

Campden BRI Privacy Notice

We take your privacy very seriously. Please read this privacy notice carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities if you have a complaint.

1. Introduction

- 1.1. This Privacy Notice relates to our collection, use, disclosure, transfer and storing of your personal information when accessing our services, whether via our website, by phone, email or other correspondence, or in person.
- 1.2. This Privacy Notice explains the following:
 - what information we may collect about you;
 - how we will use information we collect about you;
 - when we may use your details to contact you;
 - whether we will disclose your details to anyone else;
 - your choices regarding the personal information you provide to us;

2. Key terms

Key terms	
We, us, our	Campden BRI Group companies
Personal data	Any information relating to an identified or identifiable individual
Personal uata	Any information relating to an identified or identifiable individual

3. What information does Campden BRI collect about me?

2.1 Automatic collection of information

- 2.2 If you do nothing during your visit to our website, but browse through the website or download information, our system (and those systems of our approved third party data processors) will automatically gather and store certain information about your visit. Please see our <u>Cookie Policy</u> or further details
- **2.3** This information is not used to identify you personally and is aggregated to help us improve our website, tell us the number of visitors to our site each day, identify the IP address of businesses and their location, but never of individuals. Depending upon the cookie settings you select, our web server may automatically collect and record the following information:
 - The visitor's IP address;
 - The name and release number of web browser software used;
 - The operating system used;
 - The screen dimensions of the visitor's computer;
 - Date and time the visitor accessed our site;
 - The address of the website that linked to us (referrer URL).
 - The address and title of the page being visited.

This information may also be passed to a third party for the purpose of lead generation and may be used to match business visitors to company and contact details that the third party has collected from other sources.

2.4 CCTV may be in operation at our sites for the purposes of prevention and detection of crime, safety, and good management. Signage is displayed in the relevant areas to notify you of CCTV usage.

2.5 Permission-based collection of information

- **2.6** Information may be collected as part of fulfilling service requests, completion of bookings for training courses, purchasing publications, registering for membership and registering for alerts.
- **2.7** We endeavour to collect information only with your knowledge and with your permission where necessary.
- **2.8** Depending on the area of the site you visit, method by which you communicate with us, or the service you access, the types of personal information that we collect may include your name, e-mail address, the name and address of the company you work for, your position within that company, telephone and other information necessary to fulfil your request.

4. How will Campden BRI use the information it collects about me?

- 3.1 We will use your personal information for a number of purposes including but not limited to the following:
 - providing our services, activities or online content and information about them;
 - dealing with your requests and enquiries, including where we have a commercial relationship in place;
 - supporting the growth and sustainability of our business;
 - providing you with the most user-friendly online navigation experience
 - preventing and detecting crime and maintaining your safety

This includes:

- monitoring, reviewing, measuring and analysing website utilisation;
- modifying, enhancing and improving the content of our website;
- responding to any enquiries you submit;
- processing transactions, e.g. reservation on a training course or the purchase of a publication;
- monitoring and improving our customer service efforts;
- marketing our services to existing and former customers and third parties;
- studying aggregated general usage habits and demographic information for our own marketing research purposes;
- recording and monitoring images via CCTV.

5. Marketing

- 5.1. We may use your personal data to send you updates (eg by email, text message, telephone, post or social media channels) about our services, including exclusive offers, promotions or new services.
- 5.2. We have a legitimate interest in using your personal data for marketing purposes (see above 'How will Campden BRI use the information it collects about me?'. This means we do not usually need your consent to send you marketing information. Where this is not the case, we will always ask for your consent.
- 5.3. In all cases, you have the right to opt out of receiving marketing communications at any time by:

- using the 'unsubscribe' link in emails; or
- updating your marketing preferences on the following link <u>https://www.campdenbri.co.uk/optln.php</u>
- 5.4. We may ask you to confirm or update your marketing preferences if you ask us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.
- 5.5. We will always treat your personal data with the utmost respect and never sell it to or share it with other organisations outside the Campden BRI Group for marketing purposes.

6.

Who we share your personal data with

- 4.1 We routinely share personal data with:
 - companies within the Campden BRI group;
 - third parties we use to help deliver our services to you, e.g. providers of our finance system, IT service providers including cloud service providers such as data storage platforms, shared service centres and financial institutions in connection with invoicing and payments;
 - other third parties we use to help promote our business, e.g. marketing agencies;

We only allow those organisations to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We ensure all outsourcing providers operate under service agreements that are consistent with our legal obligations.

We or the third parties mentioned above may occasionally also share personal data with:

- our external auditors, eg in relation to the audit of our accounts, in which case the recipient of the information will be bound by confidentiality obligations
- our and their professional advisors (such as lawyers and other advisors), in which case the recipient of the information will be bound by confidentiality obligations
- law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations
- other parties that have or may acquire control or ownership of our business (and our or their professional advisers) in connection with a significant corporate transaction or restructuring, including a merger, acquisition or asset sale or in the event of our insolvency—usually, information will be anonymised but this may not always be possible and the recipient of any of your personal data will be bound by confidentiality obligations

7. Where is personal data held?

8. Personal data may be held at our premises and those of our group companies, third party agencies, service providers, representatives and agents as described above (see 'Who we share your personal data with').

9. How long will Campden BRI keep my information?

5.1 We will not keep your personal data for longer than we need it for the purpose for which it was collected or as required by law.

10. Transferring your personal data abroad

We operate within the UK and EU and may transfer personal information to a country outside the EEA. In all such cases, we will take steps to ensure that personal data is only transferred in accordance with applicable data protection legislation.

11. How can I exercise my data protection rights?

6.1 You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal data
Rectification	The right to require us to correct any mistakes in your personal data
Erasure (also known as the right to be forgotten)	The right to require us to delete your personal data—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal data—in certain situations, eg if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object: —at any time to your personal data being processed for direct marketing (including profiling); —in certain other situations to our continued processing of your personal data, eg processing carried out for our legitimate interests unless we demonstrate compelling legitimate grounds for the processing which override your interests or for establishing, exercising or defending legal claims
Not to be subject to automated individual decision making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you
The right to withdraw consent	If you have provided us with a consent to use your personal data you have a right to withdraw that consent at any time You may withdraw consents by [insert details as relevant depending on consents] Withdrawing consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn

6.2 To exercise any of your rights contact us at <u>DPO@campdenbri.co.uk</u>. We may reasonably request copies of identification

12. Keeping your personal data secure

12.1. We have implemented appropriate technical and organisational measures to keep your personal data confidential and secure from unauthorised access, use and disclosure. We limit access to your personal data to those who have a genuine business need to access it. Those processing your personal data will do so only in an authorised manner and are subject to a duty of confidentiality. We regularly test our systems and are Cyber Essentials certified, which means we have in place recommended standards for information security.

13. Contacting Campden BRI

7.1 If you have any questions, comments or complaints about this policy or how we have processed your personal data please contact:

The Data Protection Officer **Campden BRI** Station Road, Chipping Campden Gloucestershire UK. GL55 6LD Tel: +44(0)1386 842000

Email: DPO@campdenbri.co.uk

7.2 If we are unable to fully resolve any issue to your satisfaction you have the right to contact the Information Commissioner's Office, whose contact details can be found at_<u>https://ico.org.uk/global/contact-us/</u>.