



## Brentwood Chamber of Commerce

*Building Better Business for Brentwood*

### Privacy Policy

Brentwood Chamber of Commerce is dedicated to respecting, safeguarding and preserving your privacy when visiting our website or communicating with us.

This Privacy Notice explains what happens to any personal data that you provide to us, or that we collect from you by whatever means and informs you as to how we look after your personal data whenever you are in contact with us and tells you about your privacy rights and how the law protects you.

We do update this Policy from time to time so please do return and review this Policy regularly. For the purpose of the General Data Protection Rules (GDPR)".

The Privacy Notice is on the website and you can download a pdf version. If you have any issues in obtaining a copy of the information contained in the Policy, please contact the Chamber Office; details are given below.

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#### 1. IMPORTANT INFORMATION

The Purpose of this Privacy Notice is to give you information on how Brentwood Chamber of Commerce collects and processes your personal data in various forms, including any data you may provide through the Chamber website.

It is important that you read this Privacy Notice together with any other notices we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

This Privacy Notice supplements the other notices and is not intended to override them.

We only collect data relating to individuals over 18 years of age.

#### 2. WHO WE ARE

##### *a. Data Controller*

Brentwood Chamber of Commerce (collectively referred to as "we", "us" or "our" in this Privacy Notice) is the Data Controller and is responsible for your personal data.

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the Chamber office the details set out below.

#### **b. Contact details**

Our full details are:

Name: Brentwood Chamber of Commerce  
Office address: Pepperell House, 44 High Street, Brentwood, Essex, CM14 4AL  
Telephone number: 01277 214814  
Data Controller: Specifically, Chairman of the Brentwood Chamber from time to time in post:  
As at May 2018, Colin Barber.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### **3. THE DATA WE COLLECT ABOUT YOU**

We may collect, use and store and transfer different kinds of personal data about you which is primarily used to enable us to provide our services to you and which we have grouped together follows:

- **Personal data**, or personal information, means any information about an individual from which that person can be identified.
- **Identity Data** includes name, address, title, information provided by you about your business, including SIC number and on occasions individuals and their details within your business
- **Contact Data** includes billing address, email address, telephone numbers including mobile
- Financial Data includes invoices and payment details. No financial information is shown on the website
- **Profile Data** includes any preferences, feedback and survey responses we may hold about you
- **Usage Data** includes information about how you use our website, e-mail and other services
- **Aggregated Data** for any statistical or demographic data purpose. This may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users opening or responding to e-mails. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any Special Categories of Personal Data about you. This includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time

### **4. HOW IS YOUR PERSONAL DATA COLLECTED**

We use different methods to collect data from and about you including through:

- a. **Direct interactions.** You may give us your Identity and Contact Data by filling in forms or by corresponding with us by post, phone, e-mail, and the website or otherwise. This includes personal data you provide when you
  - apply for our membership or services
  - subscribe to our membership or publications
  - request marketing to be sent to you

- enter a competition, promotion or survey
- give us some feedback
- b. **Indirect interactions.** We may receive personal data about you from various third parties, namely
  - Other Chambers of Commerce
  - Event organisers which have a link to Brentwood Chamber of Commerce
  - Other members of the Brentwood Chamber of Commerce

## 5. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. The information that we collect and store relating to you is primarily used in the following circumstances:

- where we need to perform the contract we are about to enter into or have entered into with you or to provide you with information requested from us
- where we provide information on other products which we feel may be of interest to you.
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interest
- where we need to comply with a legal or regulatory obligation.
- To meet our contractual commitments to you.
- Where we need to notify you about any changes or improvements to our service or product, which may affect our service.

Specifically:

- If you are an **existing customer**, we may contact you with information about goods and services similar to those which were the subject of a previous sale to you.
- If you are a **new customer**, we will only contact you or allow third parties to contact you only when you have provided consent and only by those means you provided consent for.
- If **you do not want us to use your data** for our own or third parties' use you will have the opportunity to withhold your consent to this when you provide your details to us on the form on which we collect your data.

We do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Please be advised that we do not reveal information about identifiable individuals to our advertisers but we may, on occasion, provide them with aggregate statistical information about our visitors.

## 6. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data:

- a. with the **external parties** set out below for the purposes set out in paragraph 5 above, namely:
  - Other Chambers of Commerce
  - Professional advisers, for example solicitors, accountants
  - Service suppliers, representatives and agents that we may use to make us more efficient, for example marketing agencies, typing services etc.

We do not allow third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.
- b. with the **other members of Brentwood Chamber of Commerce** for the purposes set out below, namely:
  - at networking events to provide a list of potential attendees
  - on the website, as part of the Members' Directory

We do not rely on consent as a legal basis for disclosure of your personal data on those occasions noted in paras. a. and b. above. You have the right to withdraw consent to such disclosure at any time simply by contacting us.

- c. Where we are **legally required to disclose** your information due to a request from legal agencies, for example to assist fraud prevention

We require all third parties to respect the security of your personal data and to treat it in accordance with the law.

## 7. DATA SECURITY

We are committed to protecting the data we hold about you and ensuring it is secure, private and confidential. We have put in place robust, physical, and managerial controls to protect the confidentiality, integrity and availability of information we hold about you and to prevent it from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know; they will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

We do not transfer your personal data outside the European Economic Area (EEA)

## 8. DATA RETENTION

- a. How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. In some circumstances you can ask us to delete your data: see Request erasure below for further information. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you

## 9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data, known as YOUR LEGAL RIGHTS. You have the right to:

- a. **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- b. **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- c. **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- d. **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- e. **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
- if you want us to establish the data's accuracy
  - where our use of the data is unlawful but you do not want us to erase it;
  - where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims;
  - you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- f. **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- g. **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

## 10. END

Neil Hornsby  
Member Services  
10 December 2019