

Privacy Notice

Membership & Marketing

Both the Credit Services Association Limited and CSA (Services) Ltd (**collectively “the CSA”**) process personal data. We respect your privacy and are committed to protecting your personal data.

This notice is intended to help you understand all about 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.

1. Who is the CSA?

- 1.1 This notice is issued on behalf of the CSA group of companies - Credit Services Association Limited and CSA (Services) Ltd.
- 1.2 Credit Services Association Limited 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) Ltd is a wholly-owned subsidiary of Credit Services Association Limited which provides training and development services to both our member and non-member companies in relation to debt collection, debt purchase and associated activities.
- 1.4 The CSA’s contact details are as follows:

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 employ a data protection officer, but you can speak to our Head of Regulatory Compliance & Standards, Claire Aynsley, or our Compliance Manager, Daniel Spenceley, 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 10 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).

- 2.3 In addition to ordinary 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.
- 2.4 We will not routinely collect special category data about you. There may be occasions where we ask you for special category data. In such circumstances, we will ask for your consent and 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; you will continue to have control afterwards too and can withdraw it at any time.

3. What types of personal data does the CSA process?

- 3.1 As a membership organisation, the CSA holds personal data about some employees, directors and owners of its member companies.
- 3.2 We also process personal data about attendees, sponsors, exhibitors and speakers at CSA events. Furthermore, we process personal data about key industry stakeholders, such as representatives from government, regulators and other trade bodies.
- 3.3 We will process identification and contact information, which will include name and title, addresses, e-mail addresses and telephone numbers.
- 3.4 We will also process payment information, which will commonly be company-specific, but might also include personal payment details (e.g. individual's company credit card; sole trader's bank account). We will record information about products purchased, which will include events and training courses attended.
- 3.5 If you use social media and connect to one of the CSA's accounts, we may process your social media personal data. Presently, the CSA only uses the following social media platforms: Twitter; Linked In, YouTube.

4. What does the CSA do with my personal data?

- 4.1 This personal data will be used for several purposes, depending on your relationship with the CSA. Those purposes include:
 - to process an application for membership, including reviewing the suitability of the applicant
 - to provide relevant information about the work of the CSA
 - to request support for CSA initiatives, such as providing input into consultation responses or sharing statistics to help lobbying efforts
 - to assist with the investigation of and respond to complaints against member companies
 - to invite individuals to relevant events hosted by the CSA
 - to enable member companies to exercise their rights as members of the CSA

- to administer member companies' membership of the CSA
 - to promote our products and services, namely our events and training
- 4.2 If we want to process your personal data for a new purpose which is substantially different to those described above, and for a purpose which has not previously been communicated to you in this notice, we will let you know first, before such processing begins. In such circumstances, we will update this notice and we will make reasonable efforts to contact you directly to advise of the change.
- 4.3 We collect personal data about you either from you or from a representative at the member company who is authorised to share information.
- 4.4 We may obtain personal data regarding key credit industry stakeholders from public sources, such as the stakeholder's website.

5. What are the legal bases for the CSA's processing activities?

- 5.1 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:
- in order to perform a contract that we are party to
 - in order to carry out legally required duties
 - in order for us to carry out our legitimate interests
 - to protect your interests
 - where something is done in the public interest
- 5.2 Where we process personal data about member employees, directors and owners, membership applicants, key industry stakeholders and event participants, we will do so on the basis of legitimate interests. The legitimate interests being pursued here are:
- Ensuring we accurately represent the industry and the membership by getting relevant input
 - Meeting our aims to improve the integrity of the industry (for example, by communicating key updates to members and industry stakeholders; providing a complaint facility to support the Association's Code of Practice)
 - Recovering any amounts due to us (membership fees; penalties; event attendance)
 - Assessing suitability for membership
 - Making individuals aware of products and services that we believe may be of interest to them
 - Managing our relationship with member companies
 - Meeting the requirements of the terms of membership
- 5.3 We will also process personal data about event participants in order to provide the product purchased in accordance with our contract.

6. Who is my data shared with?

- 6.1 The CSA will not sell, loan or otherwise exchange your details with third party companies for marketing purposes.
- 6.2 We will only share your information where:
- We need to for the purposes of providing you with products or services you have requested
 - We have a public or legal duty to do so e.g. to assist with detecting fraud and tax evasion
 - We have a legitimate reason for doing so e.g. to assess your suitability for services
 - We have asked you for your permission to share it and you have agreed.
- 6.3 We may occasionally share your data with trusted third parties to help us deliver efficient and quality services. This 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 the website, storage of personal data and responding to communications
 - Fraud prevention agencies who will use it to prevent fraud and money laundering
 - Analytics and search engine providers that assist us in the improvement and optimisation of the website.
- 6.4 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.
- 6.5 Some member contact data is made public in the member directory on the CSA website so that potential clients and customers can make contact with the member company. When applying for or renewing membership, members provide contact information for this purpose.
- 6.6 At CSA events, name and company information may be disclosed to relevant parties (e.g. premises providers) for security and health and safety purposes. Name and company information will also be disclosed to other event attendees, for example through name badges, table plans and delegate lists.

7. Where is personal data stored?

- 7.1 A large amount of personal data is stored on our internal server hosted in the UK.
- 7.2 Whenever we transfer information outside of the UK and the European Economic Area (EEA) into jurisdictions where privacy laws, obligations and rights may vary we will always ensure that appropriate assurance checks and measures are put in place to protect your privacy and

we will also point this out to you in specific privacy notices for that product or service, if applicable.

7.3 We transfer the personal information we collect about you to the United States of America (“US”) which is where our Customer Relationship Management servers are located. There is an adequacy decision by the European Commission in respect of that country. This means that the US is deemed to provide an adequate level of protection for your personal information.

7.4 To ensure that your personal information does receive an adequate level of protection we have put in place the following appropriate measures to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the EU and UK laws on data protection:

- contractual arrangements governing data protection and ensuring the EU-US Privacy Shield framework is incorporated and complied with.

7.5 If you require further information about our protective measures, you can request it by contacting us on the details at 1.4.

8. How long is personal data kept for?

8.1 Personal data will be kept as long as necessary to provide information about the industry, including key industry developments, relevant events and training, and details of lobbying activities.

8.2 It will be deleted upon request, unless data is required to be retained by the CSA for monitoring future membership applications or otherwise by law.

8.3 We provide easy ways to stop all marketing and you can opt out at any time by contacting us directly (see details at 1.4) or by selecting ‘unsubscribe’ in our e-mail correspondence.

9. Does the CSA make automated decisions about me or profile me?

9.1 The CSA does not make automated decisions.

9.2 We do segment member employees based on role/job title but we do not carry out profiling.

10. What can I do if I want to see the personal data held about me?

10.1 Where we process your personal data you have several rights. These rights are qualified by law, which means that they may not apply in all circumstances and there may be some exemptions.

10.2 You have a right of access to the personal data we process. If you wish to exercise this right and see the personal data that the CSA holds, you can make this request by contacting us by e-mail, in writing or on the telephone. Our contact details are noted above in section 1.4.

- 10.3 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.
- 10.4 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 the circumstances. We may 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.
- 10.5 If you want to exercise one of these rights, please contact us on the details noted in 1.4 so that we can act on your request or explain why we will be continuing to process the data we hold.

11. Who can I complain to if I'm unhappy about the use of my personal data?

- 11.1 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. Our contact details are in section 1.4 above.
- 11.2 Data protection is regulated in the UK by the Information Commissioner's Office. If you want to know more about data protection, or if you want to complain about our processing of personal data, you can contact them at the details below:
- Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
- 0303 123 1113
- 11.3 You can also report concerns about companies' use of your personal data to the Information Commissioner's Office here: <https://ico.org.uk/concerns/>

12. Changes to this notice

- 12.1 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.
- 12.2 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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Sir Bobby Robson Way
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NE13 9BA

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