#### PRIVACY POLICY

#### **BACKGROUND:**

Womens Business Networking Limited understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, www.womensbusinessnetworking.co.uk ("Our Site") and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. You will be deemed to have accepted the terms of the Privacy Policy on your first use of My Site

### 1. **Definitions and Interpretation**

In this Policy the following terms shall have the following meanings:

"Account" means an account required to access and/or use

certain areas and features of Our Site;

"Cookie" means a small text file placed on your computer or

device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in

Part 14, below; and

"Cookie Law" means the relevant parts of the Privacy and Electronic

Communications (EC Directive) Regulations 2003;

#### 2. Information About Us

Our Site is owned and operated by Womens Business Networking, a limited company registered in England under company number 12638591.

Registered address: The Mill Business Centre, Unit 22, Sir Robert Peel Mill, Mill Lane,

Fazeley, Tamworth B78 3QD

Main trading address: as above

Data Protection Officer:

Email address: Sharon Louca.

Telephone number: 01827 768430.

Postal address: as above.

### 3. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

#### 4. What Is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation

2016/679) (the "GDPR") and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

### 5. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 15.
- b) The right to access the personal data we hold about you. Part 13 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 15 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 15 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to me directly, or I am using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask me for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. I do not use your personal data in this way.

For more information about my use of your personal data or exercising your rights as outlined above, please contact **me** using the details provided in Part 15.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data I hold about you changes, please keep me informed as long as I have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about my use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

I would welcome the opportunity to resolve your concerns myself however, so please

contact me, using the details in Part 15.

#### 6. What Data Do You Collect and How?

Depending upon your use of my Site, I may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. Please also see Part 14 for more information about my use of Cookies and similar technologies and my <a href="Cookie Policy">Cookie Policy</a>. I do not collect any 'special category' or 'sensitive' personal data AND/OR personal data relating to children AND/OR data relating to criminal convictions and/or offences.

Data Collected	How We Collect the Data
Identity Information including First Name, and Surname.	Membership Questionnaire, Booking form, via my website or Eventbrite.
Contact information including address, email address, phone number, social media handles.	Membership Questionnaire, Booking form, via my website or Eventbrite.
Business information including business name, job title, profession, website.	Membership Questionnaire, Booking form, via my website or Eventbrite.
Technical information including, e.g. IP address, browser type and version, operating system.	Please see our Cookie Policy for details.

# 7. How Do You Use My Personal Data?

Under the Data Protection Legislation, I must always have a lawful basis for using personal data. The following table describes how I may use your personal data, and my lawful bases for doing so:

What We Do	What Data We Use	Our Lawful Basis
Registering you on My Site.	Name, Email address, login details.	You have completed the application form to become a member of WBN or you have subscribed via a form.
Providing and managing your Account.	Name, Email address, login details	You have completed the application form to become a member of WBN
Providing and managing your access to My Site	Name, Email address, login details	You have completed the application form to become a member of WBN.
Administering My Site.	Name, Email address, login details	You have completed the application form to become a member of WBN or you have subscribed via a form
Administering our business.	Name, Email address	You have completed the

		application form to become a member of WBN or you have subscribed via a form
Supplying services to you.	Name, Email address	You have completed the application form to become a member of WBN or you have subscribed via a form
Managing payments my services.	Name, Email address	You have paid membership or booked on an event.
Personalising and tailoring our services for you.	Name, Email address	You have completed the application form to become a member of WBN or you have subscribed via a form
Communicating with you.	Name, email, phone, social media, text, messaging	You have completed the application form to become a member of WBN or you have subscribed via a form
Supplying you with information by email AND/OR post that you have opted-in-to (you may opt-out at any time by unsubscribe button on every email	Name, email address, postal address	You have completed the application form to become a member of WBN or you have subscribed via a form

With your permission and/or where permitted by law, I may also use your personal data for marketing purposes, which may include contacting you by email AND/OR telephone AND/OR text message/WhatsApp,Messenger AND/OR post with information, news, and offers on my services. You will not be sent any unlawful marketing or spam. I will always work to fully protect your rights and comply with my obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out' I will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

### I do not use your data for automated profiling.

I will only use your personal data for the purpose(s) for which it was originally collected unless I reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If I do use your personal data in this way and you wish me to explain how the new purpose is compatible with the original, please contact me using the details in Part 15.

If I need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected I will inform you and explain the legal basis which me do so.

In some circumstances, where permitted or required by law, I may process your personal data without your knowledge or consent. This will only be done within the

bounds of the Data Protection Legislation and your legal rights.

# 8. How Long Will You Keep My Personal Data?

I will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long [We] OR [I] Keep It
Identity Information including title and name.	7 years after termination of membership.
Contact information including email address, phone number, social media handles.	7 years after termination of membership.
Business information including Business information including business name, job title, profession.	7 years after termination of membership.
Technical information including, e.g. IP address, browser type and version, operating system.	Please see our Cookie Policy for details.

# 9. How and Where Do You Store or Transfer My Personal Data?

We may store or transfer some or all of your personal data in countries that are not part of the [European Economic Area (the "EEA" consists of all EU member states, plus Norway, Iceland, and Liechtenstein)] **OR** [EEA]. These are known as "third countries" and may not have data protection laws that are as strong as those in the UK and/or the EEA. This means that we will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation as follows:

#### AND/OR

We will only transfer your personal data to third countries whose levels of data protection are deemed 'adequate' by the European Commission. More information is available from the European Commission.

#### AND/OR

Where we transfer your data to a third party based in the US, the data may be protected if they are part of the EU-US Privacy Shield. This requires that third party to provide data protection to standards similar to those in Europe. More information is available from the <u>European Commission</u>. Please contact us using the details below in Part 15 for further information about the particular data protection mechanisms used by us when transferring your personal data to a third country.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your

personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so;

# 10. Do You Share My Personal Data?

We will not share any of your personal data with any third parties for any purposes, subject to the following exceptions.

We sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

If any of your personal data is shared with a third party, as described above, I will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, my obligations, and the third party's obligations under the law, as described above in Part 9.

If any personal data is transferred outside of the EEA, I take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation, as explained above in Part 9.

If I sell, transfer, or merge parts of my business or assets, your personal data may be transferred to a third party. Any new owner of my business may continue to use your personal data in the same way(s) that I used it, as specified in this Privacy Policy.

In some limited circumstances, I may be legally required to share certain personal data, which might include yours, if I am involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

### 11. How Can I Access My Personal Data?

If you want to know what personal data I have about you, you can ask me for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 15.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover my administrative costs in responding.

I will respond to your subject access request within 28 days and, in any case, not more than one month of receiving it. Normally, I aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date I receive your request. You will be kept fully informed of my progress.

# 12. How Do You Use Cookies?

My Site may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by me and are used only by me. I use Cookies to facilitate and improve your experience of my Site and to provide and improve my services. I have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

All Cookies used by and on My Site are used in accordance with current Cookie Law.

Before Cookies are placed on your computer or device, you will be shown a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling me to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of my Site may not function fully or as intended. You will be given the opportunity to allow only first-party Cookies and block third-party Cookies.

Certain features of my Site depend on Cookies to function. Cookie Law deems these Cookies to be "strictly necessary". These Cookies are shown in the table below. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser's settings as detailed below, but please be aware that mySite may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

Please consult my Cookie Policy for up-to-date details on the Site's current use of Cookies.

My site may in future use analytics services provided by Google Analytics. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling me to better understand how my is used. This, in turn, enables me to improve my site and the services offered through it.

The analytics service(s) used by my Site use(s) Cookies to gather the required information. You do not have to allow me to use these Cookies, however whilst my use of them does not pose any risk to your privacy or your safe use of my Site, it does enable me to continually improve My Site, making it a better and more useful experience for you.

Please consult my Cookie Policy for up-to-date details on the Site's current use of Cookies.

In addition to the controls that I provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

### 13. How Do I Contact You?

To contact me about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Sharon Louca):

Email address: Sharon Louca.

Telephone number: 01827 768430.

Postal address: The Mill Business Centre, Unit 22, Sir Robert Peel Mill, Mill Lane,

Fazeley, Tamworth B78 3QD

# 14. Changes to this Privacy Policy

I may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if I change my business in a way that affects personal data protection.

Any changes will be immediately posted on my Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of My Site following the alterations. I recommend that you check this page regularly to keep up-to-date. This Privacy Policy was last updated on 17<sup>th</sup> February 2021.