

## Christian Supply Chain Buying Group Ltd (CSCBG) Privacy Policy

Respecting you and the data you share with us is really important to us. This Privacy Notice sets out the ways in which we use your personal information, your rights and the options available to you.

Christian Supply Chain Buying Group (UK) Limited (registered company 02646074) is committed to protecting your privacy. We aim to respect any personal information you share with us, or that we receive from others, and keep it safe.

Certain personal information will be required by us in order to fulfil our obligations when providing membership and other services; without it, your use of our services may be impaired. Otherwise the provision of your personal information to us is voluntary.

### 1. When do you collect information about me?

#### **a. When you give it to us directly**

For example, personal information that you submit through our website e.g. when joining; in order to allow your organisation to use our services, enquire about a supplier or when you communicate with us by email, phone or letter.

#### **b. When we obtain it indirectly**

For example, your personal information may be shared with us by third parties that we choose to use e.g. suppliers or referred by other Christian organisations or members. Where we have not already done so, we will notify you when we receive such personal information.

#### **c. When other organisations have permission to share it or it is available publicly**

In the course of supplying services, we may receive personal data provided by suppliers. Your personal information may also be available to us from external, publicly available sources.

#### **d. When you visit our website**

When you visit our website, we may collect the following types of personal information:

- Technical information, including the IP address used to connect your device.
- Details about your visit to our website, e.g. the URL clickstream to, through and from the website, services you viewed, page response times, etc.

### 2. What personal information do you use?

We may collect, store and use the following categories of personal information:

- Your name and contact details, including address, telephone number and email address;
- Your position in an organisation, and the work that you do there;
- Any purchase history or financial information supplied to us by your organisation
- Any purchase history or financial information from your organisation as provided to us by our suppliers
- Information about our services which you use/which we consider may be of interest;
- Any other personal information which you choose to share with us or we obtain.

### 3. Why do you need my personal information?

We collect and use your personal information in the following ways:

#### **a. To administer and provide services**

When you enquire about our products, services, or suppliers we use information about you:

- To confirm to our suppliers, you are a member thus ensuring you can place orders directly with them and receive their products and services at our pre-agreed buying group terms.
- Your purchase history provided by you to enable us to complete any benchmarking or sales analysis. In some instances, this may be shared with our suppliers to help facilitate this exercise.
- Your purchase history and financial information as received from our suppliers to help us track and monitor sales
- To contact you by post, email or by phone to make you aware of our suppliers and relevant products and services (e.g. for new suppliers, promotions, supplier updated information, invoice and order queries, benchmarking, quotations and responses to tenders);
- To administer our website, emails and CRM system to keep it updated, secure and ensure that content is presented in the most effective manner.
- Once you order direct from our suppliers your personal data, purchase history, confidential and financial data will be stored on their systems to allow you to continue ordering and receive any relevant marketing or promotions from them.
- To communicate your details to CSCBG Gold suppliers (Max 7) and for the appropriate ones to contact you directly with the pre-agreed contracted offers. You can unsubscribe from them at any point.
- To fulfil regulatory responsibilities required of us when providing those services.

We cannot provide the services unless we use the information about you in this way.

#### **b. Do what we are required to do by law**

Sometimes we are required by law to use information about you:

- To help prevent and detect crime (e.g. the prevention or detection of fraud); and
- To comply with a legal or regulatory obligation.

#### **c. To inform you about and promote our other activities**

We will also contact you to keep you up-to-date with other CSCBG activities, products and services through our suppliers that we think may be of interest to you. You can change this consent and opt-out at any time by contacting the office at [buy@cscbg.org.uk](mailto:buy@cscbg.org.uk) or calling 01908 663958

We can use your personal information in this way because it is in our legitimate interests to provide you with the right information at the right time, to look at ways of extending our relationship with you.

#### **4. Who might you share my information with?**

We will disclose some of your information to suppliers and statutory bodies in order to provide our services to you. Those parties may include statutory bodies (e.g. HMRC or Charity Commission); payment processors; email marketing providers, etc.

**We do not sell your personal data or information to any third party organisations.**

#### **5. How long will you hold a record of my information?**

We keep your data for as long as it is necessary to provide the services that you have asked for, and to meet our legal obligations to HMRC and other bodies. As a general rule, we will keep your data for seven years from the end of your relationship with us. However, if before that date (i) your personal information is no longer required in connection with such purpose(s), (ii) we are no longer lawfully

entitled to process it, or (iii) you validly exercise your right of erasure (see section 7), we will remove it from our records at the relevant time.

## 6. What are my rights?

- Where we rely on your consent to use your personal information, you have the right to withdraw it at any time. This includes the right to ask us to stop using it for marketing purposes, or to unsubscribe from our email list or website at any time.
- You have the right to ask for a copy of the information we hold about you. If there are any discrepancies in the details we provide, please let us know and we will correct them.
- If you want to access your information, send a description of the information you want to see and proof of your identity by post to CSCBG UK Ltd, Unit 8 Castle House, Dawson Road, Milton Keynes MK1 1QT. We do not accept these requests by email, so we can ensure that we only provide personal information to the right person.

If you have any questions, please contact us on 01908 664958 or [buy@cscbg.org.uk](mailto:buy@cscbg.org.uk) For further information, see the Information Commissioner's guidance at [www.ico.org.uk](http://www.ico.org.uk)

## 7. Other important information

### 7.1 Security and storage of personal information

CCSBG is committed to keeping your personal information safe and secure. We have proportionate security policies and organisational and technical measures in place to help protect your personal information.

Where your personal information is given to one of our suppliers in pursuance of an enquiry you have made that supplier becomes the Data Controller responsible for processing that personal information. Any enquiry or concern about the use of that personal information should be directed to that supplier

### 7.2 Lawful basis for processing your personal information

The GDPR requires us to rely on one or more "lawful basis" to use your personal information. We consider the bases listed below to be relevant:

- Where you have provided your consent for us to use your personal information in a certain way (for example, to send you monthly email bulletins).
- Where necessary for the performance of a contract to which you are a party (for example, if you apply to use one of our suppliers or undertake a transaction with them).
- Where there is a legitimate interest in us doing so, such as if it is reasonably necessary to achieve our or others' legitimate interests (as long as that use is fair, balanced and does not unduly impact your rights).

In broad terms, our "legitimate interests" means the running of CCSBG as a legal entity and pursuing our aims and ideals, for example to provide a range of products and services through our range of suppliers. In such cases, we consider and balance any potential impact on you and your rights under data protection laws.

### 7.4 Links and third parties

We link our website directly to other sites. This Notice does not cover external websites or our suppliers. We are not responsible for the privacy practices or content of those sites or our suppliers. We encourage you to read the privacy policies of any external websites or any of our suppliers you visit or use via links on our website or direct with them.

## 8. Changes to This Notice



We may update this Notice from time to time. We will notify you of significant changes by contacting you directly where reasonably possible for us to do so and by placing an updated notice on our website. This Notice was last updated on 10 May 2018.