



## **Privacy Notice**

*"Being transparent and providing accessible information to individuals about how you will use their personal data is a key element of the Data Protection Act 1998 {DPA} and the EU General Data Protection Regulation {GDPR}. The most common way to provide this information is in a privacy notice." {Information Commissioner's Office Website}*

## **What is the purpose of this document?**

This privacy notice describes how we collect and use personal information about our customers, suppliers and other third parties, in accordance with the General Data Protection Regulations (GDPR). This Privacy Notice applies to all Personal Data we process regardless of the media on which that data is stored or whether it relates to past or present customers, clients or supplier contacts, website or any other Data.

## **Who should read this Privacy Notice**

This privacy notice relates to personal data which we hold in relation to the following types of data subject

- Individuals representing businesses who are registered under formal undertaking with Inverness Chamber International
- Individuals who have contacted Inverness Chamber International for export support, advice or consultancy
- Individuals working in those businesses who book for and attend international training events
- Individuals whom we believe wish to receive marketing or other communications from us
- Individuals working in businesses who are suppliers to Inverness Chamber International or its members

*"Data subject" refers to a natural person, not a business*

*"Personal Data" is any information related to a natural person or 'Data Subject', that can be used to directly or indirectly identify the person. For our purposes it will only ever refer to name, a photo, email address, bank details, posts on social networking websites, or a computer IP address.*

## **Collecting your personal data**

We will normally collect the personal data we need from you directly. If we acquire personal data about you from other sources, we will normally seek your approval or comment on it before acting on it. If your personal data changes, you should let us know. If you wish to know what personal data we hold about you, you can ask us (see below).

## **Processing your personal data**

The personal data which you give us will be used (or "processed") by us in order

- To progress your application for export documentation
- To provide export advice, support and consultancy to your business
- To meet our obligation to you as a business through the Local Export Partnership
- To contact you with details of ICI benefits and events in an effort to ensure you are aware of the opportunities available to you
- To promote your organisation in conjunction with Inverness Chamber International
- To make your experience of our services more convenient or comprehensive and
- To enable us to meet our obligations to you

There are legal basis for all the types of data processing which we carry out and these can be found at the end of this document.

This means that we may add your contact details to a mailing list or email group on your request. If you prefer to be removed from a mailing list or group, please let us know by contacting us. You can do so by emailing [membership@inverness-chamber.co.uk](mailto:membership@inverness-chamber.co.uk)

### **Sharing your personal data**

Confidentiality is very important to us. We will not, therefore, share any of your personal information with anyone [ unless ...]

- We need to do so in order to carry out the transaction or other piece of work that we have agreed to do for or with you;
- We are obliged to do so in order to comply with our legal obligations;
- We need to do so to protect your vital interests;
- We need to do so in order to carry out a task in exercise of official authority given to us by the Court, Parliament or Government;
- It is within our legitimate interests to share your data and doing so does not conflict with your fundamental rights and freedoms; or
- With your consent

### **Storage of your personal data**

We will gather your personal data manually and electronically and it will be stored in digital and hard copy formats while we are working for you and for a period after the work has ended.

We make use of cloud-based data storage and data processing systems. Some of the personal data you give us may be stored by us in this way. Personal data transmitted to or from our cloud – based storage system will be encrypted and will be subject to confidentiality agreements with the supplier of our data processing systems.

We will keep your data for no more than 1 year after your last interaction with us, (with regards to financial transactions we are obliged to hold details of the transaction for six years after the expiry of any financial year in which any contract we have arranged for you is discharged) after which point we will delete it from our systems and shred any physical copies. In some cases it will be necessary for us to retain your personal data for longer than ten years but this will always be with your agreement.

### **Destruction of your personal data**

Once your need to retain personal data has ended. We shall arrange to have your personal data securely destroyed. Hard copies will normally be shredded. Digital forms of personal data will be deleted from our cloud-based data storage facilities and from our own systems within our offices.

### **YOU / Data Subject Rights:**

Access (Art 15) (the data; purposes; recipients; duration; other rights (below) distinction between data you collect from the subject and data you acquire otherwise)

Rectification (Art 16) (inaccuracies; incomplete data)

Erasure (Art 17) (“right to be forgotten)

To object (Art 21) (only applies to Art 6 (e) “public interest” and (f) “legitimate interests” processing

Restrictions (Art 18) (limits use for specific reasons – e.g pending verification of accuracy)

Portability (Art 20) (if you process data “by automated means” data subject has right to receive data in “machine readable format “and for it to be sent to another controller)

Automated decisions (Art 22)

### **Lawful basis for processing data**

Each of the ways in which we process your personal data listed above falls into these lawful basis.

- Consent: the individual has given clear consent for you to process their personal data for a specific purpose. Consent requires a positive opt-in. Don’t use pre-ticked boxes or any other method of default consent. Explicit consent requires a very clear and specific statement of consent.
- Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.
- Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).
- Vital interests: the processing is necessary to protect someone’s life.

- Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.
- Legitimate interests: the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.