

BESA Group Data Privacy Notice dated 18th May 2023

Organisation: The BESA
Service: Membership

This privacy register tells you about the personal data we collect and the associated processing activities relevant to delivering this service.

Our role in processing your data

Data Controller – we have overall responsibility for your personal data.

About the personal data we hold

The main categories of personal data we hold about you are as follows:

- Employer Details
- Title and Name
- E-mail address and contact details
- Payment details (held temporarily)

Sensitive Personal Data

The special categories of sensitive personal data that we hold about you are as follows:

- We do not routinely capture any special categories of data.

Why we are capturing your data

We capture your data so we can undertake the following processing activity:

- Scheme sign-up, registration and enrolment
- Membership renewal/termination
- Updating of employer and contact details
- Dealing with enquiries and complaints
- Making you aware of other BESA Group services we would reasonably expect you to have an interest in.

Automated decision making and profiling

There isn't any automated decision making or profiling undertaken within the scope of our processing activity.

Our legal basis for processing your data

We need a clear legal basis for capturing and processing your data. For this service this is:

- Contractual – some of the services we provide is defined by a service agreement or contract.
- Legal Obligation – we are required to undertake some of our processing tasks by law.
- Consent – you may request and consent to specific services or processing activity.

Other legitimate interests

There is a legitimate interest in sharing your data within the BESA Group for the purposes of:

- Utilising BESA IT systems for processing activity.
- Utilising BESA Finance systems for processing activity.
- BESA assessments and audits.
- Making you aware of other BESA Group services we would reasonably expect you to have an interest in.

Who we share your data with

For the purposes specified above, your data will be shared with the following types of organisation.

- Archiving Facilities
- Auditors
- Insurance Services
- Governing Bodies
- Debt Collection Services
- Membership Software Systems

Sending your data outside the UK/ EU / EEA

To achieve the purposes described in this Privacy Policy, we may transfer your Personal Data to countries which do not offer the same level of protection for your personal data as the UK or the European Economic Area.

Where such locations do not offer an adequate level of protection for your Personal Data, we will ensure that your Personal Data will continue to be protected by implementing appropriate safeguards when it is transferred to one of these countries.

Our criteria for retaining your data

The membership service is aimed at companies rather than individuals. Personal data will be retained for the necessary time required to deliver membership services and in line with relevant legislation for data retention. Where membership expires, personal data will be retained for a period of 3 years, so we can deal with any queries relating to BESA membership. After this time only company data is retained.

Consequences of not giving us your data

By not providing the required information, we may not be able to deliver the required service.

Your rights

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- **Right of access**
You have the right to request a copy of the information that we hold about you.
- **Right of rectification**
You have a right to correct data that we hold about you that is inaccurate or incomplete.
- **Right to be forgotten**
In some circumstances you can ask for the data we hold about you to be erased from our records.
- **Right to restrict processing**
Where certain conditions apply to have a right to restrict the processing.
- **Right of portability**
You have the right to have the data we hold about you transferred to another organisation.
- **Right to object**
You have the right to object to certain types of processing such as direct marketing.
- **Right to object to automated processing, including profiling**
You also have the right to object to the legal effects of automated processing or profiling.

Your consent

By consenting to this privacy notice you are giving us permission to process your personal data for the purposes identified. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used. You may withdraw consent at any time.

If you have a complaint

Should you wish to complain about how your data is being handled, in the first instance please contact the GDPR Owner specified below. If your complaint is not handled to your satisfaction, you also have the right to raise your concerns with the relevant supervisory authority.

Details of the data controller

GDPR Owner
BESA Group
Old Mansion House
Eamont Bridge
Penrith
CA10 2BX



The supervisory authority for data protection

Supervisory Authority: Information Commissioner's Officer (ICO)

Website: <http://ico.org.uk>

Telephone: 0303 1231113