

# THE CATENIAN ASSOCIATION BENEVOLENT & CHILDREN'S FUND

*Registered in England: Charity number 214244*

## PRIVACY STATEMENT TO APPLICANTS & BENEFICIARIES

### Introduction

The Trustees of the Catenian Association Benevolent & Children's Fund (the "Benevolent Fund") are committed to ensuring that confidentiality and sensitive treatment of your personal information are ingrained into their processes and procedures. They will follow six guiding principles concerning your privacy. Personal information will be:

1. Collected for the purposes of determining your eligibility to receive help, the type and amount of help appropriate and for the administration of loans and grants; and for no other purpose.
2. Accurate, relevant and only what is necessary for the above purposes.
3. Accurate and up to date when it is used for decision making or administration.
4. Kept for no longer than is necessary.
5. Kept secure.
6. Stored in systems designed set up to give limited access to data to maintain confidentiality.

### What type of personal information we collect

We collect the following types of information from you:

- contact details,
- financial situation, and
- additional information supplied by you in support of your application for assistance.

### How we collect the information

The information we hold is principally provided by you in the application form and any supplementary information provided by you. We may also collect information from publicly available sources.

### Where we collect your information

The information that we have comes either from you directly, or from you but via a member of your Circle Benevolent Board or the Director of your Province.

### How we use your information

We use your information only to administer your grant application, and for no other purpose.

### Legal basis

The use of your information for the purposes set out above is lawful because one or more of the following applies:

- Personal information is held solely and lawfully to enable the Trustees help persons in need and is essential for that purpose. It is therefore in the legitimate interests of the Trustees and you that we hold such data in order that we can progress your application for funding.
- By fulfilling its charitable objects to help persons in need, the Charity is fulfilling its public interest function.
- By completing and signing the application form, you will have given consent to us using the information for that purpose, based on the way that you provided the information to us. You may withdraw consent at any time by emailing us at either of the email addresses shown at the end of this document. This will not affect the lawfulness of processing of your information prior to your withdrawal of consent being received and acted upon.

### Data Controller

The Data Controller responsible for compliance with Data Protection Regulations is Catena Trustees Ltd ("CTL"). CTL is the Custodian Trustee of the Benevolent Fund. The Trustees of the Benevolent Fund are the members and Directors of CTL.

### Recipients of personal information

The Catenian Association Ltd acts as a Data Processor in the following limited functions:

- Archived paper files and backup copies of electronic files are held in secure conditions at the Catenian Head Office;
- CTL's financial system is operated by the Financial Administrator at Head Office including processing of payments to and from beneficiaries of the Benevolent Fund.

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- Correspondence is occasionally received at Head Office addressed to the Benevolent Fund. This is forwarded immediately to the Clerk to the Trustees. No copies are made.
- Members of your Circle Benevolent Board (including your Provincial Director) may from time to time hold personal information provided by you when advising on or preparing an Application or re-application, or in connection with a Loan Review.
- Directors and other senior officers of the Catenian Association occasionally attend meetings of the Trustees as guests for the purpose of better understanding of the proceedings. They may therefore have sight of papers relating to applicants outside of their own Province. They do not receive such papers before the meeting nor do they take them away after the meeting. They are formally reminded by the Chairman of the meeting of the need for confidentiality.

The work of the Catenian Association Ltd on behalf of CTL is regulated by a formal Agreement that requires the former to adhere to the principles and practices within this Privacy Statement.

### Applicants and beneficiaries outside of the European Economic Area (EEA)

CTL is subject to English law on Data Protection. If you are not resident in the EEA the same safeguards apply when sending personal information across borders as they are within England. These include sending by secure postal services including couriers and if by email by means of password protected attachments only.

### Retention policy

Your personal information is held in individual paper and electronic files. Your file is retained as an open file for as long as an application is under consideration or a loan has been made and is outstanding. Your file will be archived when an application is withdrawn, declined, a grant paid or a loan previously made is repaid. An archived file will be re-opened only if a further application is received or at your request for information.

Your archived file will be retained for a maximum of ten years so long as you remain eligible for further help from the Benevolent Fund. Otherwise, the file will be destroyed four years after the last transaction on the file, or four years after your death or when you cease to be a member of the Catenian Association; whichever is the earlier.

### Your rights

You have the right to:

- request disclosure of the information held about you,
- require correction of inaccurate information,
- removal of irrelevant information and deletion of all information if it is being held without compliance with this retention policy, and
- restrict the way in which we are dealing with and using your information.

### Data loss

If at any time the Trustees believe that the personal information they hold about you has been obtained by anyone other than Trustees or recipients described above, they will inform you as soon as possible and in any event within the time limit set for the time being by law.

### Questions, concerns and complaints

Questions, concerns and complaints should in the first instance be addressed to the Clerk to the Trustees. If the matter relates to the Clerk's actions or lack thereof then it should be addressed to the Chairman of the Trustees. Contact details are below. If matters cannot be resolved satisfactorily you have the right to complain to the Information Commissioner's Office at [www.ico.org.uk](http://www.ico.org.uk).

### Contact details

Clerk to the Trustees: Phil Roberts, 39 Beechfield, Hilldale, Lancs WN8 7AR  
Email – [phil@robertsreal.com](mailto:phil@robertsreal.com)  
Chairman of Trustees: Peter Devine, 36 Heath Rd., Upton, Chester CH2 1HX  
Email – [pjpd1956@hotmail.com](mailto:pjpd1956@hotmail.com)

This Privacy Statement was approved by the Trustees on 27th March 2018.