



## Catholic Children's Society: Privacy Notice

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At the Catholic Children's Society we rely on the generosity and support of private individuals to carry out our work helping disadvantaged children and families. That is why we want to be completely transparent about our use of the personal information we collect, use and hold when you become involved in our work, whether you are supporting us or we are supporting you. This includes those who:

- Donate to us or fundraise for us
- Apply for employment / volunteering opportunities / trusteeships
- Supply professional services or otherwise have professional relationships with us
- Seek and receive assistance through our Crisis Fund
- Receive mental health and bereavement support / training services, including school staff
- Access our website

*Please read this Notice carefully as it provides information about the different types of personal information that we collect and how we will use it, including where it is collected via our website [www.cathchild.org.uk](http://www.cathchild.org.uk). If you have any questions please contact us using the contact details included at section 1.*

We have specific notices explaining how we use your information in relation to some of our services:

- You can find our notice for Post Adoption and Aftercare services here:  
<https://www.cathchild.org.uk/wp-content/uploads/2018/09/Pathways-Post-Adoption-Aftercare-Privacy-Notice.pdf>
- We have specific notices for our ConnectEd Mental Health Service, St Marks Stay & Play, and St Francis Family Centre. If you would like a copy of any of these notices, please contact us using the contact details included at section 1.

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## 1. **Who we are and how to contact us**

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The Catholic Children's Society (Westminster) is a UK registered company (company number 00085235) at registered address 73 St. Charles Square, London. W10 6EJ. We are also a registered charity in England and Wales (charity number 210920) and we are registered with Ofsted as an adoption support agency (under unique reference number SC441470).

If you have any questions about how we use your personal information and how we comply with our responsibilities, please contact us as follows:

- Email: [info@cathchild.org.uk](mailto:info@cathchild.org.uk)
- Call: 020 8969 5305
- Write to us at 73 St. Charles Square, London. W10 6EJ

## 2. **Sources of personal information**

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We may hold personal information relating from a number of sources and will collect personal information about you:

- (a) When you give it to us **directly**  
For example, personal information that you submit by contacting us (including through our website) or any personal information that you share with us when you communicate with us in person, by email, phone or post.
- (b) When we obtain it **indirectly**  
Your personal information may have been shared with us by third parties, for example, a head teacher making an application to our Crisis Fund, to help you and your family.
- (c) When we obtain it from **publicly available sources**  
We may carry out searches using social media networks and other online sources that are in the public domain to verify your details, such as your postal address (for more information see section 10(c) below).
- (d) When you visit our **website**, we automatically collect:
  - (i) Technical information, including the IP address used to connect your device to the internet, browser type and version, time zone setting, browser plug-in types and versions and operating systems and platforms.
  - (ii) Information about your visit to the websites, including the uniform resource locator (URL) clickstream to, through and from the website (including date and time), services you viewed or searched for, page response times, download errors, length of visits to certain pages, referral sources, page

interaction information (such as scrolling and clicks) and methods used to browse away from the page.

We also collect and use your personal information by using cookies on our website – please see our [cookie notice](#).

### 3. **Special categories of data**

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Data protection law recognises certain categories of personal information as sensitive and therefore requiring more protection. These categories of data include information about your race or ethnic origins, political opinions, sex life or sexual orientation, religious beliefs and health data. Additionally there are further rules concerning the use of criminal data. We will only process this data if there is a valid reason for doing so and where the law allows us to do so, for example, for the purposes of monitoring equal access to services.

Dietary and access requirements with respect to attendance at training, fundraising events or other such events may be collected. In these cases, we rely upon your explicit consent for us to process the limited special category data necessary to ensure that we can meet your dietary or access requirements.

### 4. **The reasons for using personal information**

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We use personal information for the following purposes:

- Provision of the information or services requested
- Communications in relation to our services
- Management and administration of our services
- Raising further awareness of the work we do
- Raising further funds to support our work
- Keeping a record of support provided
- Manage the contact preferences of those who we approach for support
- Managing and processing applications (whether for employment, volunteering opportunities, school services, therapeutic services, training provision) or any other enquiries
- Learning how to improve our services including evaluation of our work programmes, services, activities or information
- To comply with our professional, regulatory or legal obligations

### 5. **Lawful processing**

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We are required to rely on one or more lawful grounds to collect and use the personal information that we have outlined above. We consider the grounds listed below to be relevant:

(a) **Legitimate interests**

Where applicable law allows us to collect and use personal information for our or a third party's legitimate interests, and the use of your personal information is fair, balanced and does not unduly impact your rights.

We rely on this ground to process your personal information when we believe that it is more practical or appropriate than asking for your consent. Where you contact us regarding a donation, we will rely on the legitimate interest ground to communicate with you in most instances.

(b) **Consent**

Where we ask for your consent for our use of your personal information for a specific purpose. You always have the right to withdraw your consent.

(c) **Contract**

Where it is necessary to use your personal information to fulfil a contract with you or to take steps at your request prior to entering into one.

(d) **Legal obligation**

Where the processing of your personal information is necessary for us to comply with a legal obligation to which we are subject.

## 6. **Do we share your personal information?**

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We may disclose your personal information to selected third parties processors (such as agents or sub-contractors) for the purposes outlined at section 4. The third party in question will be required to use any personal information they receive in accordance with our instructions. This may include for:

- (a) the purposes of secure back up storage
- (b) sending printed material (newsletters, updates, magazines, appeals)
- (c) securely processing Standing Orders through our bank
- (d) securely processing donations from online giving platforms

We reserve the right to disclose your personal information to third parties:

- (a) in the event that we buy or sell any business or assets, in which case we will disclose your personal information to the prospective buyer or seller or such business or assets;
- (b) if substantially all of our assets are acquired by a third party, personal information held by us may be one of the transferred assets;
- (c) if we are under any legal or regulatory obligation to do so; and
- (d) in connection with any legal proceedings or prospective legal proceedings, in order to establish, exercise or defend our legal rights.

Where it is necessary for the purposes of the proper management of the organisation, personal information may be shared or available to our professional advisors e.g. lawyers, accountants and IT consultants.

We may also use third party on-line services to communicate with those to whom we provide services, including counselling, support and training. For example, we may use Zoom / Skype for Business / Ring Central on-line meeting services to facilitate training sessions. Where we use such on-line services, you may be able to join the on-line meetings without creating an account. If you wish to create a user account, you may be required to provide your name and contact details for the purposes of setting up a user profile and using this service. As a user, the on-line service will keep information about you such as your account settings, contact details, user preferences, technical information, metadata and approximate location , as well as contents of any on-line chat services or voice mail messages. We will not request the recording or transcription of the content of these communications by the on-line service without the specific consent of all attendees at any on-line meeting.

## 7. **We will not share your data for others' marketing purposes**

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You will never receive marketing from other companies or organisations as a result of giving your details to us. We may need to share limited information with our service providers who help us to prepare and send you our communications or process your donations and other responses. However,

we do not allow these organisations to use your data for their own purposes and we take care to ensure that they keep your personal information secure, and delete it when it is no longer needed.

## 8. **When we will get in touch with you**

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When you give us your personal details you may receive follow up information from us directly, including thank you letters and information on how your support is helping. Some of these communications are administrative (for example to confirm Gift Aid details or to provide you with information to assist your role as a volunteer, fundraiser or Parish Advocate) but others are marketing or fundraising focussed - we will only contact you via email or SMS with marketing materials if you have provided specific consent for us to do so. We will contact you with marketing material by post on the basis that it is in our legitimate interests to do so ([see section 10 below](#)).

We provide easy ways to stop our marketing communications, and **you can opt out at any time**. It is important to us that we always act on your instructions so you are in control of your relationship with us. Our aim is to communicate with you in a way that makes you want to continue supporting our work.

## 9. **How to stop or change how we communicate with you**

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If at any time you wish to stop or change how we communicate with you, or update the information we hold, please do get in touch, using one of the following options:

- Email: [info@cathchild.org.uk](mailto:info@cathchild.org.uk)
- Call: 020 8969 5305
- Write to us at 73 St Charles Square, London. W10 6EJ.
- To opt out of emails, click on the unsubscribe link at the bottom of our messages

Where you opt out of receiving communications from us by email or post, we will retain your details with respect to any purchase or donation in line with our usual retention periods with respect to financial transactions.

## 10. **Donations, fundraising and other support**

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### a. **What details we use and why**

There are minimum levels of information we need to obtain for different purposes - such as donating money or signing up to Gift Aid. We always ask for your name and title so we know how to talk to you. We need to be able to confirm any transactions you make on our website by sending you an email, which is why this field is mandatory on all our web forms. We will separately seek your permission to use this for our wider marketing communications. We ask for your house number and postcode so that we hold a valid postal address for you. We need this information for the following reasons:

- To set up Direct Debits and one-off card payments
- To claim Gift Aid
- To deliver items to you (items you have purchased or event materials for example)
- To send you relevant information about our work

### b. **What we do with your personal information**

We currently have data for approximately 4,000 individuals who have supported our work in some capacity over the last 10 years. This includes home addresses, phone numbers and email addresses.

We will continue to add new individuals to our database who have supported us in some capacity. We use this information for the following purposes:

- To provide you with the information or services you have requested, and communicate with you in general
- To analyse, evaluate and improve our work, programmes, services, activities or information
- To provide updates on our work
- To request donations
- To thank donors for their support
- To sell Christmas cards
- To assist your work as a Parish Advocate or as a volunteer for us
- To recruit and communicate with event participants
- To ensure we are not contacting people who have told us not to
- To administer legacies
- To claim gift aid on donations
- To conduct administrative tasks such as confirming Christmas cards have been posted, donations have been received, feedback has been addressed etc.
- For research purposes
- For the prevention of fraud or misuse of services

**c. Donor research and data cleansing**

We may also:

- Analyse your personal information to create a profile about you, your interests and preferences. To do this, we may combine information that you have given us with other information that is publicly available (for example, from public records or open social media). This may include information about wealth and propensity to give. This provides background information about our supporters and helps us to tailor appropriate approaches to individuals in the hope of securing donations. Researching potential new donors ensures we make targeted approaches that engage with individuals who have the capacity to give and are likely to have an interest in our cause. The efficacy of this approach, and the benefits to the donor, is supported by extensive research and allows for more efficient and effective use of our charitable resources.
- 'Cleanse' the data we hold – this means we may check the information we have such as contact details, against publicly available sources in order to check that it remains accurate and up to date. We may use a third party to do this.

*You can always opt out of your personal information being used in this way at any time by contacting us using the details at [section 1](#) above.*

**d. Your debit/credit card details**

If you make a donation on our website, or purchase something from our shop, we will never store your debit/credit card details. These payments are processed via an online payments service called Stripe, who will take all of the payment details. Stripe's privacy policy can be found here – [www.stripe.com/gb/privacy](http://www.stripe.com/gb/privacy).

## 11. Crisis Fund

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We operate a Crisis Fund which provides immediate financial support for families facing a crisis in their lives. Applications from head teachers and parish priests are actioned by the organisation and retained in accordance with our retention policy for a period of 7 years.

## 12. Recruitment and applications

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When you apply to work with Catholic Children's Society Westminster, whether as a staff member or as a volunteer, we will record your details as provided in CV/Application Form and covering letter,. These details will be retained for 12 months after the applicant progressing to interview stage. Should your application be successful, on appointment all required right to work checks and, potentially, a check with the Disclosure and Barring Service will be carried out. Details of these checks (or the results from them) will be retained on your HR record.

If you apply to work with us as a volunteer, we will only ever use the information you provide, and references from your chosen referees, to assess and progress your application and contact you regarding volunteer opportunities.

## 13. International Data Transfers

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As we sometimes use third parties to process personal information, it is possible that personal information we collect from you will be transferred to and stored in a location outside the UK or the European Economic Area (**EEA**).

Please note that certain countries outside of the UK or EEA have a lower standard of protection for personal information, including lower security protections. Where your personal information is transferred, stored, and/ or otherwise processed outside the UK or EEA in a country which does not offer an equivalent standard of protection to the UK or EEA, we will take all reasonable steps necessary to ensure that the recipient implements appropriate safeguards designed to protect your personal information. For instance we may use on-line service providers and cloud providers to store personal information who have servers in the US and are signed up to the Privacy Shield. If you have any questions about the transfer of your personal information, please contact us using the details at [section 1](#).

## 14. How long do we keep your personal information?

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We will keep your personal information in accordance with the applicable periods within our retention policy.

If you would like further information about this, please contact us using the details at [section 1](#).

## 15. Your rights

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We explain how you can update your communication preferences above at [section 9](#) above. Where we rely on your consent, you have the right to withdraw your consent at any time.

When we use your personal information you have the right to:

- Ask us for **confirmation** of what personal information we hold about you, and to request access to a copy of that information. If we are satisfied that you have a right to see this personal information, and we are able to confirm your identity, we will provide you with this personal information.

- Request that we **erase** the personal information we hold about you, as far as we are legally required to do so.
- Ask that we **correct** any personal information that we hold about you which you believe to be inaccurate.
- **Object** to the processing of your personal information where we: (i) process on the basis of the legitimate interests ground; (ii) use the personal information for direct marketing; or (iii) use the personal information for research purposes.
- Ask for the provision of your personal information in a machine-readable format (the **data portability** right) to either yourself or a third party, provided that the personal information in question has been provided to us by you, and is being processed by us: (i) in reliance on your consent; or (ii) because it is necessary for the performance of a contract to which you are party; and in either instance, we are processing it using automated means.
- Ask for processing of your personal information to be **restricted** if there is disagreement about its accuracy or legitimate usage.

There are exceptions which apply to these rights, which we will explain in our response to you. Should you have any concerns or complaints with respect to the way we use your personal information, please contact us (using the contact details in section 1) in the first instance so that we may address your concerns.

You also have the right to lodge a complaint with the Information Commissioner's Office at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns).

## 16. **Updating this Privacy Notice**

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We may update this Notice. If we update this Notice in a way that significantly changes how we use your personal information, we will bring these changes to your attention where reasonably possible. Otherwise, you can access the latest version of this Notice on our website.