

- 1. Introduction.** Data protection and privacy are of highest importance to the Centre for Community Finance Europe Ltd (“CFCFE”). CFCFE Personnel shall at all times maintain in strictest confidence and not disclose outside CFCFE any Personal Data and/or Confidential Information that comes into their possession in the course of their employment or other activities with CFCFE. This basic principle shall be understood and applied as broadly as possible and shall have no exceptions whatsoever except as specifically stated in this policy.
- 2. Definitions.**

  - 2.1. "CFCFE" means the Centre for Community Finance Europe Ltd and any other CFCFE owned or affiliated entity.
  - 2.2. "Data Protection Laws" means the Irish Data Protection Act 1998 – 2003 and the General Data Protection Regulation (GDPR).
  - 2.3. "Personal Data" means the Personal Data of any individual whether in paper, electronic or any other form as defined in the Data Protection Laws.
  - 2.4. "CFCFE Personnel" means all CFCFE directors, officers and employees and all contract researchers, writers and other outside contractors who collect, control or process Personal Data and/or Confidential Information in connection with their services to CFCFE.
  - 2.5. "Research Subject" means an individual whose Personal Data is collected in the course of an interview, survey or other research conducted by CFCFE Personnel.
  - 2.6. "Non-Public" means information that has not been published or otherwise made available to the public by the owner of that information or by operation of law, and it includes information that has been made public or otherwise disclosed in violation of a duty of confidentiality to the owner of such information.
  - 2.7. "Confidential Information" means any Non-Public information of any kind related to or belonging to CFCFE and for purposes of this Policy and notwithstanding 2.6, Personal Data shall in all cases be deemed to be Non-Public.
- 3. General Principles.** CFCFE is a Data Controller under the Data Protection Laws and all Personal Data will be maintained in accordance with the obligations of that law and regulations adopted thereunder. Data Protection safeguards the privacy rights of individuals in relation to a Data Controller's possession of their Personal Data, whether held in paper or electronic format. The Data Protection Laws prescribe strict rules about the way in which Personal Data are collected, accessed, and used. The Data Protection Laws also permit individuals to access their Personal Data on request, and confer on individuals the rights to have their Personal Data amended if found to be incorrect, and to have their data erased. The purpose of this policy is to help ensure that we comply with the Data Protection Laws.

## 4. Data Protection Policy

4.1. This Data Protection and Confidentiality Policy has been adopted by the CFCFE Board of Directors as a statement of CFCFE's commitment to protect the rights and privacy of individuals as required by Data Protection Laws. Specific procedures for doing so may be approved by the CFCFE Board of Directors from time to time to implement this policy.

4.2. All CFCFE Personnel who collect, control, use or process Personal Data are individually responsible for compliance with the Data Protection Laws. CFCFE considers that given the nature of its activities, a Data Protection Officer is not required; the Directors co-ordinate the provision of support, assistance, advice, and training within CFCFE to ensure that CFCFE complies with the Data Protection Laws.

4.3. CFCFE conducts an annual internal data audit to ensure it maintains a comprehensive picture of what data CFCFE has collected, how it is stored, how it is managed and, where appropriate, erased.

4.5. Personal Data shall be used by CFCFE Personnel exclusively for CFCFE's legitimate research, administrative and other business purposes and shall not be disclosed outside CFCFE except for such purposes and then only to such contractors, advisors, data processors and other persons having the same legal obligation of data protection and confidentiality that apply to CFCFE Personnel by the Data Protection Laws and this policy, except only as otherwise permitted by this policy.

4.6 The Personal Data of Research Subjects shall, to the extent practical and consistent with sound research standards, be gathered by CFCFE Personnel on an anonymous basis such that it cannot be identified to any particular individuals. The only exceptions will be:

4.6.2 transcripts, recordings, notes and other records of interviews or conversations with Research Subjects, or

4.6.2 materials submitted to CFCFE by Research Subjects containing personal information that documents the Research Subject's identify and capacity, or

4.6.3 any other materials which, in the judgment of a CFCFE Director, need to retain information regarding a Research Subject's identify and capacity to permit subsequent verification and validation of research results.

4.7 CFCFE gathers Personal Data of Research Subjects solely for purposes of providing research results, aggregate information and anonymised quotes and examples for analysis, consultation, advice, training and reports to and for CFCFE members and clients. The results of such research and analysis, but NOT the underlying Personal Data, will be provided to members and clients, and in some cases to the general public, in the form of reports and research papers. To the extent that any example of Personal Data is included in such research and results it shall always be presented in a completely anonymised manner so that the individual to whom it relates cannot possibly be identified from such example. The only exceptions to the previous sentence are interview quotations, comments, etc. that include other information (e.g. name, job title, etc.) which the Research Subject expressly consents to being published by CFCFE.

4.8. An assessment of qualifying Personal Data will be undertaken at the commencement

of each project. CFCFE will require the providers of such Personal Data to confirm that all necessary consents are in place to permit sharing such Personal Data with CFCFE and CFCFE's use thereof in compliance with this policy.

4.9. CFCFE Personnel shall perform our responsibilities under the Data Protection Laws in accordance with the following principles:

4.9.1. We shall obtain and use Personal Data fairly and in accordance with our statutory and other legal obligations as well as our contracts and other agreements with clients and other data providers.

4.9.2. We shall retain Personal Data only for the purposes of providing our members and clients with research and analysis, training, consultation and advice.

4.9.3. We shall use Personal Data only in circumstances that are necessary for our services, and we shall not disclose Personal Data to anyone except (a) the client or other data provider from or on behalf of whom we received that particular Personal Data or (b) as otherwise permitted by this policy.

4.9.4. We shall take appropriate security measures to protect against unauthorised access to, or alteration, disclosure or destruction of Personal Data and against its accidental loss or destruction. We will communicate with data controllers who have provided such data as required.

4.9.5. CFCFE shall only hold Personal Data to the extent that it is adequate, relevant and not excessive.

4.9.6. In the event we receive a request from a Individual that we provide, erase or correct their Personal Data, we shall do so promptly in accordance their rights under the Data Protection legislation.

**5. Data Retention Policy.** CFCFE will retain Personal Data only for such time periods as are specified below at which point all copies will be securely and permanently erased:

Personal Data of Research Subjects that is <u>not</u> maintained by CFCFE in anonymised form <u>and</u> that has not been published as permitted by the last sentence in 4.7	60 months after the date it is released as part of the underlying basis for reports to clients or published in research papers or otherwise by CFCFE, i.e. kept for purposes of future research verification and validation
Anonymised or aggregate data from Research Subjects or published per 4.7	May be maintained indefinitely
Personal Data of CFCFE Personnel	120 months after their final termination as CFCFE Personnel
Personal Data of individuals associated with clients, members or other providers held for communications with them in relation to CFCFE's activities	60 months after termination of the relevant relationship with CFCFE or earlier upon CFCFE learning the individual is no longer associated with a client / member / provider

For avoidance of doubt, the foregoing data retention policy does not apply to Personal Data that has been published by CFCFE in accordance with this policy and the Data Protection Laws.

**6. Confidentiality Policy.** This policy is a statement of CFCFE's commitment to maintain in strictest confidence its own and all client / member Confidential Information and to not disclose it except as specifically permitted by this policy.

6.1. CFCFE Personnel shall at all times maintain utmost secrecy in regard to the affairs of CFCFE and shall keep confidential any information, documents, data files etc., relating to CFCFE, its members, clients and Research Subjects that may come to their knowledge in the course of their work for CFCFE.

6.2. Personnel shall not disclose Confidential Information except to other CFCFE Personnel who have a need to know and who have permission from CFCFE to receive it.

6.3. CFCFE Personnel shall take special care in public places (e.g. restaurants, airplanes, lifts) to ensure that even casual conversation or inadvertent displays of written material do not lead to the disclosure of any Confidential Information.

6.4. After termination of employment or other engagement with CFCFE, CFCFE Personnel shall immediately return all Confidential Information to CFCFE.

6.5. Before commencing any work for CFCFE that may involve access to Confidential Information, CFCFE Personnel shall sign an employment or other nondisclosure agreement that obligates them to comply with the requirements of this policy as a condition of their employment or other relationship with CFCFE.

**7. Inquiries** about this Data Protection and Confidentiality Policy should be made to: Director of Development, Centre for Community Finance Ltd., 311 Brantingham Road, Manchester M21 0GU.