



Terms and Conditions of Membership

By proceeding with the registration or renewal process for membership of the Forum of Private Business Ltd, you agree to be bound by these terms and conditions. In this document, a member is defined as a member of the Forum of Private Business Ltd.

1. Parties

These terms and conditions form the basis of the legal relationship between a member and the Forum of Private Business Ltd.

2. Applications for Membership

Membership of the Forum of Private Business Ltd is open to any privately-owned business based in the UK only

3. Membership Fees

- 3.1 You agree to pay an annual payment (annual subscription) to the Forum of Private Business, the sum of which is set by the Forum of Private Business and may be varied from time to time.
- 3.2 Payment of the annual subscription is due in full at the start of your membership and annually thereafter. Annual subscriptions are payable in full at the commencement and at each renewal date.
- 3.3 Membership of the Forum of Private Business is for 12 months and shall renew annually unless terminated in accordance with clause 4.
- 3.4 Start-up Forum of Private Business Membership is £99 per annum; this will be for a period of 3 years only payable annually as per point 3.3.
- 3.5 Should your Start-up business employ staff within the 3 year period, you will need to advise the Forum of Private Business for your membership to be amended as per standard rate of membership.
- 3.6 Start-up Forum of Private Business membership will revert to standard membership after 3 years to the Forum of Private Business standard membership.
- 3.7 Membership schemes arranged with the Forum of Private Business will be at the agreed pricing. All other terms and conditions will also apply.

4. Termination of Membership

- 4.1 Should you wish to cancel your membership, you are required to do so in writing not less than 30 days from the date of renewal. Unless such notice of intention is given, subscriptions are payable in full annually.
- 4.2 The Forum of Private Business Ltd will be entitled to cancel your membership if:
 - 4.2.1 Any fee including but not limited to the annual subscription fee remains unpaid for a period of one month from the date that payment is due;
 - 4.2.2 You (in the opinion of the Forum of Private Business Ltd) behave inappropriately towards other members or towards the Forum of Private Business Ltd;
 - 4.2.3 You (in the opinion of the Forum of Private Business Ltd) bring the Forum of Private Business Ltd into disrepute;
 - 4.2.4 You breach these terms and conditions.

5. Groups of companies

Where a company is part of a group of companies, as a subsidiary or parent company, each business in that group may apply for membership individually or the parent company may apply on behalf of all group companies. Membership fees will be negotiated on a case-by-case basis.

6. Third Parties

No rights are conferred on any person who is not a party to these terms and conditions.

7. Severance

Each provision contained in these terms and conditions shall be severable from any other provisions, and if any part of any provision shall be found to be invalid, illegal or void for any reason, such invalidity, illegality or void shall not affect any other part of such provision or any other provision contained in these terms and conditions, which shall continue to have full force and effect.

8. Entire Agreement

These terms and conditions constitute the entire agreement between the parties and supersede all prior agreements, negotiations, representations and proposals, whether written or oral, concerning the subject matter of the terms.

9. Governing Law

The terms shall be construed in accordance with the laws of England and the parties hereby submit to the exclusive jurisdiction of the English courts.

10. Assignment

You shall not assign any of your rights or obligations under these terms and conditions without our prior written consent. We shall have the right to assign or otherwise delegate all or any of our rights or obligations under these terms and conditions upon notification to you.

11. Telephone Service Charges

Ofcom introduced new telephone regulations in July 2015. The Forum of Private Business Ltd 084 number is being phased out being replaced with local call charge number 01565 626001. Members using 0845 130 1722 should note that calls cost 7 pence a minute (inc VAT) plus company access charges.

12. How we communicate with you our member

As a member of The Forum of Private Business Ltd, you will provide us with your personal details, including your business address, telephone and email details. By giving us this information you are agreeing that we can contact you from time to time (by telephone, email, SMS text message or post), with information related to services, products and events that we have available to our members.

You may, at any time, opt out of receiving communications from us in writing to info@fpb.org or by calling our helpline on 01565 626001.

13. Privacy

The Forum of Private Business Ltd takes your privacy very seriously and we do not share our member data with any further parties. **View our Privacy Policy.**

14. Cookies Usage

The Forum of Private Business Ltd website uses cookies to distinguish you as a website visitor from other users of our website. This helps us to provide the visitor with a good experience when browsing our website. It also will allow us to improve our website. By continuing to browse the site, you are agreeing to our use of cookies. **View our Cookies Policy.**

15. GDPR

From 25.05.2018 the GDPR replaced the DPA 1998 as the leading authority regulating the processing of personal data.

The Forum of Private Business Ltd processes personal data on a daily basis. The GDPR requires us as a business to give information about our data processing activities and how we deal with the information that we hold. View our **Data Protection Policy.**

If you require a copy of our terms and conditions contact our helpline on 01565 626001.

Reviewed: July 2018



Data Protection Policy (1 of 3)

Date of publication: 24th May 2018

Date of Review: 24th May 2020

Responsibility: The Data Controller, Data Protection Policy

Rationale

The Forum of Private Business (the Forum) is committed to a policy of protecting the rights and privacy of individuals, including members, staff and others, in accordance with the *General Data Protection Regulation (GDPR) May 2018*.

The new regulatory environment demands higher transparency and accountability in how membership organisations use personal data. It also accords new and stronger rights for individuals to understand and control that use.

The GDPR contains provisions that the Forum of Private Business will need to be aware of as data controller and processor, including provisions intended to enhance the protection of members'.

Personal data. For example, the GDPR requires that:

We must ensure that our privacy notices are written in a clear, plain way that staff and members will understand.

The Forum needs to process certain information about its staff, members and others with whom it has a relationship for various purposes such as, but not limited to:

1. The recruitment and payment of staff.
2. The administration of Memberships.
3. Provide assistance and advice to Members.
4. Recording advice is given for legal and contractual obligations.
5. Collecting fees.
6. Complying with legal obligations to funding bodies and government including local government.

To comply with various legal obligations, including the obligations imposed on it by the General Data Protection Regulation (GDPR) the Forum must ensure that all this information about individuals is collected and used fairly, stored safely and securely, and not disclosed to any third party unlawfully.

Compliance

This policy applies to all Staff and Members of the Forum. Any breach of this policy or of the Regulation itself will be considered an offence and the disciplinary procedures will be invoked.

As a matter of best practice, other agencies and individuals working with the Forum and who have access to personal information will be expected to read and comply with this policy. It is expected that departments who are responsible for dealing with external bodies will take the responsibility for ensuring that such bodies sign an agreement to abide by this policy.

This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments to the GDPR and other relevant legislation.

General Data Protection Regulation (GDPR)

This piece of legislation comes in to force on the 25th May 2018. The GDPR regulates the processing of personal data, and protects the rights and privacy of all living individuals (including children), for example by giving all individuals

who are the subject of personal data a general right of access to the personal data which relates to them. Individuals can exercise the right to gain access to their information by means of a 'subject access request'. Personal data is information relating to an individual and may be in hard or soft copy (paper/manual files; electronic records; photographs; CCTV images), and may include facts or opinions about a person.

For more detailed information on these Regulations see the Data Protection Data Sharing Code of Practice (DPCoP) from the Information Commissioner's Office (ICO). Please follow this link to the ICO's website (www.ico.gov.uk)

Data Protection Principles

The legislation places a responsibility on every data controller and data processor to process any personal data in accordance with the eight principles. More detailed guidance on how to comply with these principles can be found in the DPCoP. Please follow this link to the ICO's website (www.ico.gov.uk) In order to comply with its obligations, the Forum undertakes to adhere to the eight principles:

1. Process personal data fairly and lawfully.

The Forum will make all reasonable efforts to ensure that individuals who are the focus of the personal data (data subjects) are informed of the identity of the data controller/ data processor, the purposes of the processing, any disclosures to third parties that are envisaged; given an indication of the period for which the data will be kept, and any other information which may be relevant.

2. Process the data for the specific and lawful purpose for which it collected that data and not further process the data in a manner incompatible with this purpose.

The Forum will ensure that the reason for which it collected the data originally is the only reason for which it processes those data unless the individual is informed of any additional processing before it takes place

3. Ensure that the data is adequate, relevant and not excessive in relation to the purpose for which it is processed.

The Forum will not seek to collect any personal data which is not strictly necessary for the purpose for which it was obtained. Forms for collecting data will always be drafted with this mind. If any irrelevant data are given by individuals, they will be destroyed immediately.

4. Keep personal data accurate and, where necessary, up to date.

The Forum will review and update all data on a regular basis. It is the responsibility of the individuals giving their personal data to ensure that this is accurate, and each Individual should notify the Forum if, for example, a change in circumstances means that the data needs to be updated. It is the responsibility of the Forum to ensure that any notification regarding the change is noted and acted on.

5. Only keep personal data for as long as is necessary.

The Forum undertakes not to retain personal data for longer than is necessary to ensure compliance with the legislation and any other statutory requirements. This means the Forum will undertake a regular review of the information held and implement a weeding process.

The Forum will dispose of any personal data in a way that protects the rights and privacy of the individual concerned (e.g. secure electronic deletion, shredding and disposal of hard copy files as confidential waste). A log will be kept of all records destroyed.



Data Protection Policy (2 of 3)

6. Process personal data in accordance with the rights of the data subject under the legislation.

Individuals have various rights under the legislation including a right to:

- Be told the nature of the information FPB holds and any parties to whom this may be disclosed.
- Prevent processing likely to cause damage or distress.
- Prevent processing for purposes of direct marketing.
- Be informed about the mechanics of any automated decision-making process that will significantly affect them.
- Not have significant decisions that will affect them taken solely by an automated process.
- Sue for compensation if they suffer damage by any contravention of the Legislation.
- Take action to rectify, block, erase or destroy inaccurate data.
- Request that the Office of the Information Commissioner assess whether any provision of the Act has been contravened.

The Forum will only process personal data in accordance with individuals' rights.

7. Put appropriate technical and organisational measures in place against unauthorised or unlawful processing of personal data, and against accidental loss or destruction of data.

All members of staff are responsible for ensuring that any personal data which they hold is kept securely and not disclosed to any unauthorised third parties.

The Forum will ensure that all personal data is accessible only to those who have a valid reason for using it.

The Forum will have in place appropriate security measures examples include but are not limited to:

- Keeping all personal data in a lockable cabinet with key-controlled access.
- Password protecting personal data held electronically.
- Holding all member data on a secure CRM system.
- Ensuring any data sent to third parties for the purposes of advice under the membership is sent in a secure and encrypted manner.
- Archiving personal data which are then kept securely.
- Annually deleted aged/ irrelevant data/ incorrect data.
- Placing any PCs or terminals, CCTV camera screens etc. that show personal data so that they are not visible except to authorised staff.
- Ensuring that PC screens are not left unattended without a password protected screen-saver being used.

In addition, the Forum will put in place appropriate measures for the deletion of personal data - manual records will be shredded or disposed of as 'confidential waste' and appropriate contract terms will be put in place with any third parties undertaking this work. Hard drives of redundant PCs will be wiped clean before disposal or if that is not possible, destroyed physically. A log will be kept of the records destroyed.

This policy also applies to staff and third parties who process personal data 'off-site', e.g. when working at home, and in circumstances, additional care must be taken regarding the security of the data.

8. Ensure that no personal data is transferred to a country or a territory outside

the European Economic Area (EEA) unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

The Forum will not transfer data to such territories without the explicit consent of the individual.

This also applies to publishing information on the Internet - because a transfer of data can include placing data on a website that can be accessed from outside the EEA - so the Forum will always seek the consent of individuals before placing any personal data (including photographs) on its website.

If the Forum collects personal data in any form via its website, it will provide a clear and detailed privacy statement prominently on the website, and wherever else personal data is collected.

Consent as a basis for processing

Although it is not always necessary to gain consent from an individual before processing their data, it is often the best way to ensure that data is collected and processed in an open and transparent manner.

Consent is especially important when the Forum is processing any sensitive data, as defined by the legislation.

The Forum understands consent to mean that the individual has been fully informed of the intended processing and has signified their agreement (e.g. via the joining form) whilst being of a sound mind and without having any undue influence exerted upon them. Consent obtained on the basis of misleading information will not be a valid basis for processing. Consent cannot be inferred from the non-response to a communication.

Personal Details

- *For the purposes of the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679 you consent to FPB holding and processing personal data including sensitive personal data of which you are the subject, details of which are specified in the Forum's data protection policy.*
- *This will include marketing images and the FPB CCTV.**

The Forum will ensure that any forms used to gather data on an individual will contain a statement (fair collection statement) explaining the use of that data, how the data may be disclosed and also indicate whether or not the individual needs to consent to the processing.

The Forum will ensure that if the individual does not give his/her consent for the processing, and there is no other lawful basis on which to process the data, then steps will be taken to ensure that processing of that data does not take place.

Subject Access Requests

Individuals have a right to access any personal data relating to them which are held by FPB. Any individual wishing to exercise this right should apply in writing to the DPO. Any member of staff receiving a SAR should forward this to the DPO.

Under the terms of the legislation, any such requests must be complied with within 30 days.

Disclosure of Data

Only disclosures which have been notified and agreed with the approved and authorised third parties must be made and therefore staff should exercise caution when asked to disclose personal data held by another individual or third party.



FORUM of
PRIVATE BUSINESS

For our members, not for profit

Data Protection Policy (3 of 3)

The Forum undertakes not to disclose personal data to unauthorised third parties, including unnamed employees of members.

Legitimate disclosures may occur in the following instances:

- The individual has given their consent to the disclosure.
- The disclosure is in the legitimate interests of the member.
- The disclosure is required for the performance of a contract.
- The disclosure is a legal obligation.
- The disclosure is the public interest.

In no circumstances will the Forum sell any of its databases to a third party.

Reviewed: July 2018

For our members,
not for profit



FORUM of
PRIVATE BUSINESS

For our members, not for profit

Cookie Policy

Information about our use of cookies.

The Forum of Private Business Ltd website uses cookies to distinguish you as a website visitor from other users of our website. This helps us to provide you the visitor with a good experience when browsing our website.

Cookies also allow us to improve our website experience. By continuing to browse the site, you are agreeing to our use of cookies.

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server. The only cookies we use are:

- **Strictly necessary cookies.** These are cookies that are required for our website. They include cookies that enable members to log into secure areas of our website, to use a shopping cart for purchasing services.
- **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Function cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences.
- **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your requirements. We may also share this information with third parties for this purpose.

Both first and third-party cookies are used within our website at fpb.org

- First party cookies are set by the website that you are visiting and can only be read by that website.
- Third party cookies are set by an organisation other than owner of the website. This can be for the purpose of website measurement, being able to watch a video on our site or for the purpose of advertising.

Cookies can last for different lengths of time, depending on what they are used for, for example:

- **Session cookies** are temporary cookies and are stored until you leave the website or when you close your web browser. They are then removed.
- **Persistent cookies** last for a fixed period of time, defined within the cookie, and allow the website to recognise the device again when the user returns to that website on that device. We as a business will set these cookies from 30 to 90 days.

As a visitor to our website at fpb.org you are able to block cookies by activating the settings within your own browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website and your user experience will be affected.

Reviewed: July 2018

For our members,
not for profit



Privacy Policy (1 of 5)

Date of publication: 24th May 2018

Date of Review: 24th May 2020

Responsibility: The Data Controller, Data Protection Policy

Forum of Private Business is committed to protecting the privacy and security of your personal information of our member and partners.

The Forum of Private Business understands that your personal data is entrusted to us and appreciates the importance of protecting and respecting your privacy. To this end, we comply fully with the data protection law in force in the UK and operate fully within the guidelines of the General Data Protection Regulations effective May 2018.

Our privacy policy shows that any personal data we collect, or that is provided to us, will be processed by only us. By reading the following, you will understand our views and practices regarding personal data and how it is used. By visiting our website fpb.org, by providing personal data to us, you are accepting and giving your consent to the practices described in this policy in accordance with the General Data Protection Regulation (GDPR).

For the purpose of the Data Protection Act 1998 (the Act), Forum of Private Business, Ruskin Chambers, Drury Lane, Knutsford, Cheshire WA16 6HA is the "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

When we refer to 'we', 'us' and 'our', we mean The Forum of Private Business, our website, our online sales, our helpline and all aspects of using www.fpb.org

This notice applies to current and former employees, members, non-members, partners, workers, and contractors. This notice does not form part of any contract of employment or another contract to provide services. We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you so that you are aware of how and why we are using such information.

Data Protection Principles

We will comply with data protection law. This says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

The kind of information we hold about you

When we refer to personal data in this policy we mean information that can or has the potential to identify you as an individual. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection though it is unlikely that we will collect this type of data from you.

We will collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth (excluding the year of birth).
- Gender.
- Marital status and dependents.
- Next of kin and emergency contact information.
- National Insurance number.
- Bank account details, payroll records, and tax status information.
- Salary, annual leave, pension, and benefits information.
- Start date.
- Location of employment or workplace.
- Copy of driving license.
- Copy of passport.
- Recruitment information (including copies of the right to work documentation, references and other information included in a CV or cover letter or as part of the application process).
- Employment records (including job titles, work history, working hours, training records and professional memberships).
- Compensation history.
- Performance information.
- Disciplinary and grievance information.
- Information about your use of our information and communications systems.
- Photographs.
- We may also collect, store and use the following "special categories" of more sensitive personal information:
 - Information about your race or ethnicity, sexual orientation
 - Information about criminal convictions and offences.

How your personal information is collected

Information we collect from our website

With each visit to our website we automatically collect the following information:

- Technical information, including the Internet protocol (IP) address used to connect a computer to the Internet.
- Login information.
- Browser type and version.
- Timezone setting.
- Browser plug-in types and versions.
- Operating system and platform.



Privacy Policy (2 of 5)

- Information about a website visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time); products viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs).
- Methods used to browse away from pages and any phone numbers used to call our helpline number.

Cookies and Other Tracking Technologies

We collect information about your usage and activity on our Sites using certain technologies, such as cookies, web beacons, and other technologies. Third parties may also view, edit, or set their own cookies. We and our third-party service providers, advertisers, and/or partners may also place web beacons for such third parties. The use of these technologies by such third parties is subject to their own privacy policies and is not covered by this Policy, except as required by law.

Information we receive from other sources

We may receive information:

- By completing our forms on our website at fpb.org.
- Corresponding with us by phone, e-mail.
- Becoming a member of the Forum of Private Business.
- Information provided when you register to use our site, subscribe to our services, search for an article or service.
- Completion of the membership application form.
- From any other website, the Forum of Private Business operates or the other services we provide. In this case, we will have informed you when we collected that data that it may be shared internally and combined with data collected on this website.
- Information received from authorised third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

How we will use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform the contract we have entered into with you to manage and fulfill a membership with The Forum of Private Business.
- Where we need to comply with a legal obligation.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- For the fulfillment of goods or services requested.
- To be able to provide you with information about other goods and services our partners or ourselves can offer that are similar to already purchased or enquired about.
- To provide or permit selected third parties providing you, with information about goods or services we feel may interest you.

As an existing member or partner, contacting you by e-mail or SMS text with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you. New members or partners, and where we permit selected third parties to use your personal data, we will contact you by email or SMS text only if you have consented to this. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the membership application form or contact us at info@fpb.org.

- To notify about changes to our service.
- In-house research and statistical analysis.
- To communicate about our membership, lobbying and other activities deemed of interest to you as a member.
- To ensure that content from our website is presented in the most effective manner for our website visitor experience.

Information we collect about you specifically from our website

We will use this information:

- To manage our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- To ensure that content from our website is presented in the most effective manner for our website visitor experience.
- To allow participation in interactive features of our service, when you choose to do so
- As part of our efforts to keep our website safe and secure.
- To measure or understand the effectiveness of advertising we serve to our member and general website visitors, and to deliver relevant advertising.
- To make suggestions and recommendations of our website about goods or services that may interest you or them.

Information we receive from other sources

We may amalgamate this information with the information given to us and information we collect. We may use this information and the amalgamated information for the purposes set out above, depending on the types of information.

Disclosure of information

We may share information with selected third parties including:

- Business partners, suppliers, and sub-contractors for the performance of any contract that The Forum of Private Business enters into. We confirm that the relevant checks have been carried out to ensure all of those third parties as listed in this clause are GDPR compliant. Further information on this can be provided upon request.
- Advertisers and advertising networks that require the data to select and serve relevant adverts.
- Analytics and search engine providers that assist in the improvement and optimisation of our website.

We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to protect your interests (or someone else's interests).
- Where it is needed in the public interest (or for official purposes).



Privacy Policy (3 of 5)

Situations in which we will use your personal information.

Processing of your personal data

We need all the categories of information in the list above primarily to allow us to perform our contract with you and to enable us to comply with legal obligations under the relevant employment laws.

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.

The situations in which we will process your personal information are listed below.

- Making a decision about your membership or partnership contract with us.
- Determining the terms on which you work for/with us.
- Checking you are legally entitled to work in the UK.
- Paying you as per terms and conditions applicable to partners or affiliate networks.
- Providing membership benefits to you as.
- Administering the contract we have entered into with you.
- Business management, planning, and auditing.
- Assessing partner promotions.
- Gathering evidence for possible grievance or disciplinary hearings.
- Making decisions about your continued employment or engagement.
- Education, training and development requirements.
- Dealing with legal disputes involving you, or other employees, workers, and contractors, including accidents at work.
- Complying with health and safety obligations.
- Preventing fraud.
- Monitoring your use of our information and communication systems to ensure compliance with our IT policies.
- Ensuring network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- Conducting data analytics studies to review and better understand employee retention and attrition rates.
- Equal opportunities monitoring.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

Change of purpose

We will only use your personal information for the purposes for which we collected it unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you

and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

How we use particularly sensitive personal information

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

In limited circumstances, with your explicit written consent.

Where we need to carry out our legal obligations or exercise rights we have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

Where it is needed in the public interest, such as for equal opportunities monitoring we have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public. We may also process such information about members or former members in the course of legitimate business activities with the appropriate safeguards.

Do we need your consent?

We do not need your consent if we use your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the fields of employment law and contract law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

Data sharing

We may have to share your data with third parties, including third-party service providers and other entities in the group. We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

Which third party service providers process my personal information?

"Third parties" includes third party service providers (including contractors and designated agents) and other entities within our group. The following activities are carried out by third party service providers: e.g. payroll, pension administration, benefits provision and administration and IT services.



Privacy Policy (4 of 5)

How secure is my information with third-party service providers and other entities in our group?

All our third party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

What about other third parties?

We may share your personal information with other third parties e.g. in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

Data security

- We have put in place measures to protect the security of your information. Details of these measures are available upon request.
- We take commercially-reasonable technical, administrative, and physical security measures designed to protect your information from loss, misuse, unauthorized access, disclosure, alteration, and destruction.
- When your credit or debit card account information is being transmitted to our Sites or through our Sites, it will be protected by cryptographic protocols.
- We cannot guarantee that transmissions of your credit or debit card account information or your other information will always be secure or that unauthorized third parties will never be able to defeat the security measures taken by us or our third-party service providers.
- Except to the extent that liability cannot be excluded or limited due to applicable law, we assume no liability or responsibility for disclosure of your information due to errors in transmission, unauthorized third-party access, or other causes beyond our control. You play an important role in keeping your information secure. You should not share your username, password, or other security information for your account with anyone. If we receive instructions using your user name and password, we will consider that you have authorized the instructions. If you have reason to believe that your interaction with us is no longer secure (eg, if you feel that the security of any account you might have with us has been compromised), please contact us immediately at marketing@fpb.org.
- Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.
- We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from the data protection officer.
- We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal information are available in our retention policy which is available from the data protection officer.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means and the applicable legal requirements.

In some circumstances, we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee, worker or contractor of the company we will retain and securely destroy your personal information in accordance with our data retention policy.

We have created a specific data retention policy. This can be made available to any forum member upon request.

Your rights in connection with personal information

Rights of access, correction, erasure, and restriction

Under certain circumstances, by law, you have the right to:

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to the processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you e.g. if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the data protection officer in writing. No fee usually required.



FORUM of
PRIVATE BUSINESS

For our members, not for profit

Privacy Policy (5 of 5)

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

Your Choices

Email - If you do not want to receive marketing and promotional emails from us, you may click on the "unsubscribe" link in the email to unsubscribe and opt-out of marketing email communications. If you have an account with us, you may also opt-out of marketing emails in your account settings.

Alternatively, to the extent that applicable law requires your prior opt-in consent to receive marketing and promotional emails, you can choose not to opt-in. Please note that even if you opt-out of receiving marketing communications from one or all of our Sites, we may need to send you service-related communications.

Application location choices - As detailed in the Information 'We Collect' section, above, we may collect information about your location if you enable location services through the settings in your mobile device, or, as required, with your consent. You can change the privacy settings of your device at any time to turn off the sharing of this location information with our Sites.

If you choose to turn off location services, this could affect certain features or services of our Sites. If you have specific questions about the privacy settings of your device, we suggest you contact the manufacturer of your device or your mobile service provider for help.

Access and correction of your information

If you have created an online account with us and would like to update the information you have provided to us, you can access your account to view and make changes or corrections to your information. You may also contact us as at marketing@fpb.org

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing, and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact Leanda Hickman, Marketing Manager at Forum of Private Business, Ruskin Chambers, Drury Lane, Knutsford, Cheshire WA16 6HA. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Data Protection Officer

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

The Data Controller
Forum of Private Business
Ruskin Chambers
Drury Lane
Knutsford
WA16 6HA

Reviewed: July 2018

For our members,
not for profit