



## Privacy Policy (1 of 5)

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**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](http://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](http://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.



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- 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](http://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](mailto: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).



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### 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.

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### 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](mailto: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.



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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](mailto: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  
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