

Website Privacy policy

1. Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors Members.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of our website visitors and Chamber Members; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 This Web Site does not use "cookie" technology and We will not collect any personal information about you without your consent.
- 1.4 In this policy, "we", "us" and "our" refer to the West Cheshire & North Wales Chamber of Commerce. For more information about us, see Section 13.

2. Credit

- 2.1 This document was created using a template from SEQ Legal (<https://seqlegal.com>).

3. How we use your personal data

- 3.1 In this Section 3 we have set out:
 - (a) the general categories of personal data that we may process;
 - (b) in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
 - (c) the purposes for which we may process personal data; and
 - (d) the legal bases of the processing.
- 3.2 We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.
- 3.3 We may process Member account data ("**account data**"). The account data may include your name and email address. The source of the account data is you or your employer. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.

- 3.4 If you are a Member with us, we may process your information included in your personal profile on our website ("**profile data**"). The profile data may include your name, address, telephone number, email address, profile pictures, gender, date of birth, interests and hobbies, educational details and employment details. The profile data may be processed for the purposes of enabling and monitoring your use of our website and services. The legal basis for this processing is your consent when becoming a member.
- 3.5 We may process your personal data that are provided in the course of the use of our services ("**service data**"). The service data may include your name, address, telephone number, email address and dietary requirements. The source of the service data is you or your employer. The service data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is your consent by completing one of our website forms.
- 3.6 We may process information that you post for publication on our website or through our services ("**publication data**"). The publication data may be processed for the purposes of enabling such publication and administering our website and services. The legal basis for this processing is consent when posting events, news, special offers or facilities on our website.
- 3.7 We may process information contained in any enquiry you submit to us regarding goods and/or services ("**enquiry data**"). The enquiry data may be processed for the purposes of offering, marketing and selling relevant goods and/or services to you or to answer your specific enquiry. The legal basis for this processing is consent.
- 3.8 We may process information relating to transactions, including purchases of goods and services, that you enter into with us and/or through our website ("**transaction data**"). The transaction data may include your contact details, your card details and the transaction details. The transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely our interest in the proper administration of our website and business.
- 3.9 We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("**notification data**"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is consent.
- 3.10 We may process information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence

data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.

- 3.11 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 3.12 We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- 3.13 In addition to the specific purposes for which we may process your personal data set out in this Section 3, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.
- 3.14 Please do not supply any other person's personal data to us, unless we prompt you to do so.

4. Providing your personal data to others

- 4.1 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- 4.2 We may disclose your personal data to our suppliers or subcontractors identified at in the Membership benefits section of our website <https://wcnwchamber.org.uk/why-join-us/membership-benefits/> insofar as reasonably necessary to allow you to access the full benefits of being a Chamber member.
- 4.3 Financial transactions relating to our website and services are handled by our payment services provider Secure Trading. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. You can find information about the payment services providers' privacy policies and practices at <https://www.securetrading.com/>
- 4.4 We may disclose your enquiry data to other members or support organisations for the purpose of enabling them to contact you so that they can assist with your enquiry or offer, market and sell to you their relevant

goods and/or services. Each such third party will act as a data controller in relation to the enquiry data that we supply to it; and upon contacting you, each such third party will supply to you a copy of its own privacy policy, which will govern that third party's use of your personal data.

- 4.5 In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

5. International transfers of your personal data

- 5.1 In this Section 5, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA).
- 5.2 The hosting facilities for our website are situated in the United Kingdom. We may store your data in EU-US privacy shield certified data centres via our cloud providers. The European Commission has made an "adequacy decision" with respect to the data protection laws of each of these countries. Transfers to each of these countries will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission, a copy of which you can obtain from https://ec.europa.eu/info/law/law-topic/data-protection_en
- 5.3 You acknowledge that personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

6. Retaining and deleting personal data

- 6.1 This Section 6 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 6.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 6.3 We will retain your personal data as follows:
- (a) Usage data - will be retained based on the terms and conditions set by Google which you can view here <https://policies.google.com/terms?hl=en>.
 - (b) Account Data will be retained for duration of your Chamber membership starting on the date you joined the Chamber, and for a maximum period of two years if your Chamber membership stops.

- (c) Profile Data will be retained for duration of your Chamber membership starting on the date you joined the Chamber, and will be deleted if you Chamber membership stops.
- (d) Service Data will be will be retained for a minimum period of one week following the date of the enquiry, and for a maximum period of one year following the date of the enquiry.
- (e) Publication Data will be will be retained for a minimum period of one week following the date of the enquiry, and for a maximum period of one year following the date of the enquiry.
- (f) Enquiry Data will be will be retained for a minimum period of one week following the date of the enquiry, and for a maximum period of one year following the date of the enquiry.
- (g) Transaction Data (excluding card details which are not stored) will be retained for a minimum period of six years following the date of the transaction, and for a maximum period of seven years following the date of the transaction.
- (h) Notification Data will be retained until you unsubscribe from the relevant email notifications or newsletters.
- (i) Correspondence Data will be retained for a minimum period of one week following the date of the correspondence, and for a maximum period of one year.

6.4 Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

7. Amendments

7.1 We may update this policy from time to time by publishing a new version on our website.

7.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

8. Your rights

8.1 You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:

- (a) the payment of a fee (currently fixed at GBP 10); and
- (b) the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).

- 8.2 We may withhold personal information that you request to the extent permitted by law.
- 8.3 You may instruct us at any time not to process your personal information for marketing purposes.
- 8.4 In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

9. Cookies used by our service providers

- 9.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.
- 9.2 We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at:
<https://www.google.com/policies/privacy/>.

10. Our details

- 10.1 This website is owned and operated by the West Cheshire & North Wales Chamber of Commerce.
- 10.2 We are registered in England and Wales under registration number 173634, and our registered office is at University of Chester, Queen's Park Campus, Queens's Park Road, Chester, CH4 7AD
- 10.3 Our principal place of business is at West Cheshire & North Wales Chamber of Commerce, University of Chester, Queen's Park Campus, Queens's Park Road, Chester, CH4 7AD.
- 10.4 You can contact us:
 - (a) by post, to the postal address given above;
 - (b) using our website contact form;
 - (c) by telephone, on 01244 669988
 - (d) by email, using info@wcnwchamber.org.uk

11. Data Protection Manager – Debbie Bryce

- 11.1 Our data protection manager's contact details are: Debbie Bryce, Deputy Chief Executive Officer (d.bryce@wcnwchamber.org.uk).