement in CSA events; enrolment in CSA training programmes
Social media	information from social media profiles - LinkedIn; Twitter; YouTube - including posts, likes, direct messages and groups
Image	photographs or videos taken at events; meeting recordings

- 3.4 We may also process some special categories of personal data (see sections 2.2 and 2.3 of this notice for more information about special categories of personal data). This may include:

SPECIAL CATEGORIES OF PERSONAL DATA

Health information / documentation	disability information; dietary requirements
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- 3.5 In the vast majority of cases, we will collect this data from you – for example, when you book to attend one of our events, or when your company applies for or renews its CSA membership.
- 3.6 Depending on our relationship with you, we may also collect data from third parties who have appropriate authority to share information about you. This may include your employer, credit reference agencies and clients.
- 3.7 From time to time, we may also use third party services to collect business contact data from publicly-available sources. Such collection would be focused solely on those we consider would have a reasonable interest in our events, products or services.

4. Why we process your personal data

- 4.1 We process your data for a variety of purposes. We have set out below the different purposes for which we may process your personal data.
- 4.2 Where this involves special categories of personal data, we have underlined references to this type of data, for ease of reference.

PURPOSES FOR PROCESSING

Communication	To communicate with / respond to you.
Record keeping	To maintain adequate and up-to-date records
Legal and regulatory requirements	To meet all legal and regulatory requirements – including data protection and health and safety.
Improving services	To monitor and improve our products and services.
Accessibility and support	We may process <u>special category personal data</u> (e.g. health information) to ensure we make any necessary adjustments for those with disabilities.
Dietary requirements	We may process some <u>special category personal data</u> (e.g. health information) to ensure that any allergies or dietary requirements are taken into account at events, meetings or training courses.

Monitoring equality and diversity	To monitor equality and diversity among staff and within our service provision. This may involve <u>special category personal data</u> (e.g. ethnicity). Wherever possible, we will aim to anonymise information used for this purpose.
Membership application	Assess applicants' suitability and eligibility; be able to evidence the suitability / eligibility assessment; maintain record of declined applications
Membership administration	Provide all features of membership; enable renewal of membership; enable members to exercise their rights as CSA members, such as voting; assist with investigation of complaints made against members
Financial	Invoicing for products and services; processing of amounts payable to the CSA
Provision and promotion of services / products	Provide the service or product (membership; event; webinar) as set out in sales material; invite individuals to relevant events hosted by the CSA; alert individuals to relevant information / services / products; accurately document event output
Request support	Obtain member or stakeholder support for relevant CSA initiatives e.g. consultation responses; statistics for lobbying; expert insight.

4.3 Where we plan to process personal data for a purpose other than those set out above, and which you would not reasonably expect, we will notify you before any processing for that new process occurs.

4.4 When we process personal data, we will always have legal grounds to do so. Data protection law sets out the different legal grounds that allow companies to process personal data, which include:

- processing in order to perform or fulfill a contract we have with you
- processing where we have a legal duty
- processing which is within our legitimate interests
- processing where there is a public interest reason
- processing where you have given us your consent

4.5 As outlined at sections 2.3 and 3.2 of this notice, we may process some special categories of personal data. Where we process this type of data, we need to have a stronger legal basis for that processing. In most cases, we will rely on one of the following legal grounds for processing this type of personal data:

- We have a legal obligation to process the personal data
- The processing is required in the public interest, such as for equal opportunities monitoring
- We have your explicit consent for the processing – this will set out clearly what we will do with the personal data and, as with ordinary consent, you will have the right to withdraw consent.
- The processing is necessary to protect you or another person from harm.

4.6 Below we have clarified our legal basis in the various contexts in which we process personal data.

LEGAL BASIS FOR PROCESSING

Contract	We will process personal data in order to supply the product or service in accordance with the contract / terms and conditions with you.
Legal requirement	We may process some personal data to ensure compliance with various legal requirements, including:

- Satisfying health and safety obligations
- Prevention of fraud
- Making reasonable adjustments for those with disabilities

Legitimate interests

We will also process personal data so that we can carry out activities that are in the CSA's legitimate interests, including:

- Ensuring we accurately represent the industry and the membership
- Meeting our aims to improve the integrity of the industry
- Recovering any amounts due to us (membership fees; penalties; invoices)
- Assessing suitability for membership
- Alerting individuals to events, products and services we believe may be of interest to them
- Managing our relationship with member companies
- Meeting the requirements of the terms of membership
- Incorporating event images into CSA promotional materials

We will subject these legitimate interests to a legitimate interests assessment to ensure we have considered the legitimate interests, the necessity of the processing and whether individual's interests override the legitimate interest.

5. What we do with your personal data

- 5.1 The CSA will not sell, loan or otherwise exchange your details with third party companies for marketing purposes.
- 5.2 We will only share your information where:
- We need to for the purposes of providing you with the services you have requested
 - We have a public or legal duty to do so *e.g. meeting our legal and regulatory obligations such as fraud prevention and data protection*
 - We have a legitimate reason for doing so *e.g. assessing your suitability for membership*
 - We have asked for your permission to share it and you have agreed
- 5.3 We may occasionally share your data with trusted third parties to help us deliver efficient and quality services, which may include:
- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you, and to support the delivery of our services, including the provision of our website(s), storage of personal data and responding to communications
 - Fraud and crime prevention agencies who will use it to prevent fraud and money laundering
- 5.4 The following table explains any relevant data sharing arrangements and who we may share your data with.

DATA SHARING

At events, name and company information may be disclosed to relevant parties such as premises providers for security and health and safety purposes. It may also be necessary to share dietary requirements with premises providers to ensure these can be accommodated.

At events, name, job title and company information may also be shared with other event attendees through name badges, table plans and delegate lists.

Images from events may be shared as part of CSA promotional materials.

We may record some virtual presentations / meetings and make the recording - or notes based on the presentation / meeting - available to CSA members.

Data about CSA members, applicants and event participants will be shared with our Customer Relationship Management system provider, Hubspot, which we use to manage records.

Some member contact data may be made public in the member directory on the CSA website to enable customers and potential clients to make contact. Members and applicants will identify any public-facing information at the point of application or renewal, or through management of the company's online profile.

- 5.5 We have detailed below a non-exhaustive list of some of the organisations with whom we share data or who provide services to us that involve the processing of personal data. Please note that the links to external privacy notices are correct as at the date of this notice.

DATA SHARING RELATIONSHIPS		
Organisation	Service	Privacy notice
Hubspot	Customer Relationship Management system for CSA membership, Events apprentices, employers and marketing contacts	HubSpot: Privacy Policy
Hunter.io	Provider of business contact data	Hunter.io: privacy notice
Zoom	Video conferencing platform	Zoom: Privacy notice
Xero	Accounting system	Xero: privacy notice

- 5.6 Where we share data with third parties or where we use third party systems to store data, we will take necessary precautions to ensure that the third parties have appropriate data protection measures in place.

- 5.7 The majority of personal data we hold is stored in the UK on cloud-based storage. We also store some hard copy data in our office in the UK.

- 5.8 The CSA, or some of our partners or service providers, may pass information outside of the UK and the European Economic Area (EEA) into jurisdictions where privacy laws, obligations and rights may vary. In such cases, we will always ensure that appropriate assurance checks and measures are put in place to protect your privacy and that transfers are limited to countries which are recognised as providing an adequate level of protection or where we can be satisfied that appropriate alternative arrangements are in place to protect your privacy rights.

- 5.9 The below table outlines whether your data may be stored outside the UK or the EEA and, where this is the case, the protections in place.

DATA STORAGE
Some member, applicant and event participant data will be stored on our customer relationship management system provided by Hubspot, whose servers are based in the US.
To ensure that this data receives an adequate level of protection, we have put in place contractual arrangements with the organisation using the European Commission approved Standard Contractual Clauses.

Marketing contact data will be stored on a different customer relationship management system provided by Hubspot, with data stored in the Germany.

5.10 The length of time that we retain personal data will vary depending on our relationship with you, our purpose for processing the data and whether we have any statutory or regulatory obligations to retain data for a particular period.

5.11 The following table explains how long we will keep processing your personal data.

DATA RETENTION
Personal data is retained as long as necessary to provide information about the industry, including key industry developments, relevant events and training, and details of lobbying activities.
It will be deleted upon request, unless we need to keep data for monitoring future membership applications or to comply with any legal requirements.
All marketing communications can be easily 'opted out' either by contacting us on the details at 1.4, selecting 'unsubscribe' in email communications or, where you have a CSA online profile, by managing your communication preferences online.

6. Automated decision-making and profiling

6.1 The CSA does not make automated decisions.

6.2 The CSA does not carry out profiling, but we do segment CSA member employees based on role / job title to ensure the appropriate distribution of relevant information and updates. This segmentation / the updates that you receive can be managed via the member company online profile.

7. Your data protection rights

7.1 The individuals whose personal data we process have several rights. These rights include the right of access to the personal data we process.

7.2 Where we process your data on the basis of consent or the performance of a contract, we may be required to provide some of your personal data to you in a portable format, or to another data controller on your behalf. Only data that you have provided to us is subject to this right. If you would like to exercise this right, please contact us by e-mail, in writing or on the telephone.

7.3 You also have other rights including:

- The right to have inaccurate data corrected. If you know or believe that we are processing inaccurate information about you, you have the right to have that corrected.
- The right to object to our processing. This will depend on whether we have a valid legal basis to process your data.
- The right to request that we restrict the data we process, or even have it deleted. Again, this will depend on the circumstances – we are not always required to delete

your data or restrict our processing, if we can demonstrate we have a valid legal basis for processing it.

- 7.4 If you wish to exercise any of your data protection rights, please contact us so that we can act on your request or explain why we will be continuing to process the data we hold. You can contact us with your request by email, in writing or by telephone using the details given at section 1.4 of this notice.
- 7.5 These rights are subject to some exemptions. Where we cannot act on your request, we will provide a relevant explanation about our processing of your personal data in a timely manner.

8. Making a complaint

- 8.1 If you would like to complain about our data processing, please contact us by e-mail, in writing or by telephone with details of your complaint.
- 8.2 Data protection is regulated in the UK by the Information Commissioner's Office (ICO). You can complain to the ICO about our processing, but we would always welcome the opportunity to address any concerns with you first.
- 8.3 If you want to know more about data protection, or if you want to complain about our processing of personal data, you can contact the ICO via the details below:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

0303 123 1113

- 8.4 You can also report concerns about companies' use of your personal data to the Information Commissioner's Office here: <https://ico.org.uk/concerns/>

9. Changes to this notice

- 9.1 From time to time, we will review this document, for example, where there are changes to laws or regulations, or where we make substantial changes to our processes, procedures or systems.
- 9.2 In such cases, we will update this notice to reflect the relevant changes and we will make reasonable efforts to contact and update those affected, if the changes are substantial in nature.

Contact us

T: 0191 217 0775
E: info@csa-uk.com

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2 Esh Plaza
Sir Bobby Robson Way
Great Park
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NE13 9BA

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