



Privacy Notice

Co-operatives UK
Privacy Notice

May 2018

Co-operatives UK Privacy Notice

What is the purpose of this document?

Our mission is to support co-operative enterprises across the UK. We help them to start, grow and flourish. 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 and use personal information about you during and after your relationship with us, in accordance with the General Data Protection Regulation (GDPR).

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 form part of any contract with you. 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 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:

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 an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

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 username.
- Date of birth – where we need to conduct money laundering checks.
- Organisation – any organisation that we know you are affiliated to.
- Job title.
- Details of how you have used Co-operatives UK products, services and events attended and how you have interacted with our email and web content and any feedback collected.
- Bank details used to enter into/renew membership of Co-operatives UK and purchase 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 a person's National Insurance number, mother's maiden name, town of birth and 'names previously known by'.
- Information you have requested on services and products.

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 an opinion on a political issue.
- Medical conditions – where it may affect your attendance at events.
- Race and ethnicity – we will only collect this data for directors of our members to monitor the diversity of boards.

How is your personal information collected?

We collect personal information about individuals who have come into contact with Co-operatives UK through online forms or direct contact with Co-operatives UK.

We may sometimes collect additional information from third parties, including:

- Corporate registrars such as Companies House and Financial Conduct Authority (FCA).
- Co-operative development bodies.
- Delivery partners.
- 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. Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform a contract we have entered into with you [*]
- 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 [***]
- Where you have freely given, specific, informed and unambiguous consent to the processing of your personal information for one or more specific purposes [****]

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 [*****]

Situations in which we will use your personal information

With reference to the asterisks set out in the list above, we have indicated by asterisks the purpose or purposes for which we are processing or will process your personal information, as well as indicating which categories of data are involved.

- Where we need to perform a contract we have entered into with you: [*]
 - Contacting you with regard to your membership of Co-operatives UK, its operations, events and governance.
 - When you have purchased a product or service from Co-operatives UK.
- Where we need to comply with a legal obligation: [**]
 - Where we need to conduct money laundering checks.
 - To comply with our rules and corporate legislation.
- 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: [***]

- To communicate with you to fulfil our mission to promote, develop and unite the co-operative sector unless you have specifically informed that you do not wish to receive such communications from us.
- Where you have freely given, specific, informed and unambiguous consent to the processing of your personal information for one or more specific purposes: [****]
 - Contacting you with regard to your membership of Co-operatives UK, its operations, events and governance.
 - When you have purchased a product or service from Co-operatives UK.
 - Where you have subscribed to a mailing list to keep informed about our work.

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 we are asked by legitimate external agencies and authorities to share this information.
- Where it is needed in the public interest or for official purposes: [*****]
 - Where we are asked by legitimate external agencies and authorities to share this information.

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 fulfil our contract 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. We have in place an appropriate written policy document and safeguards which we are required by law to maintain when processing such data.

Our obligations

We will use your particularly sensitive personal information in the following ways:

- Political opinions – where you have responded to a policy consultation and expressed an opinion on a political.
- Medical conditions – where it may affect your attendance at events.
- Race and ethnicity – we will only collect this data for directors of our members to monitor the diversity of boards.

Do we need your consent?

We may approach you for your written consent to allow us to process certain particularly sensitive personal 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, in accordance with our written policy

document, there are circumstances permitted by law where we may use particularly sensitive personal data without your consent.

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 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 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.

Which third-party service providers 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
- Compliance with 'anti'-money laundering legislation

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

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 EU

We will transfer the personal information we collect about you to the USA outside the EU for processing and storage. There is an adequacy decision by the European Commission in respect of the USA. This means that the country to which we transfer your data is deemed to provide an adequate level of protection for your personal information. To ensure your personal information receives an adequate level of protection we have put in place the following appropriate measure to ensure your personal information is treated by those third parties in a way that is consistent with and which respects the EU and UK laws on data protection. Organisations processing data in the USA are certified under the Privacy Shield Framework. Further information about protective measures can be requested from Co-operatives UK's Chief Operating Officer.

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. 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 retention policy which is available from Co-operatives UK. 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. 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 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 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 the Chief Operating Officer at Co-operatives UK in writing.

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, 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.

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 Co-operatives UK, through the Chief Operating Officer. 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

Our Chief Operating Officer oversees compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the Chief Operating Officer. 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.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact The Chief Operating Officer at Co-operatives UK.