

Co-operatives UK Privacy Notice

The short version...

We will never sell or publish your personal data without explicit consent.

We may use the contact details that you have provided to us to tell you about our recent activity, services and events. You can ask us to stop doing this at any time, including by emailing data@uk.coop

We may share limited personal information with third parties where we are required to, where it is necessary to fulfil a contract we have with you or to help us evaluate our impact.

What is the purpose of this document?

As the voice of the UK's co-operative movement, we empower and support co-operative enterprise with specialised knowledge and expertise, to grow the co-operative economy and create a fairer society. Our mission is to empower and grow the UK's co-operative economy by being the voice of co-operation and member ownership.

In our work, we look to operate in line with international and longstanding co-operative values and this includes operating in an open and responsible way when it comes to protecting the privacy and security of your personal information.

This privacy notice describes how we collect, use and protect personal information about you during and after your relationship with us, in accordance with the UK's framework of Data Protection Law.

Co-operatives UK is a 'data controller'. This means 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. This notice applies to current and former members of Co-operatives UK and all other contacts. This notice does not apply to employees, or job applicants separate Privacy Notices explain our use of the personal data in these scenarios. This notice does not form part of any contract with you. We may update this notice at any time.

We may provide additional privacy information on specific occasions when we are collecting or processing personal information about you, so you are aware of how and why we are using such information. The information used in any short-form privacy notices will align with what this document states.

Data protection principles

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

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

The kind of information we hold about you

Personal data, or personal information, means any information about a person which could identify who they are. It does not include data where the identity has been removed (anonymous data) or data relating solely to an organisation/corporate body.

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

- Name.
- Contact details including email address, phone number and social media usernames.
- Date of birth – where you are or will be a director or where you are subject to anti-money laundering checks.
- Organisation – any organisation that we know you are affiliated to which is a member or potential member of Co-operatives UK.
- Job title if you're employed in a relevant role by a member or potential member of Co-operatives UK.
- Details of how you have used Co-operatives UK products and services, events you have attended, surveys and consultations you have responded to and how you have interacted with our email and web content and any feedback collected.
- Bank account and payment details used to enter into/renew membership of Co-operatives UK and purchase or supply products/services.
- When registering for events we ask for dietary requirements and requirements around access (e.g. disabilities).
- Where a client has asked us to incorporate an entity on their behalf we collect information necessary to process the incorporation which includes more personal detail required by law. This will be explained to you when you ask us to complete this service for you.
- Information you have requested on our products and services.
- Technical Data including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access our website. Plus information about how you interact with and use our website, products and services.

We may also collect, store and use the following 'special categories' of more sensitive personal information:

- Political opinions – where you have responded to a policy consultation and expressed a political opinion.
- Data concerning health – where it may affect your attendance at our events or if required as a result of access needs or an accident occurring in Holyoake House.

We also collect, use and share aggregated data such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific website feature in order to analyse general trends in how users are interacting with our website to help improve the website and our service offering.

How is your personal information collected?

Your interactions with us - We normally collect the personal information that individuals provide to us directly from them including through online forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- complete your organisation's application to become a member
- request to use our products or services;
- book onto an event or training course;
- become a supplier to Co-operatives UK;
- apply to one of our funded programmes of support;
- create an account on our website;
- subscribe to our newsletters, emails and publications;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us feedback or contact us.

Automated technologies or interactions - As you interact with our website, we will automatically collect some Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive some limited Technical Data about you if you utilise WiFi in Holyoake House.

Third parties or publicly available sources - We may sometimes collect additional information from third parties, including:

- Publicly available sources including corporate registrars such as Companies House and Financial Conduct Authority (FCA)
- Co-operative development bodies
- Delivery partners
- Analytics providers such as Google based outside the UK
- Providers of technical, payment and delivery services
- Via organisations you are affiliated with.

How we will use information about you

We will only use your personal information when the law allows us to. The law requires us to have a legal basis for collecting and using your personal data, a full and detailed record of our processing activities is kept in a separate document which is available on request to data@uk.coop. In summary, we will use your personal information in the following circumstances:

Situations in which we will use your personal information	Purpose of data processing
Where we need to fulfil a contract with you	Where we need to perform the contract we are about to enter into or have entered into with you including: <ul style="list-style-type: none"> ▪ When you have purchased a product or service from us ▪ Where you have applied to be included in a funded programme of work ▪ To manage a supplier relationship or tenancy ▪ To manage payments, fees and charges including to collect and recover money owed to us ▪ Facilitating your membership of Co-operatives UK, its operations and governance. ▪
Where we need to comply with a legal obligation	We may be subject to legal obligations such as: <ul style="list-style-type: none"> To conduct anti-money laundering checks. ▪ To comply with our rules and corporate legislation (eg sending notices of meetings and renewal requests to members via their Secretary/Principal Contact, maintaining our statutory registers) ▪ To enable us to provide the service of handling Employment Tribunal claims on behalf of member organisations ▪ To comply with data protection requirements (eg erasure of your personal data after a retention period passes). ▪ To meet our Health and Safety obligations ▪ Dealing with your requests, complaints and queries.
Where you have freely given your consent to us using your personal information for one or more specific purposes	We will request your active consent before you provide any personal data to us in situations including: <ul style="list-style-type: none"> ▪ Where you as an individual (not associated with an organisation) have signed up to hearing more about what Co-operatives UK is doing and the services we provide

	<ul style="list-style-type: none"> ▪ To use photos of you taken at our events in marketing and promotional materials ▪ To document our policy positions and inform lobbying following your response to a consultation ▪ Where an individual (not associated with an organisation) wishes to be one of our approved providers
<p>Where it is necessary to conduct our business and pursue our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests</p>	<p>We make sure we consider any potential impact on you and your rights. We have a legitimate interest in achieving our strategic goals. Relying on this lawful basis will include using personal data to:</p> <ul style="list-style-type: none"> ▪ Prevent fraud and enable us to give you the best and most secure customer experience ▪ Enhance security of Holyoake House by using CCTV ▪ Administer and protect our business and website (including troubleshooting, data analysis, testing, maintenance, support, reporting and hosting of data) ▪ Email 'corporate subscribers' about what Co-operatives UK is doing and the services we provide* (corporate subscribers are email addresses associated with an organisation that we have a relationship with) ▪ To keep you informed of similar products and events to ones you as an individual (not associated with an organisation) have previously purchased from Co-operatives UK* <p>We may also analyse your contact with us, data from your technical, usage and profiles to form a view of which products, services and events may be of interest to you so that we can then send you relevant marketing communications</p> <p>*unless you have specifically informed that you do not wish to receive such communications from us.</p>
<p>We may also use your personal information in the following situations, which are likely to be rare:</p>	
<p>Where we need to protect your (or someone else's) interests</p>	<ul style="list-style-type: none"> ▪ Where we are asked by legitimate external agencies and authorities to share this information.
<p>Where it is needed in the public interest or for official purposes</p>	

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

You can ask us to stop sending you marketing communications at any time by any of the following:

- logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences;
- following the opt-out links within any marketing communication sent to you; or
- by contacting us on data@uk.coop

If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for membership, administrative or customer service purposes for example relating to your organisation's active membership of Co-operatives UK, a product/service you have purchased, to progress a complaint you have made and checking that your contact details are correct.

If you fail to provide certain information when requested, we may not be able to fulfil contracts with you.

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. In almost all circumstances, we will only use this information if you have freely given your informed and unambiguous consent. Exceptions are where we are under a legal obligation including where the special category data is being processed for the establishment, exercise or defence of legal claims.

Our special category data policy provides detail regarding how we use and protect this particularly sensitive personal information. A copy is available on request to data@uk.coop

Data sharing

- We may have to share your data with third parties, including third-party service providers. 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 UK. 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 fulfil a contract for goods or services with you, to administer our membership relationship with you or where we have another legitimate interest in doing so especially where that enables us to provide you with a better service. This includes:

- Where a third party is contracted to provide a service to Co-operatives UK which necessitates them processing your personal data
- Providing information to registrars at the request of an organisation (eg The FCA to register a new co-operative)
- Upholding our health and safety obligations with regards to Holyoake House
- if you have access needs or meal requirements, we may pass on your basic details to an event venue but only to make your attendance as comfortable as possible.
- To fulfil contracts and client instructions where it is necessary to obtain legal advice, enable representation or comply with tribunal orders and statutory requirements.
- To evaluate the impact of programmes of work.

Which third-party service providers routinely process my personal information?

"Third parties" includes third-party service providers (including contractors and designated agents) and other entities. The following activities are carried out by third-party service providers:

- Provision of IT services
- Formation of companies
- Identity checks for compliance with anti-money laundering legislation and company formation

How secure is my information with third-party service providers?

All our third-party service providers 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.

When might you share my personal information with third parties?

We may share your personal information with third parties, for example in the context of where we have a legitimate business relationship with a contractor to deliver services on our behalf or to perform a contract, and to comply with anti-money laundering legislation. We may also need to share your personal information with a regulator or to otherwise comply with the law.

Transferring information outside the UK

We may transfer the personal information we collect about you to outside the UK to the EU and the USA, for processing and storage. To ensure your personal information receives an adequate level of protection we have put in place appropriate measures to ensure your personal information is treated by those third parties in a way that is consistent with and which respects UK laws on data protection. Further information about protective measures can be requested from Co-operatives UK's Data Protection Lead.

Data security

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

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 it. 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 Co-operatives UK.

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 fulfil 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 record of processing activities and retention policy which is available from Co-operatives UK.

To determine the appropriate retention period for personal data, we consider the applicable legal, regulatory, tax, and accounting requirements, 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.

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.

We will retain and securely destroy your personal information in accordance with our data retention policy and/or applicable laws and regulations.

Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information

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 processing it lawfully.
- **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). We may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to 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, for example 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 our data protection lead using data@uk.coop.

No fee usually required

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

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 circumstances where you 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 Co-operatives UK, using the details at

the end of this notice. 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.

Responsible Person

Zena King - Senior Governance Advisor is our data protection lead and oversees compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact our data protection lead. 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. However, before doing so please make sure you have first made your complaint to us or asked us for clarification if there is something you do not understand. The ICO will expect you to have done this before reviewing your complaint.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, we will ensure that our communications always provide a link to the most up to date version of our privacy notice and that it is always available on our website. We may also notify you in other ways from time to time about significant changes to our privacy notice or the processing of your personal information.

If you have any questions about this privacy notice or our data protection processes, please contact us:

By email: data@uk.coop

By phone: 0161 2141 750

In writing – Data Protection Lead, Co-operatives UK,
Holyoake House, Hanover Street, Manchester, M60 0AS