

## Privacy Policy

### This is our privacy notice

Sussex Chamber of Commerce ("the Chamber") honours the rights of its members, employees and other users' including website visitors' right to privacy and data protection. We are committed to protecting your personal data. The Chamber is fully committed to complying with the provisions of all applicable Data Protection legislation and regulations such as Data Protection Act, UK GDPR 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 25th May 2018 and as updated from time to time, most recently in July 2024. 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 by the Chamber. We are registered with the Information Commissioners Office, the UK's Data Protection Authority.

### IMPORTANT INFORMATION AND WHO WE ARE

This privacy policy aims to give you information on how the Chamber collects and processes your personal data through your use of this website, including any data you may provide through this website, when you sign up to our newsletter, are a member of the Chamber, or otherwise provide information to us online, in-person or over the phone.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this Privacy Policy together with any other Privacy Policy or fair processing policy 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 policy supplements other notices and privacy policies and is not intended to override them.

### DATA CONTROLLER

The data controller for all personal data collected via this website is Sussex Enterprise Limited trading as Sussex Chamber of Commerce with its registered office at Unit 4 Victoria Business Centre, 43 Victoria Road, Burgess Hill, RH15 9LR. 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.

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

#### **DPM Contact Details:**

By Email: [info@sussexchamberofcommerce.co.uk](mailto:info@sussexchamberofcommerce.co.uk)

By Post: send a letter marked "Data Protection" to the Chamber's offices at Unit 4 Victoria Business Centre, 43 Victoria Road, Burgess Hill, RH15 9LR

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator 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.

## CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

We keep our privacy policy under regular review. This version was last updated in July 2024.

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 policy of every website you visit.

### 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 this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, 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 could be derived from your personal data but is not considered personal data in law as this data will **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 policy.

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.

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, exhibitions 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 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 website 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 in 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 members. The Chamber may perform statistical analysis 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 the Chamber, 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 you 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, exhibitions) 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.

## HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you 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, and email or otherwise. This includes personal data you provide when you:

- apply 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 feedback or contact us.

**Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our Cookie Policy for further details.

**Third parties or publicly available sources.** We will receive personal data about you from various third parties as set out below:

- Technical Data from the following parties:
  - a) analytics providers such as Google based outside the UK;
  - b) advertising networks within the UK; and
  - c) search information providers;
- Identity and Contact Data provided at events such as business cards or attendee lists.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.
- identity and Contact Data from data brokers or aggregators based inside the EU.

## 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.

- 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.

We rely on consent as one of the legal bases for processing your personal data where you have given it. In relation to sending third party direct marketing communications to you via email or text message we will only rely upon consent. You have the right to withdraw consent to marketing at any time by [contacting us](#) by email at [info@sussexchamberofcommerce.co.uk](mailto:info@sussexchamberofcommerce.co.uk).

## PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy and service announcements (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To engage with you on our website	(a) Identity (b) Contact	(a) Necessary for our legitimate interests in communicating with you and enabling us to provide comments and assist with anything raised in your comments
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation

To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you. This can be done by using a pixel or cookies which help to display relevant adverts on social media.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use our database and data analytics to improve our website, services, marketing, customer relationships and experiences	(a) Technical (b) Usage (c) Contact (d) Identity (e) Marketing and Communications	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about services and funding that may be of interest to you, such as in our direct marketing activities (including our email newsletter and social media marketing),	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	(a) Necessary for our legitimate interests (to develop our services and grow our business) (b) Consent

## 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 governmental bodies. This objective is stated in the Chamber's Articles of Association' (see section "Information Links" on the footer of our website [www.sussexchamberofcommerce.co.uk](http://www.sussexchamberofcommerce.co.uk)). 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 you or your parent company's membership of Sussex 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.

## 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, except where disclosed beforehand. At regular intervals, we will: review the length of

time we retain your personal data consider the purpose or purposes for which we retain your personal data when 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 programmes 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 their platforms. Like other personal data, these direct messages will not be shared with any other organisations.

## **INTERNATIONAL TRANSFERS**

We may transfer your personal data to service providers that carry out certain functions on our behalf. This may involve transferring personal data outside the UK to countries which have laws that do not provide the same level of data protection as the UK law.

Whenever we transfer your personal data out of the UK to service providers, we ensure a similar degree of protection is afforded to it by ensuring that the following safeguards are in place:

- We will only transfer your personal data to countries that have been deemed by the UK to provide an adequate level of protection for personal data; or
- We may use specific standard contractual terms approved for use in the UK which give the transferred personal data the same protection as it has in the UK, namely the International Data Transfer Agreement.

## **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 purpose.
- **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:
  - 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.
  - 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. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

If you wish to exercise these rights, please e-mail

[info@sussexchamberofcommerce.co.uk](mailto:info@sussexchamberofcommerce.co.uk) or send a letter marked "Data Protection" to the Chamber's offices at Unit 4 Victoria Business Centre, 43 Victoria Road, Burgess Hill, RH15 9LR. 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.

## THIRD PARTIES

### External Third Parties

- Survey development and distribution platforms, acting as a processor, such as Survey Monkey Inc. and SurveyMonkey Europe UC t/a SurveyMonkey, based in the US and within the EEA who provide online survey development services.
- Social media platforms, acting as processors and joint controllers, based within the EEA or US who host social media platforms.
- Platforms used to manage and market social media such as Hootsuite Inc.

- Marketing automation platforms, acting as a processor, such as The Rocket Science Group LLC t/a MailChimp based in the US who provide email marketing automation services.
- Service providers acting as processors based in the United Kingdom who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Website Hosting platforms who host the Chamber's website such as Host Lincoln Ltd, trading as Jolt, based within the United Kingdom.

**This Policy was last updated in July 2024.**