

1. VALUES

Thank you for trusting us with some information about you. We take that trust seriously and we want you to know how we use your information and why. If you have queries about how we use your data, or comments or questions about this Policy, please do email us at info@beckenhambusinessassociation.co.uk

Policy updates: We keep this Policy under regular review, and this page may be updated from time to time. Please come back here to check the latest version. This Policy was last updated on 25 May 2018.

2. WHO ARE WE?

We are the Beckenham Business Association ("BBA"), an unincorporated voluntary association of businesses based in or interested in Beckenham. We do not have any premises. The current Executive Committee members are listed [here](#). The current Chair, Jackie Groundsell, manages the website, emails members and organises events.

Contact details email: info@beckenhambusinessassociation.co.uk
telephone: 020 8650 8015

3. WORDS WITH SPECIFIC MEANINGS

In this Policy, there are words and phrases that have a specific meaning or that we are using in a special way. They are:

"personal data"	any information about an identifiable living human being.
"process"	we "process" your personal data when we do anything with it, which might include: collecting, recording, organising, storing, adapting, altering, retrieving, using, combining, disclosing, or deleting it.
"special category data"	means personal data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, sex life or sexual orientation, health, genetic or biometric data.

4. WHAT THIS POLICY DESCRIBES

This policy describes how we will collect and use personal data about you.

We process information about:

"Prospects"	potential members and non-member meeting attenders;
"Members"	current or past members of BBA;
"Suppliers", "Associates"	suppliers or potential suppliers of goods or services to us.

5. WHAT INFORMATION DO WE PROCESS, AND WHY?

a. Prospect

We do not conduct any email campaigns or other dedicated marketing activity to get new Members. Our new Members come mostly from referral by existing Members. We also keep our eyes open as we go around the borough, and will approach new businesses that we see opening, inviting them to come to a meeting. We may extend that invitation by email.

Data we are collecting about you, if we can, are name, contact details, how we came across you, and background information from you or published by you on social media or freely accessible on the internet, on why you might be interested in joining BBA.

If you sign up to our newsletter list, you will be sent what you asked for. We normally operate 'double opt-in' lists when you need to reconfirm your subscription before anything is sent. You can unsubscribe at any time by clicking the unsubscribe button on any email.

Our newsletter list is on Constant Contact. Their Privacy Policy is [here](#). Constant Contact Inc is a US company. They comply with the EU-U.S. and the Swiss-U.S. Privacy Shield Frameworks, providing for adequacy of data protection procedures for applicable English law.

If you book to attend a meeting, that happens on Eventbrite. Their privacy policy is [here](#). They also comply with the EU-U.S. Privacy Shield Framework.

If you attend meetings on the Association, we keep a record of that (in Eventbrite) and of your payment (in a system maintained by the Treasurer). If we email you individually using our own email system, or respond to an email sent to us at any of our business email addresses, a copy of that email will also be stored. We use Microsoft Outlook email, and their privacy policy is [here](#).

We do not routinely keep special category data. To the extent we might hold this, it was supplied or made publicly available by you.

We process your personal data to send you the newsletter by consent – and when you withdraw your consent (by unsubscribing) we stop sending it. Our other processing of your personal data is done on the basis of our legitimate interest in developing and administering the Association, and our assessment that the limited processing that we are doing will not be intrusive or objectionable.

b. Member

We keep details of current and past Members on Constant Contact (privacy policy [here](#)).

We collect and keep the same information as for 'Prospects' (see above), and record that you are a Member (as this gives you reduced rates for coming to meetings).

We process your data to support your membership of the Association. We do so on the basis that we have a legitimate interest in processing your data to manage and administer Association membership, and that this will not be intrusive or objectionable to you.

Financial and credit card details

We do not receive or store any financial or credit card details. Payments for events are typically made in cash, and payment for the annual conference and Membership is through PayPal. We do not hold any details of your PayPal account. PayPal's privacy policy is [here](#).

c. Supplier and Associates

We collect information on potential and actual suppliers and associates. We generally use Members to provide services to the Association. Most of the

information we hold is provided by you, but we do add to it the same kind of data we use for Prospects (see above).
If you become a supplier or associate we keep a copy of the contract between us and your bank details so we can pay you. We also keep a record of invoices/payments for accounting purposes.
We keep a record of the work you undertook for us, along with any comments, reviews or suggestions about that work including complaints (if any) and their resolution.
This information is all needed to manage our customer relationships and our supply chain.

6. SOCIAL MEDIA

We have an active presence on social media on [Facebook](#) and [Twitter](#). (Click the name of the platform for a link to their privacy policy.)
We can see the profile of people who like our Facebook page. We participate in Facebook conversations, and we can see what you tweet and what you have published about yourself in your Twitter profile.
Information you publish will be visible to us, depending on your privacy settings in the relevant platform. Your information is held by the platform and is subject to their data policy – we don't control those.

7. NEWSLETTERS AND AUTOMATED EMAILS

We may monitor who opens what in our newsletter lists, and pre-set sequences of information we send you. We do this so we can see if content is popular and generate more of it, or if it is not read.
There may be sub-routines that trigger if you click on links or articles. These are designed to offer you more information about things you are interested in.
You can unsubscribe from these sequences at any time.
From time to time, we contact individual email newsletter subscribers but this is rare. This would normally be if something odd were going on and we wanted to check you could see and use the content or find out what was causing a problem.

8. DATA SHARING – 3RD PARTIES

We do not sell or exchange your personal data with organisations who may want to sell you something or use your data for research or other purposes.

a. Platforms

As described above, we are processing data on Constant Contact, Eventbrite, and Outlook/Microsoft 365. These are all EU-US Privacy Shield compliant.

b. People

We are a micro-organisation. The Chair is the principal processor of personal data. Other Executive Committee members may have access to data when they need it to fulfil their function in the Association.
If we need to use external suppliers (for example, IT support), they may have some access to your data – which will be limited to what is necessary for them to provide their services to us.

9. WHERE IS YOUR DATA LOCATED?

Like most micro-organisations, we do not have any tailor-made software – we use mainstream packages for everything from our customer records, to email, to accounting. Some of your data may be held in the EEA, and some may be held in services in the USA (with suitable data privacy shields). We have picked mainstream suppliers with appropriate security standards.

10. RETENTION PERIODS

Your information will be kept during and after membership, and on the newsletter list until you unsubscribe. We retain our meeting attendance data indefinitely, on ICO advice that your attendance at meetings might be relevant in your defence of legal proceedings. Data on Eventbrite and Constant Contact is retained in accordance with their policies.

The Treasurer determines how long we need to keep financial information to satisfy the authorities

11. YOUR RIGHTS

You have the right to know what information we are collecting on you, and to amend it if it is inaccurate.

If you feel for some reason we have information we should not be keeping, or it is out of date or otherwise wrong, please let us know and we will take appropriate action.

Most of the information we hold is not based on your individual consent but is based on our needing the information to grow and run our Association.

If you want to know what information we have about you (if any) email us at the email address set out above and give us your name, email address(es) and we will happily do a search and let you know what information we hold on you and how we are using it/have used it.

You have a "right to be forgotten" - but that does have some legal limits to it. If you want us to remove information about you, let us know. If you have been a Member, we may not be able to remove all data as we will have to ensure that we can continue to comply with legal, accounting, and taxation requirements.

The generally applicable rights always apply: right to be informed, right of access, right to rectification, right to erasure, right to restriction and so on. For more information please see [Your rights in relation to your personal data](#).

12. COMPLAINTS

If you have a complaint about the way we are handling your information or how we have responded to a request for information or removal, you can take this up in the first instance by emailing us at the email address set out above.

If we can't sort it out, the relevant supervisory authority for us is the Information Commissioner for the UK. You can contact them [here](#).

13. COOKIES

If you visit our website, we use cookies and similar technologies to

- recognise your repeat visits and preferences
- analyse our website traffic

Our cookies do not identify you personally to us.

Commented [A1]: Jackie – I have taken a wild guess that this may be OK for your cookie policy. You need to check with your techies what cookies are on your website, and then we can refresh this if my guesses were not good.

If you click through a link on our website to a different website, then the cookie policy for that website will then apply to your session, and we have no control over those.

To learn more about cookies, including how to disable them, view <http://www.allaboutcookies.org/> or <https://www.aboutcookies.org/>.

By using our website, you agree to our use of cookies unless you have disabled them yourself. Please note that by deleting or disabling future cookies, your user experience may be affected and you might not be able to take advantage of certain functions of our site.