

## **BESA Group Data Privacy Notice**

**Organisation:** BESA Publications Ltd  
**Service:** SFG20

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 process are as follows:

- Company Name and Address
- Contact Name and Telephone Number
- Email Addresses

### **How we acquire your personal data**

The personal data we process is either given by consent as part of an interaction or engagement with SFG20, or from other publicly available data sources such as LinkedIn or Companies House. We also gather data as part of any contractual process.

With consent, the SFG20 website also processes the public IP address of visitors in order to identify company data, i.e., to identify which companies have visited our website. A third-party solution then matches this with publicly available data sources to build a company profile, including data on:

- Company Revenue
- Employees (company size)
- Head Office Address
- Website
- Mainline Number
- Industry
- Company Description
- Directors (Name, Title, Contact Information)

### **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:

- To inform you of relevant products and services.
- Draft, send and review applicable contracts
- Allow access to SFG20 web-based application including free trials and online demonstrations
- Subscription invoicing and payments including setting up direct debits when required
- Issuing notifications concerning technical and software updates
- Communications relevant to the service
- Training (as required)
- Helpdesk service.

### **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:

- Consent – we use consent as the legal basis of our online cookie policy.
- Contractual – SFG20 subscription contract and non-disclosure agreements when applicable for Consultancy work (SFG20 Solutions).
- Legitimate Interest – we may contact you about related products and services that we believe you have a genuine interest in – you can opt out at any time.

### **Other legitimate interests**

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

- Utilising BESA Group IT systems for processing activity
- Utilising BESA Group financial services for processing activity
- Making you aware of our SFG20 Products and related BESA services we provide.

#### **Who we share your data with**

To enable us to deliver this service, your data may be shared with the following types of organisation:

- Banks and Accountants
- Legal Services (Solicitors & Lawyers)
- Auditors
- Third-party payment systems
- Third-party technical advisers
- Software solutions

#### **Sending your data outside the EU / EEA**

Personal data is not transferred to a third-party outside of the European Union or European Economic Area.

#### **Our criteria for retaining your data**

SFG20 provides a business-to-business service that sets standards for building maintenance. For the purposes of audit and to support / mitigate any future legal challenges, SFG20 will retain records indefinitely. However, we will minimise any non-essential personal data within that archive.

#### **Consequences of not giving us your data**

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

#### **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 Data Protection 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**

Data Protection 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