DATA PROTECTION POLICY Of SHREWSBURY BUSINESS CHAMBER



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1. INTRODUCTION

- 1.1 We hold personal data about our Members for the purpose of representing the Members in relation to business issues in Shrewsbury, communicating information to firms on local issues, Chamber events, and recording payments of membership fees and issuing reminders for such payments.
- 1.2 The policy sets out how we seek to protect personal data and ensure the Committee understands the rules governing use of personal data to which they have access in the course of Chamber business.

2. **DEFINITIONS**

2.1 In this policy the following expressions have the following meanings:-

'Chamber': Shrewsbury Business Chamber

'Committee': the members of the Executive Committee of the Chamber.

'Data Protection Officer': the officer time to time appointed by the Committee having responsibility for complying with data protection legislation.

'Members': individuals, forums, companies and other organisations refers as Members of the Chamber.

'Personal Data': information relating to identifiable individuals, such as Members and employees of Members, suppliers and marketing contacts. Personal data we may gather may include: individuals contact details, educational background and qualifications, and skills marital status, nationality, job title.

3. SCOPE

- 3.1 This policy applies to the Committee. You must be familiar with this policy and comply with its terms.
- 3.2 We may supplement or amend this policy by additional policies and guidelines form time to time. Any new or modified policy will be circulated to Committee Members before being adopted.

4 WHO IS RESPONSIBLE FOR THIS POLICY?

The Data Protection Officer has overall responsibility for this policy and is responsible for ensuring this policy is adhered to by the Committee.

5. OUR PROCEDURES

5.1 Fair and lawful processing.

We must process personal data fairly and lawfully in accordance with individual's rights. This generally means that we should not process personal data unless:

- (a) the individual whose details we are processing has consented to this:
- (b) the processing is:
 - (i) necessary to perform legal obligations or exercise legal rights; or
 - (ii) otherwise in our legitimate interests and does not unduly prejudice the individual's privacy:
- (c) in most cases this provision will apply to routine business data processing activities.

5.2 Accuracy and Relevance

- 5.2.1 We will ensure that any personal data we process is accurate, adequate, relevant and not excessive given the purpose for which it was obtained. We will not process personal data obtained for one purpose for any unconnected purpose unless the individual concerned has agreed to this or would otherwise reasonably expect this.
- 5.2.2 Individuals may ask that we correct inaccurate personal data relating to them.

5.3 Processing data in accordance with the individual's rights

We will abide by any request from an individual not to use their personal data for direct marketing purposes and notify the Committee about any such request.

5.4 Personal Data

We must take reasonable steps to ensure that personal data held by us is accurate and updated as required.

5.5 Data security

We must keep personal data secure against loss or misuse. We will establish what, if any, additional specific data security arrangements need to be implemented where third parties process personal data as a service on our behalf.

5.6 Data retention

We must retain personal data for no longer than is necessary. What is necessary will depend on the circumstances of each case, taking into account the reasons that the personal data was obtained, but should be determined in a matter consistent with our Data retention guidelines, set out in Annex A.

6. SUBJECT ACCESS REQUESTS

- 6.1 Under the Data Protection Act 1998, individuals are entitled (subject to certain exceptions) to request access to information held about them.
- 6.2 If a subject access request is received that request should be referred to the Data Protection Officer.
- 6.3 If an individual requests information held about them we may charge a small fee for providing personal data as permitted by applicable law. This fee will be £10.00 or such other amount as may from time to time be agreed by the Committee.

7. REPORTING BREACHES

All of the Committee have an obligation to report actual or potential data protection compliance failures. This allows us to:

- (a) investigate the failure and take remedial steps if necessary;
- (b) maintain a register of compliance failures.

8. POLICY NOTIFICATION

All of the Committee and new appointees to the Committee will be informed of this policy.

9. MONITORING

All of the Committee must observe this policy, which will be monitored regularly by the Data Protection Officer to make sure it is being adhered to.

10. CONSEQUENCES OF FAILING TO COMPLY

- 10.1 We take compliance with this policy very seriously.
- 10.2 Failure to comply puts the Chamber at risk.
- 10.3 The importance of this policy means that failure to comply with any requirement may lead to dismissal from the Committee and the Chamber.
- 10.4 Any questions or concerns about this policy should be referred to the Data Protection Officer.

ANNEX A DATA RETENTION GUIDELINES

- Data relating to Members will be retained by the Chamber for no more than twelve months following a Member ceasing to be a member of the Chamber.
- 2. At its discretion the Committee may take steps to destroy or delete any data relating to Member(s) at any time following a Member ceasing to be a Member of the Chamber.

IN WITNESS of which the document has been executed on the date set out above

SIGNED as a DEED by VALERIE ANNE EDWARDS Chairman for and on behalf of Shrewsbury Business Chamber In the presence of

DAVID PHILLIPS

WELSH BRIDGE I FRANKWELL SHREVSBURY SX3 8JY

SOLICITOR