



## GENERAL PRIVACY NOTICE

### 1.0 Introduction

- 1.1 This privacy notice (the "Privacy Notice") applies to all personal information processing activities carried out by Staffordshire Chambers of Commerce Ltd (referred to as "we," "us" and "our").
- 1.2 Staffordshire Chambers of Commerce operates as both a data controller and data processor in respect of personal information that we process in connection with our business (including the products and services that we provide). In this notice, reference to "we," "us" or "our" are references to Staffordshire Chambers of Commerce. This Privacy Notice sits within a wider Chamber Data Handbook which is available upon request. All documents relating to data protection can be read independently or as a collection within this handbook.
- 1.3 Our principal address is Staffordshire Chambers of Commerce, Commerce House, Festival Park, Stoke-on-Trent, ST1 5BE and our contact details can be located at [www.staffordshirechambers.co.uk](http://www.staffordshirechambers.co.uk)
- 1.4 We are an accredited member of the British Chambers of Commerce (BCC). More information about the BCC can be found at [www.britishchambers.org.uk](http://www.britishchambers.org.uk)
- 1.5 We respect individuals' rights to privacy and to the protection of personal information. The purpose of this Privacy Notice is to explain how we collect and use personal information in connection with our business. "Personal information" means information about a living individual who can be identified from that information (either by itself or when it is combined with other information). We may update our Privacy Notice from time to time. When we do, we will communicate any changes to you and publish this updated Privacy notice on our website. We would encourage you to visit our website regularly to stay informed of the purposes for which we process your information and your rights to control how we process it.

## **2.0 Information we collect.**

2.1 We collect and process various categories of personal information at the start of, and for the duration of, your relationship with us. We will limit the collection and processing of information to information necessary to achieve one or more legitimate purposes as identifies in this notice. You provide some of this data directly, such as when you join the Chamber as a member or if you attend one of our events or training programmes as a member or non-member. Personal information may include:

- a) Basic personal information, including name and address, and contact details,
- b) Financial information including banking and payment information,
- c) Information about your business, including contact information.
- d) Goods and services provided,
- e) Online profile and social media information and activity, based on your interaction with us and our websites, use of our application,

2.2 We may also process certain special categories of information for specific and limited purposes, such as making our services accessible to customers. We will only process special categories of information where we have obtained your explicit consent or are otherwise lawfully permitted to do so. This may include information about:

- a) Racial or ethnic origin
- b) Gender
- c) Age

## **3.0 How we obtain personal information**

3.1 Your information is made up of all the financial and personal information we collect and hold about you/your business and the proprietors, officers, and beneficial owners of that business. It includes:

- a) Information you give to us,
- b) Information we may receive from third parties (where permitted by law),
- c) Information that we learn about you through our relationship with your and the way you engage with our services,
- d) Information we gather from publicly available sources, such as the press, the electoral register, company registers, and online search engines,

## 4.0 How we will use information about you

- 4.1 We access, transfer, disclose, and preserve your data to operate our business and provide our members and non-members with best products and services. We may use the data you provide to communicate with you. Most commonly, we will use your personal information in the following circumstances:
- a) To process and manage your membership/account,
  - b) To provide you with access to products and services e.g. training, forums, events
  - c) To provide membership benefits to you (these benefits may change from time to time, and a list of benefits will be available upon request or via the Chamber Website)
  - d) To process a donation that you have made to the Chambers' fundraising activities
  - e) To carry out obligations arising from any contracts entered by you and us
  - f) To seek your views or comments on the services we provide
  - g) To Notify you of changes to our services
  - h) To Comply with health and safety obligations
  - i) To Comply with applicable law or respond to valid legal process including from law enforcement or other government agencies
  - j) For our own business management and planning, including accounting and auditing
  - k) To Deal with legal disputes involving you, or other employees, workers, and contractors, including accidents
  - l) To prevent fraud e.g. to prevent spam or attempts to defraud,
  - m) To ensure network and information security, including preventing unauthorised access to our computer and electronic communication systems and preventing malicious software distribution
  - n) To conduct data analytics studies to review and better understand membership retention and attrition rates
- 4.2 In some cases, we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. From 5 February 2026, where our processing falls within a statutory category of recognised legitimate interests (for example, network and information security, fraud prevention, direct marketing, or necessary intra-group administration), we may rely on that basis without carrying out a separate balancing test, while continuing to respect your rights under UK data protection law.

## **5.0 Direct Marketing**

- 5.1 Unless you have told us that you do not want to hear from us, we will send you relevant marketing information (including details or other products or services provided by us or affiliated third parties which we believe may be of interest to you), by mail, phone, email, text and other forms of electronic communication. If you change your mind about how you would like us to contact you or you no longer wish to receive this information you can tell us at any time by contacting us at 01782 202222., via webchat or at our offices.

## **6.0 Communication about your membership**

- 6.1 We will contact you with information relevant to the operation and maintenance of your account (including updated information about how we process your personal information), by a variety of means including online webchat, email, text message, post and/or by telephone. If at any point in the future you change your contact details, you should tell us promptly about those changes.
- 6.2 We record and log calls, emails, text messages, and other communications in accordance with applicable laws for the purposes of our business.
- 6.3 We will actively seek consent for the processing of data relating to your membership during the application and member recruitment process. We will also actively seek consent on your communication preferences, which you can modify at any time. We do not need your consent if we use categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of law.
- 6.4 When you engage with the Chambers' products and services, we may approach you for your written consent to allow us to share your data with a third-party organisation or person. This is done to process members' and non-members' benefits and or services. If we do so, we will provide you with full details of the information that we would like, the reason we need it, and who it will be shared with so that you can carefully consider whether you wish to consent.

## **7.0 How we use sensitive personal information and do we need your consent?**

- 7.1 "Special categories" of sensitive personal information require higher levels of protection. We may process special categories of personal information in the following circumstances:
- a. In limited circumstances, with your explicit written consent,
  - b. Where we need to carry out our legal obligations and in line with our data protection policies,
  - c. Where it is needed in the public interest, such as for equal opportunities monitoring, and in line with our data protection policies,
  - d. Where it is needed to carry out obligations of a funded project,

## **8.0 Changed to the way we use your information.**

- 8.1 From time to time, we may change the way we use your information. Where we believe you may not reasonably expect such a change we will notify you and will allow a period of at least 30 days for you to raise any objections before the change is made. However, please note that in some cases, if you do not agree to such changes, it may not be possible for us to continue to operate your membership and/or provide certain products and services to you.

## **9.0 Automated decision-making**

- 9.1 Automated decision-making may take place when we believe an electronic system is best placed to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:
- a) Where we have notified you of the automated decision and have provided you with the opportunity to request human intervention, express your views or contest the decision, in line with the safeguards required under UK data protection law,
  - b) Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights,
  - c) In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights,
  - d) Where our automated decision-making involves non-sensitive personal data, we may also rely on a broader range of lawful bases under UK data protection law, including recognised legitimate interests, provided appropriate safeguards are in place. These safeguards include the right to obtain human intervention, to express your views and to contest the decision.

- 9.2 If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.
- 9.3 You will not be subject to a decision that has a legal or similarly significant impact on you based solely on automated processing unless we are permitted to do so under UK data protection law and we have informed you of the decision and your associated rights, including the right to obtain human intervention, to express your views and to contest the decision.
- 9.4 where our automated decision making involves non-sensitive personal data, we may also rely on a broader range of lawful bases under UK data protection law, including recognised legitimate interests, provided appropriate safeguards are in place. These safeguards include the right to obtain human intervention, to express your views and to contest the decision.

## **10.0 Data Sharing**

- 10.1 We may have to share your data with third parties, including third-party service providers to complete any transaction, or provide any product or service you have requested or authorised. We only permit them to process your personal data for specified purposes of us and in accordance with our instructions. We require third parties to respect the security of your data and to treat it in accordance with the law.
- 10.2 We may share your personal information where required by law, or where we have another legitimate interest in doing so. When you provide payment data to make a purchase, we will share payment data with banks and other entities that process payment transactions or provide other financial services, and for fraud prevention and credit risk reduction.
- 10.3 In addition, we share personal data among Chamber affiliates. We also share personal data with vendors or agents working on our behalf. For example, companies we've hired to provide customer service support or assist in protecting and securing our systems and services which may need access to personal data to provide those functions. In such cases, these companies must abide by our data privacy and security requirements and are not allowed to use personal data they receive from us, or they have access to for any other purpose than stated.

- 10.4 Please note that some of our products and services may include links to products and services of third parties whose privacy practices differ from ours. If you provide personal data to any of those third parties, your data is governed by their privacy statements. We are not responsible for any such third party's use of your information.

## **11.0 Transferring your information overseas**

- 11.1 Some services offered through the Chamber, such as Export Documentation or international services, may involve the transfer of your personal information outside the United Kingdom. These countries may not have the same data protection laws as the UK. In these circumstances, we will assess the transfer in line with UK data protection law, including the requirement that the level of protection in the destination is not materially lower than the standard in the UK.
- 11.2 Where we transfer your information outside the UK, we will take steps to ensure that appropriate safeguards and protections are in place so that your rights continue to be protected in accordance with this Privacy Notice and UK data protection legislation.

## **12.0 Data Security**

- 12.1 We are committed to ensuring that your information is secure with us and with the third parties who act on our behalf. We have put in place measures to protect the security of your information. Details of these measures are available upon request.

## **13.0 How long we keep your information.**

- 13.1 By providing you with products or services, we create records that contain your information such as customer account records, activity records, communication records. Records can be held on a variety of media (physical or electronic) and formats.
- 13.2 We manage our records to help us to serve our members well (for example for operational reasons such as dealing with any queries relating to your membership) and to comply with legal and regulatory requirements. Records help us to demonstrate that we are meeting our responsibilities and to keep as evidence of our business activities.
- 13.3 Retention periods for records are determined based on the type of the record, the nation of the activity, product, or service. We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal,

accounting, or reporting requirements. Details of retention are available upon request.

## 14.0 Your rights

- 14.1 We want to make sure you are aware of your rights in relation to the personal information we process about you. We have described those rights and the circumstances in which they apply in the table below.
- 14.2 If you wish to exercise any of these rights, if you have any queries about how we use your personal information that are not answered here, or if you wish to complain to our Data Protection Lead, please contact us at 01782 202222.
- 14.3 Please note that in some cases, if you do not agree to the way we process your information, it may not be possible for us to continue to operate your membership account and/or provide certain products and services to you. You also have a statutory right to raise a complaint directly with us if you believe we have processed your personal information in breach of data protection law, and we will acknowledge and respond to your complaint within a reasonable timeframe, in line with UK data protection legislation.

Rights	Description
<b>Access</b> – you have a right to get access to the personal information we hold about you.	If you would like a copy of the personal information we hold about you, please write to: Staffordshire Chambers of Commerce, Subject Access Requests, Commerce House, Festival Park, Stoke-on-Trent, ST1 5BE or contact us at 01782 202 222.
<b>Rectification</b> – You have a right to rectification of inaccurate personal information and to update incomplete personal Information.	If you believe that any of the information that we hold about you is inaccurate, you have a right to request that we restrict the processing of that information, and to rectify the inaccurate personal information.  Please note that if you request us to restrict processing your information, we may have to suspend the operation of your account and/or the products, and services we provide to you.
<b>Erasure</b> – You have a right to request that we delete your personal information.	You may request that we delete your personal information if you believe that: <ul style="list-style-type: none"> <li>• we no longer need to process your information for the purposes for which it was provided,</li> <li>• we have requested your permission to process your personal information and you wish to withdraw your consent; or,</li> <li>• we are not using your information in a lawful manner,</li> </ul> Please note that if you request us to delete your information, we may have to suspend the operation of your account and/or the products and services we provide to you,
<b>Restriction</b> – You have a right to request us to restrict the processing of your personal information.	You may request us to restrict processing your personal information if you believe that: <ul style="list-style-type: none"> <li>• any of the information that we hold about you is inaccurate</li> <li>• we no longer need to process your information for the purposes for which</li> </ul>

	<p>it was provided, but you require the information to establish, exercise or defend legal claims; or</p> <ul style="list-style-type: none"> <li>• we are not using your information in a lawful manner.</li> </ul> <p>Please note that if you request us to restrict processing your information, we may have to suspend the operation of your membership account and/or the products and services we provide to you.</p>
<p><b>Portability</b> – You have a right to data portability.</p>	<p>Where we have requested your permission to process your personal information or you have provided us with information for the purposes of entering into a contract with us, you have a right to receive the personal information you provided to us in a portable format.</p> <p>You may also request us to provide it directly to a third party, if technically feasible. We're not responsible for any such third party's use of your account information, which will be governed by their agreement with you and any privacy statement they provide to you.</p>
<p><b>Objection</b> – You have a right to object to the processing of your personal information.</p>	<p>You have a right to object to us processing your personal information (and to request us to restrict processing) for the purposes described in this Privacy Notice), unless we can demonstrate compelling and legitimate grounds for the processing, which may override your own interests, or where we need to process your information to investigate and protect us or others from legal claims.</p> <p>Depending on the circumstances, we may need to restrict or cease processing your personal information altogether or, where requested, delete your information. Please note that if you object to us processing your information, we may have to suspend the operation of your account and/or the products and services we provide to you.</p>
<p><b>Marketing</b> – You have a right to object to direct marketing.</p>	<p>You have a right to object at any time to processing of your personal information for direct marketing purposes, including profiling you for the purposes of direct marketing.</p>
<p><b>Withdraw consent</b> – You have a right to withdraw your consent.</p>	<p>Where we rely on your permission to process your personal information, you have a right to withdraw your consent at any time. We will always make it clear where we need your permission to undertake specific processing activities.</p>
<p><b>Lodge complaints</b> – You have a right to lodge a complaint with the regulator.</p>	<p>If you are concerned about the way we handle your personal information or believe we have processed it in breach of data protection law, you have the right to raise a complaint directly with us as the data controller. We will acknowledge your complaint and respond within a reasonable timeframe in accordance with UK data protection legislation.</p> <p>If you are not satisfied with the outcome of your complaint, or if you believe your data protection rights have not been upheld, you also have the right to lodge a complaint with the Information Commissioner's Office (ICO). The ICO can be contacted via <a href="https://ico.org.uk">ico.org.uk</a> or by using the contact details published on their website.</p>

**If you have any questions about this privacy notice, please contact Data Protection Lead at Staffordshire Chambers of Commerce.**