# **Privacy Policy & Terms and Conditions**

Welcome to the Dorset Chamber of Commerce and Industry's privacy notice. Dorset Chamber respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from), interact with us or use our services, and tell you about your privacy rights and how the law protects you.

Employees should note that details about how their personal data is processed are covered in a separate employee privacy policy.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a pdf version of the policy here. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

- IMPORTANT INFORMATION AND WHO WE ARE
- THE DATA WE COLLECT ABOUT YOU
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- DISCLOSURES OF YOUR PERSONAL DATA
- INTERNATIONAL TRANSFERS
- DATA SECURITY
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- YOUR LEGAL RIGHTS
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## 1. Important information and who we are

## Purpose of this privacy notice

This privacy notice aims to give you information on how Dorset Chamber collects and processes your personal data through your use of this website, and any data you may provide through this website (e.g. when you sign up to our newsletter, or sign up to become a member, etc.) or when you purchase a product or service, take part in a competition or survey, or interact with us.

Our services are not intended for children and we do not knowingly collect data relating to children. It is important that you read this privacy notice together with any other privacy notice or fair processing notice 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.

#### Controller

Dorset Chamber is the controller and responsible for your personal data (collectively referred to as "Dorset Chamber", "we", "us" or "our" in this privacy notice).

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

#### **Contact details**

Our full details are:

Full name of legal entity: Dorset Chamber of Commerce and Industry

Name or title of DPO: Sue Bhatt

Email address: sue.bhatt@dorsetchamber.co.uk

Postal address: Acorn Office Park, Ling Road, Tower Park, Poole, Dorset. BH12

4NZ Telephone number: 01202 714800

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). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

# Changes to the privacy notice and your duty to inform us of changes

We may change or update elements of this privacy notice from time to time or as required by law. The most current version of our privacy notice is available on our website at https://dorsetchamber.co.uk/about-us/terms-privacy/

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

# **Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit, to understand how they may process your personal data.

## 2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- Financial Data includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.
- **Profile Data** includes your username, purchases or orders made by you, your interests, preferences, events attended, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data 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 accessing a specific website feature. 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.

Unless stated elsewhere, 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 product or service you have with us but we will notify you if this is the case at the time.

# 3. How is your personal data collected?

We will collect your personal data from and about you, in varying ways, including through:

- **Direct interactions**. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
- apply to be a member, or for our products or services;
- create an account on our website;
- subscribe to our service or publications;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us some feedback.
- attend events and seminars
- Automated technologies or interactions. As you interact with our website,
  we may automatically collect Technical Data about your equipment, browsing
  actions and patterns. We collect this personal data by using cookies, server
  logs and other similar technologies. We may also receive Technical Data
  about you if you visit other websites employing our cookies. Please see our
  cookie policy for further details: https://dorsetchamber.co.uk/about-us/cookiepolicy/.
- Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:
- Technical Data from search information providers, or providers we use to advertise our services.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
- Identity and Contact Data from data brokers or aggregators
- Identity and Contact Data from publicly available sources, where required.

## 4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you (e.g. if you become a member).
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Customer administration, account management and the running of our business and services (e.g. events, accounting, etc.)

# 5. Purposes for which we will use your personal data

We have set out in this section, details of the different circumstances by which we process your data, and why it is lawful for us to do so. We have also identified what

our legitimate interests are where appropriate. References to the types of data we collect and process reflect those set out in section 2 above.

#### Visitors to our website

Where we collect personal data via our website, we will be upfront about it, and it will be obvious to you that you're providing personal data and how we will be using it.

If you simply visit our website, we may use data analytics and other technical and usage information to understand how visitors use our website, to keep our website updated and relevant and to inform our marketing strategies. We may also, where required, use this information to protect our website or services from attacks, fraudulent behaviour and other cyber security risks.

#### Cookies

We may use cookies on our website for various reasons. You can find out more information about the cookies we use, please see www.dorsetchamber.co.uk/about-us/cookie-policy/

# New and existing members

If you register as a new member, we will process identity, contact, financial, transaction and communications information, for the purposes of setting up your membership.

We may also use this information for the purposes of communicating details about your membership and the general running of our services (e.g. our legitimate interest to recover debts due to us, to notify you of changes in our membership terms, etc.).

# If you contact us

Depending on the nature of your contact, we may record your identity and contact information if you contact us.

If you contact us by email, we will store your email and its contents within our email service. Your email will also be downloaded by the relevant member of staff and stored on their device in their email program.

These details may also be recorded against your membership information in our members management system, if relevant, and you're a member.

If you contact us via telephone, we may take notes of our conversation and store these within our members management system.

## If you partake in a prize draw or competition

We will process your identity, contact, profile, usage and communications data to enable us to run the prize draw or competition when you enter. Any competition

specific information you provide will be used for the sole purpose of running the prize draw or competition, unless you have consented otherwise.

# If you partake in a survey

From time to time we may ask our members and other contacts to participate in a survey about the Chamber and our services. Completion of such surveys will generally be optional, and in most cases the data collected will be anonymised, but where the information provided is considered your personal data we will only process it for the purposes of analysis survey results, getting in touch with you based on your comments in the survey, or if you consent to us using the information for other purposes (e.g. to publish your comments publicly, such as reviews and testimonials).

# Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

## Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing and it is lawful for us to send you the information.

# Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside the Dorset Chamber for marketing purposes.

#### Our use of social media

As well as posting updates and information about the Chamber to our social media channels, in some circumstances we may contact you directly via these social media channels if it is appropriate and lawful for us to do so. For example, we may collect contact information from your LinkedIn profile for the purposes of asking you to consider becoming a member.

You can ask us or third parties to stop sending you marketing messages at any time by contacting us, or if you're a member, logging into the website and checking or

unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting us at any time.

# If you apply to work at Dorset Chamber

If you apply for a position to work or volunteer at the Chamber, we will collect the minimal amount of identity and contact information, as well as role specific information (e.g. your CV) for the purposes of assessing you as a candidate for the role

If you go on to become an employee this information will be added to your employee file and processed in accordance with our employee privacy policy.

If you are unsuccessful, we may seek your consent to keep your information for up to a year for the purposes of considering you for future positions. Otherwise, we will delete your information after 3 months, unless it is lawful for us to retain it longer.

# If you are a supplier or contractor

If you are one of our suppliers or contractors, we will collect the minimal information about you and your services as required to make use of your services and deal with invoices and payments for your services. Such information will be stored within our accounting package for the purposes of our accounts and will be retained accordingly.

Individual employees within our business may also retain your contact details within their email application or via business cards that you may provide to us.

# **Special projects**

In some circumstances we may carry out special projects, either of our own or of our partners (e.g. the local authorities, BCC, etc.) In such circumstances we may provide you with an addendum to this privacy policy which sets out any specific data processing activities which occur, as required by the project. Otherwise, your data will be processed in accordance with this privacy policy.

# Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 6. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Third party service providers whom we use for the purposes of effectively running our business and providing our services. This may include online services as well as third-party companies such as accountants, HR support, etc.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. As such we will always carry out due diligence and ensure there is a legally binding contract (sometimes called a Data Processing Agreement or DPA) in place.

We do not allow our 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. Furthermore, in all cases where we are using a third-party service or company, we will only provide the minimal amount of information for the purposes of delivering the service to us and to meet our requirements.

#### The British Chambers of Commerce.

The Chamber is also part of a network of 53 Chambers of Commerce across the UK accredited by the British Chambers of Commerce (BCC). One purpose of the Chamber is to "influence the function of …any governmental body". We will provide BCC with your company's email address in order for BCC to conduct research into the impact of policies on your business.

# What does the BCC do with your data?

BCC will not contact your business for any other purpose other than to notify you of an opportunity to respond to a national policy survey. Each year, BCC conducts around five surveys which directly help us develop and shape Government policy across a range of areas, including business taxation, international trade, and employment. The data from these surveys are completely anonymised and aggregated so that individual responses cannot be identified. The anonymised data are then presented in closed briefings with stakeholders across UK Government, and shared publicly through BCC's press team. The purpose of carrying out the surveys is to produce reports, which BCC and the Chambers can then use in their activities in promoting and protecting the interests of UK businesses; in other words, they are part and parcel of the function and purpose of BCC and the Chamber.

There is never any marketing or commercial purpose to the surveys, and BCC does not carry out surveys on behalf of any third party.

You can contact us if you do not wish to be contacted by BCC, and you will have the opportunity to unsubscribe from BCC's research mailing list at any point

#### 7. International transfers

Except where we may use a non-UK external third-party to provide services to us, we do not transfer your personal data outside the UK, unless there are appropriate safeguards in place to protect your information.

# 8. Data security

We have put in place appropriate security measures to prevent your personal data 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.

#### 9. Data retention

## 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.

By law we have to keep basic information about our members (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for HMRC purposes.

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.

# 10. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us.

More information about these rights can be found in the Glossary below.

# No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

## What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 11. Glossary

#### **LAWFUL BASIS**

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on

you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

#### **THIRD PARTIES**

#### **External Third Parties**

- Service providers acting as processors who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

#### YOUR LEGAL RIGHTS

You have the right to:

**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.

**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.

**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.

**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.

**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: (a) if you want us to establish the datas accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**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.

**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.