



MEETINGS & EVENTS

## **CHAMBER SPACE PRIVACY POLICY**

### **OUR PRIVACY POLICY**

Greater Manchester Chamber of Commerce (“the Chamber”) honours the rights of its clients, members, employees and other users’ including website visitors’ right to privacy and data protection. The Chamber is fully committed to complying with the provisions of all applicable Data Protection legislation and regulations such as Data Protection Act and EU GDPR. The Chamber honours the rights of its members, employees and other users to privacy and data protection. This Privacy Policy (“Policy”) describes how the Chamber collects, uses, shares, and retains personally identifiable information provided by users of this website. The Policy is effective as of 1<sup>st</sup> May 2018. The policy will be continuously assessed against new technologies, business practices, regulatory changes and the evolving needs of the Chamber and the memberships services provided the Chamber. We are registered with the Information Commissioners Office, the UK's Data Protection Authority.

### **Data Controller**

The data controller for all personal data collected via this website is Greater Manchester Chamber of Commerce with its registered office at Elliot House, 151 Deansgate, Manchester M3 3WD. This means that we are responsible for deciding what data we collect and how we hold and use your personal data. We will implement appropriate data security measures for protecting the data from unauthorised access and loss, as laid out in the Security section of this Policy.

### **Data Collection**

The Chamber collects and maintains a variety of personally identifiable information, including names, email addresses, phone numbers, payment information, social media profiles, business addresses, demographic information such as the local authority area or industry sector of the business and details of Chamber services the users may be interested in such as international trade opportunities, events and training courses. The Chamber collects information directly from individuals or from the parent companies of the individuals. The

information could be collected through e-mails, phone calls, online registration forms, event registration forms and face to face meetings. The Chamber does not collect personal data about individuals except when there is a legitimate business requirement or when such information is provided on a voluntary basis.

Users should also be aware that non-personal information and data may be automatically collected through the standard operation of the Chamber's web servers, and by the use of cookies technology and/or Internet Protocol ("IP") address tracking. Non-personal identification information might include the browser used by you, the type of computer, the operating systems, the Internet service providers, and other similar information. The Chamber's web server also automatically gathers information about the top viewed and visited pages and links on our website, top entry and exit points, number of form completions, time spent on pages, top downloads, top keywords used offsite to lead customers to our website, your internet protocol (IP) address, information collected via cookies, the areas you visit on the website, the links you may select from within the website to other external websites and device event information such as system activity, crashes, hardware settings, browser type etc. Most browsers are set to accept cookies. You can set your browser to refuse cookies, or to alert you when cookies are being sent; however, if you disable cookies, the full functionality of the Chamber's websites may not be available to you. The information thus collected enables us to develop and customise our services better to meet your needs and preferences, and to bring to your attention member services, events, networking opportunities and training courses.

### **Purpose of Processing**

The personal data collected is used by the Chamber to give you information relation to Chamber membership, the Chamber's website, other Chamber services, customer administration, prospecting new members, account management with existing members, to process and respond to queries received from the public or other relevant stakeholders, to contact you to seek your views or comments on emerging political or economic issues and to send marketing communications on the Chamber's behalf or on behalf of the Chamber's patrons and strategic partners. The Chamber may perform statistical analyses of user behaviour and characteristics to measure interest in and the use of various sections of the website. The personal data held by the Chamber may also be used on an aggregate basis without any personal identifiers to provide third parties with information, such as the composition of membership, and to help us develop new member services and products, improve the features and content of the website or other marketing material, and to provide sponsors and others with aggregate information about our members, website users and their usage patterns in relation to services and/or the website.

If you or your parent company are a current member of Greater Manchester Chamber of Commerce, opting out of promotional emails will not stop all communication from us. By becoming a member of the Chamber, your firm is signing you up to receive certain information related to the organisation. It is a constitutional requirement for us to send this information to you.

If you are not a member of the Chamber or if your or your parent company's membership has lapsed, you can choose to opt in or out of further contact with us. We also receive non-member data through networking (e.g. business cards, event registrations) and add these details, if relevant, onto our CRM or other data management system. We may on occasion purchase 'opt-in' data (lists from reputable providers) for promotional campaigns.

### **Data retention**

The personal data collected is stored in the Chamber's CRM system and other appropriate data management systems, both paper based and electronic. Personally identifiable information will not be disclosed to any third party except if permission has first been obtained from the users. The data will not be transferred to any agency located outside the EU. At regular intervals, we will:

- *review the length of time we keep your personal data for*
- *consider the purpose or purposes for which we hold your personal data for in deciding whether (and for how long) to retain it*
- *securely delete information that is no longer needed for that purpose or those purposes*
- *update, archive or securely delete information if it goes out of date.*

### **Security**

The Chamber uses reasonable measures to safeguard personally identifiable information. The implemented measures will be appropriate to the type of information maintained and compliance with all relevant legislation governing protection of personal information. Measures are implemented to preserve the confidentiality, integrity and availability of the personal information. 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 only those employees, contractors or agents who have a legitimate business need to have access to that data. The employees, contractors or agents will process your personal data in accordance with our instructions. They will be subject to a duty of confidentiality and due care with respect to handling the personal data. We have put in place procedures to deal with any suspected data security breach and will notify you

and any applicable regulator of a suspected breach where we are legally required to do so. The Chamber's employees are trained on data security and information protection. Relevant areas of the Chamber's website will employ Secure Socket Layer ("SSL") or Transport Layer Security ("TLS") encryption technology to enhance data privacy and help prevent loss, misuse, or alteration of the information collected and retained by the Chamber.

### **Links to Third-Party Sites**

Where appropriate and only for the legitimate business needs of the Chamber and its members, the Chamber may provide links to third-party web sites, or advertisements which contain links to third-party sites. These links are provided as a service to website users. The linked third-party websites are operated by independent entities that have their own privacy policies. This Privacy Policy does not apply to such other websites or to the use that those entities make of your information. The Chamber has no control over the content displayed on such sites, nor over the measures, if any, that are taken by such sites to protect the privacy of your information. The Chamber's website may also serve third party advertisements, or other content that contains their own cookies or tracking technologies. The Chamber does not control the use of those technologies.

### **Opt-Out**

The Chamber is a membership organisation and for its legitimate business interests, must maintain contact information on its members and the wider business community to communicate information on membership, events, training courses, policy and research, international trade and any other Chamber products or services. The Chamber also sends promotional material promoting its events, training courses, membership services, business support services, policy and research work and other relevant offerings. From time to time, the Chamber collaborates with other relevant organisations and companies to promote other programs that may be of interest to members and the wider business community. In such cases, the Chamber does not provide these organisations with any personally identifiable information but may distribute the organisation's information on their behalf to those who may legitimately be benefited from receiving such information or have elected to receive such information. If you do not wish to receive marketing material, you may opt out. Every marketing e-mail will include an 'unsubscribe' link at the bottom. You may also notify the Chamber in writing as set out below. If your parent company has nominated you as a relevant contact required to receive information on its behalf, you cannot opt out of important information the Chamber is required to provide you as per the Chamber's contractual obligations to its members.

### **Social media**

We may use third party provided tools such as Hootsuite to manage our social media interactions. If you send us a private or direct message via social media the message may be stored by Hootsuite. Like other personal data, these direct messages will not be shared with any other organisations.

### **Access, Review and Correction**

The General Data Protection Regulations gives you the right to access your personal data held by us (“subject access request”). If you have an established business relationship with the Chamber, you may request from us a list of the categories of personal information held about you. Subject access requests must be made in writing to the details below. We will endeavour to respond to the request within a reasonable period and in any event within one month as required by the relevant provisions in the GDPR.

It is important that the personal data we hold about you is accurate and current. We will take all reasonable measures to ensure that the personal data we hold about you is accurate. We have also implemented procedures to enable you to review and correct your personal information, should there be any changes to your circumstances or errors in the gathered data. When you make a request to access or review the personal data we hold about you, we will request you to verify your identity before the request can be fulfilled.

### **Privacy Rights**

In addition to the rights of access, review and correction, you have the right to object to your personal data being processed for any particular purpose, or to request that we stop using your information. If you wish to exercise these rights, please e-mail [dataprotection@gmchamber.co.uk](mailto:dataprotection@gmchamber.co.uk) or send a letter marked "Data Protection" to the Chamber's offices at Elliot House, 151 Deansgate, Manchester M3 3WD. If you have further concerns about how we use your personal data, you also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the data protection authority for the UK. Please visit <https://ico.org.uk/> for more details on your data protection rights and how to contact them.

### **The British Chambers of Commerce**

The Chamber is 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”. This objective is stated in the Chamber’s ‘Articles of Association’. 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 conditions. 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.

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. If your or your parent company's membership of a local Chamber has lapsed, the BCC may continue to contact you about opportunities to respond to business surveys. You can choose to opt in or out of further contact with the BCC.