

## BPS Birmingham Privacy Policy



BPS Birmingham ("BPS", "us", "we" or "our") is committed to respecting your privacy and to complying with applicable data protection and privacy laws.

You can visit our websites without disclosing any personally identifiable information about yourself, although please note that we may use cookies and collect other non-personally identifiable information about your browsing activity. We collect IP addresses of visitors to our website, however we never use this information to identify individuals; it is used solely to calculate the number of unique visitors.

If you do submit personal information by using our services, giving us a business card or completing a web contact or registration form, for example, you can be assured that we will use your personal information only to support your continuing relationship with BPS Birmingham.

We have provided this Privacy Policy to help you understand how we collect, use and protect your information when you visit our websites and when you use our products and services.

We wish to help you make informed decisions, so please take a few moments to read the sections below and learn how we use your personal information.

### **Who to contact about our Privacy Policy**

Where any of your data is collected by BPS, we are the controller of this data. If we need to pass your data to another party for processing (e.g. payroll services or third party emailing systems) we will let you know that this is going to happen and you may withdraw consent at any time.

BPS Birmingham can be contacted about this Privacy Policy at our office at Cornwall Buildings, 45-51 Newhall Street, Birmingham, B3 3QR. You may also email [hello@bpsbirmingham.co.uk](mailto:hello@bpsbirmingham.co.uk) in regard to this Privacy Policy.

## **Personal Information Collection**

We collect and use your personal information only with your knowledge and consent and typically when you contact us and subsequently use our services, make applications to one of our schemes (e.g. awards, training, mentoring), attend an event, request service information, submit a job application, volunteer with us or when you respond to communications from us (such as questionnaires or surveys.)

The type of personal information we may collect could include, for example, your name and postal address, the organisation you work for, telephone number, email address, gender and photographs of you at our events/activities.

If you choose to provide us with personal information it will be used in support of the intended purposes stated at the time at which it was collected, and subject to any preferences indicated by you.

Please see the table at the end of this Privacy Policy for an overview of the record of the types of personal information we collect, use and store.

## **Non-personal Identifying Information**

We may also collect non-personally identifying information about your visit to our websites based on your browsing activities. This information may include the pages you browse and services viewed. This helps us to better manage and develop our sites, to provide you with a more enjoyable, customised service and experience in the future, and to help us develop and deliver better services tailored to your individual interests and needs.

From time to time, if you consented accordingly we may also store and use your information to contact you for market research and marketing purposes. We may contact you by email, phone or mail, depending on the consent and preferences given to us.

## **How will we use your information?**

We may use your information for a number of purposes which includes: delivering any services, reports or information requested by you; responding to complaints or account enquiries; administering debt recoveries; verifying your identity when required. Please see the table at the end of this Privacy Policy for a full record of the types of personal information we collect, use and store.

We may also undertake market and product analysis based on your use of our services and contact you with information about new developments, products, services and special offers by post, telephone and automated means such as mobile text message (SMS), email and the internet (subject to any preferences expressed by you.)

If you have consented to receive details of our services, events and training you can contact us at any time to have your details removed from lists used by us for any or all of those purposes or from lists maintained by our marketing team, to update your information or to otherwise tell us how you would like to receive information about our products and services - the choice is yours.

To update your marketing preferences please email [hello@bpsbirmingham.co.uk](mailto:hello@bpsbirmingham.co.uk).

## **When will we disclose your information to others?**

We may only disclose information about you and contact details to (i) any BPS partners or suppliers for the purposes and subject always to the terms of this Privacy Policy; (ii) in the event that we undergo reorganisation or are sold to a third party, in which case any personal information we hold about you may be transferred to that reorganised entity or third party for the purposes and subject to the terms of this Privacy Policy.

BPS Birmingham does not sell or pass your personal information to third parties (other than as set out in the paragraph above) unless you have given us permission or unless it is strictly necessary to deliver the services used by you and you are notified beforehand.

For example, we share your information with volunteers that run a scheme that you have applied to join in order to process it and fulfil the service (e.g. mentoring academy; Birmingham Young Professional of the Year).

BPS may also be obliged to disclose your personal information to meet any legal or regulatory requirements (for example to comply with a court order) or obligations in accordance with applicable law.

### **Social media, blogs, reviews**

Any social media posts or comments you send to us (on BPS Twitter channels, for instance) will be shared under the terms of the relevant social media platform (e.g. Twitter/LinkedIn) on which they are written and could be made public.

Other people, not us, control these platforms. We are not responsible for this kind of sharing. We recommend you should review the terms and conditions and privacy policies of the social media platforms you use. That way, you will understand how they will use your information, what information relating to you they will place in the public domain, and how you can stop them from doing so if you wish.

Any blog, review or other posts or comments you make about us or our services on any of our blogs, reviews or user community services will be shared with all other members of that service and the public at large. Any comments you make on these services and on social media in general must be not offensive, insulting or defamatory. You are responsible for ensuring that any comments you make comply with any relevant policy on acceptable use of those services.

### **Job applications, internships and placements**

In submitting a job application you should be aware we may store the information you provide us for up to one year after the application deadline. We will store your information and any materials related to your application, such as interview notes, for a period of 6 months following your application. This is to enable us to provide feedback following the recruitment process and field enquiries about the process.

We may contact you if other suitable vacancies arise using the information you have provided to us. You can change your mind and withdraw such consent at any time.

Should you wish us to provide you with a reference after this period you will need to inform us of this and how long you would like us to keep your data for.

### **How long do we keep your information for?**

To make sure we meet our legal data protection and privacy obligations, we only hold on to your information for as long as we need it for the purposes we acquired it for in the first place, or for additional purposes agreed with your consent

In most cases, this means we will keep your information for as long as you continue to use our services, and for a reasonable period of time afterwards if you stop doing so. After that we will delete it other than where we lawfully need to keep any data for audit or legal reasons. Please see a table that shows which data we store, why we store it and for how long at the end of this policy.

We shall keep data on our prospect database so that we may contact you about the services you have requested for no longer than three years after the last time you had contact with us, subject to an individual's right to unsubscribe or be forgotten at any time.

### **Access to your Information or Complaints**

You can write to us at any time to obtain details of the personal information we may hold about you. Please write to: [hello@bpsbirmingham.co.uk](mailto:hello@bpsbirmingham.co.uk).

You may request the following:

- Confirmation of whether, and where, we are processing your personal data
- Information about the purposes of the processing
- Information about the categories of recipients with whom the data may be shared
- Information about the period for which the data will be stored (or the criteria used to determine that period)

- Information about the existence of the rights to erasure, to rectification, to restriction of processing and to object to processing
- Information about the existence of the right to complain to the DPA
- Where the data were not collected from the data subjected
- Information about the existence of, and an explanation of the logic involved in, any automated processing that has a significant effect on you
- A copy of the personal information being processed

Many of the above points are addressed within this policy and in the appended table showing information by categories of contacts, however you may request them separately if you wish to enquire specifically about your information.

Please quote your name and organisation (where applicable) together with your telephone number and/or email address on any requests. We would be grateful if could clearly indicate what you would like to know or what information you want a copy of (this helps us to more readily locate your data.)

We will take all reasonable steps to confirm your identity before providing you with details of any personal information we may hold about you.

We will respond to all enquiries/subject access requests within 30 days. This may be extended to 90 days in exceptional circumstances for highly complex requests. You have the right to make as many access requests as you would like, however frequent and repeated requests may incur reasonable charges to cover the administrative time required. Should this arise, it will be discussed with you. You have the right to lodge a complaint with a supervisory authority. In the UK this is the Information Commissioners Office (ICO) and you can find out how to do this online here: <https://ico.org.uk/concerns/>

### **Information Security**

BPS recognises that its customers are increasingly concerned about how companies protect personal information from misuse and abuse and about privacy in general. BPS is constantly reviewing and enhancing its technical, physical and managerial procedures and rules to protect your personal data from unauthorised access, accidental loss and/or destruction.

BPS's website and internal systems on it are covered by HTTPS.

Please be aware that communications over the Internet, such as emails/webmails, are not secure unless they have been encrypted. Your communications may route through a number of countries before being delivered - this is the nature of the World Wide Web/Internet. BPS cannot accept responsibility for any unauthorised access or loss of personal information that is beyond our control.

Should we need to pass your information on to a third party, in order to deliver products and services, or for other purposes for which you have provided consent, we will ensure that the information is transferred securely and that the third party is aware of their obligations under our privacy policy. Third parties will be required to remove your information from their systems as soon as it is no longer needed for the purposes it was shared for (for example running of an event).

### **Data Storage and Security Systems**

BPS stores all personal data securely on either cloud storage systems or its own internal storage systems. All our cloud storage is kept in EU based or EU GDPR compliant data centres which are managed with sophisticated high level security systems. These storage services have their own data protection policies which we can provide you with on request. We choose storage providers with excellent security policies and systems to ensure minimal risk of data breaches and unauthorised access.

Our internal storage and communications systems are protected by high level, managed security systems, which are updated regularly.

Our IT infrastructure is managed by experts and is regularly reviewed to ensure security is constantly up to date.

### **Hard Copy Documents and Destruction of Data**

BPS only keeps information in hard copy where this is required, such as signed documentation (e.g. contracts), for funding bodies with hard copy evidence requirements or where there is a legal requirement to maintain original documents. All hard copy

documentation containing personal data is stored securely in locked cabinets which are only accessible by employees of BPS.

Once hard copy documentation is no longer required, it is disposed of securely by shredding and incineration.

### **Privacy Support**

BPS reserves the right to amend or modify this Privacy Policy at any time and in response to changes in applicable data protection and privacy legislation.

If we decide to change our Privacy Policy, we will post the changes on our website so you know what information we collect and how we use it. If at any point we decide to use personally identifiable information in a manner different from that stated at the time it was collected, we will tell you. You will have a choice as to whether or not we are able to use your information in this different manner.

If you have any enquiries about Ahead Partnership's privacy policy or practices, please write to: [hello@bpsbirmingham.co.uk](mailto:hello@bpsbirmingham.co.uk). This mailbox is monitored by several employees of Ahead Partnership.

We do not have an official Data Protection Officer as this is not a requirement for our organisation. However we do have a Privacy Officer overseeing data protection compliance. Our current Privacy Officer is Deanna Page, who can be contacted directly at [Deanna@bpsbirmingham.co.uk](mailto:Deanna@bpsbirmingham.co.uk).

### **Monitoring and or recording of all your communications**

Monitoring or recording of your calls, emails, text messages and other communications may take place in accordance with UK law, and in particular for business purposes, such as for quality control and training, to keep a record of contact between you and our organisation for effective delivery of products, services and contracts and to easily field enquiries, to prevent unauthorised use of BPS's websites, to ensure effective systems operation and in order to prevent or detect crime.

## What personal information we collect, how long we store it for and why we collect this information (at a glance):

If you are a:	Legal basis for processing data:	Data we may collect with your consent:	How long we store/use this data:	Why we collect this information:	Third parties data may be shared with and why:
MEMBER	<ul style="list-style-type: none"> <li>. Performance of contract services</li> <li>. Consent through contract to promote activities available to member's.</li> <li>. legal obligations</li> </ul>	<ul style="list-style-type: none"> <li>. Full name</li> <li>. Job Title</li> <li>. Employer</li> <li>. Email (business)</li> <li>. Email (personal)</li> <li>. Telephone number (business)</li> <li>. Telephone number (personal)</li> <li>. Contact address</li> <li>. Photographic consent</li> <li>. Record of engagement with BPS services</li> <li>. Social media Handles</li> <li>. Employers Website</li> <li>. Dietary Requirements</li> <li>. DOB</li> </ul>	<ul style="list-style-type: none"> <li>. Duration of membership plus 12 months after expiration.</li> <li>. Financial records relating to membership kept for six years after purchase.</li> </ul>	<ul style="list-style-type: none"> <li>. To deliver a quality of membership services</li> <li>. To analyse and report on volunteer feedback (anonymously) from our events and activities</li> <li>. To resolve to all requests/enquiries</li> <li>. To effectively help with our customer service</li> </ul>	<ul style="list-style-type: none"> <li>. Action Starter (contracted data processor for membership services)</li> <li>. Committee members involved in supporting membership services.</li> <li>. All BPS employees to maintain business function.</li> <li>. Google drive Storage. Software providers: to store information</li> <li>. Mail chimp for administering communications in relation to services</li> <li>. Other business contacts; if requested by you (e.g. for networking introductions)</li> <li>. Eden IT Services as part of our IT support services</li> <li>. Xero &amp; Inform Accounting - financial administration and accountancy services</li> </ul>
EVENT ATTENDEE	<ul style="list-style-type: none"> <li>. Performance of contract services</li> <li>. Consent to promote/market through opt-in.</li> <li>. Legitimate business interest</li> <li>. legal obligations</li> </ul>	<ul style="list-style-type: none"> <li>. Full name</li> <li>. Job Title</li> <li>. Employer</li> <li>. Email (business)</li> <li>. Email (personal)</li> <li>. Telephone number (business)</li> <li>. Telephone number (personal)</li> <li>. Contact address</li> <li>. Notes on our communications</li> <li>. Record of engagement with BPS services</li> <li>. Dietary Requirements</li> </ul>	<ul style="list-style-type: none"> <li>. Members: as per membership rules above.</li> <li>. Non-Members: 12 months after last event attendance.</li> <li>. financial records relating to event tickets retained for six years after transaction date</li> </ul>	<ul style="list-style-type: none"> <li>. To effectively manage the event</li> <li>. To contact you with information about the event</li> <li>. To send event feedback forms</li> <li>. To make sure all health and Safety is</li> </ul>	<ul style="list-style-type: none"> <li>. Google Cloud storage/ software providers: to store information</li> <li>. Action Starter (mandatory website support)</li> <li>. Delegate lists with other event attendees</li> <li>. All BPS employees to maintain business function.</li> <li>. Action Starter (contracted data processor for membership services)</li> <li>. Other business</li> </ul>

				adhered to, i.e. Dietary requirements and venue requirements	contacts; if requested by you (e.g. for networking introductions) . Eden IT Services as part of our IT support services . Xero & Inform Accounting - financial administration and accountancy services
APPLICANTS TO OUR SCHEMES (e.g. Mentoring, BYPY, Leadership Development Programme, Trainee Professional, Professional Services Week)	. Consent through voluntary application to participate in schemes. . legitimate business interest	. Full name . Job Title . Employer . Employment History . Education History . Email (business) . Email (personal) . Telephone number (business) . Telephone number (personal) . Contact address . Notes on our communications . Photographs at events . Opinions from feedback forms . Contractual and legal documentation . Social Media Handles	. For successful applicants: 12 months after the completion of the scheme/ programme . Unsuccessful applicants: 6 months after completion of processing/ evaluation for specific scheme.  Note: For winners of awards/ jobs through BPS Schemes such as Trainee Professional and Birmingham Young Professional of the Year, your name will be publicly available information and unable to be deleted from this record.	. To administer the schemes and provide the required services . To assess suitability for each scheme . To review feedback and drive service improvement . To promote success of schemes through PR/ Comms activity.	. Cloud storage/ software providers; to store information . Other business contacts; if requested by you (e.g. for networking introductions) . Committee members/ volunteers directly involved in administering the specific scheme. . Other volunteers and suppliers involved in running the scheme . Eden IT Services as part of our IT support services . Xero & Inform Accounting - financial administration and accountancy services
EMPLOYEE	. contract performance . legal obligations	. Full name . DOB . Home address . Job Title . Additional employers . Email (business) . Telephone number (business) . Telephone number (personal) . Organisation address . Home address . Employment History . Educational	. six years after termination of employment with us	. Meet our contractual obligations to you as an employer . To deliver our contracts with funders, HMRC, Business or government stakeholders . To ensure we meet	. Cloud storage/ software providers; to store information . Eden IT Services as part of our IT support services . Xero & Inform Accounting - financial administration and accountancy services

		<p>Attainment/Qualifications</p> <ul style="list-style-type: none"> <li>· Unspent Criminal Convictions</li> <li>· Photo ID (e.g. passport)</li> <li>· National Insurance Number</li> <li>· Reference Contact Details</li> <li>· Notes on our communications</li> </ul>		<p>appropriate H&amp;S / safeguarding legislations</p> <ul style="list-style-type: none"> <li>· To improve our staff experience</li> <li>· To comply with policies and procedures and employment legislation</li> <li>· To be able to confirm details for your employment, i.e. a response to a reference request</li> </ul>	
<p>JOB APPLICANT</p>	<ul style="list-style-type: none"> <li>· Legitimate business interest</li> <li>· consent</li> </ul>	<ul style="list-style-type: none"> <li>· Full name</li> <li>· DOB</li> <li>· Job Title</li> <li>· Employer</li> <li>· Email (business)</li> <li>· Telephone number (business)</li> <li>· Telephone number (personal)</li> <li>· Contact address</li> <li>· Notes on our communications</li> <li>· Contractual and legal documentation</li> <li>· Employment History</li> </ul>	<ul style="list-style-type: none"> <li>· one year after application deadline</li> </ul>	<ul style="list-style-type: none"> <li>· To safely deliver our contract of employment with you including payment of salary</li> <li>· To safely deliver our contracts with funders, HMRC, Business or government stakeholders</li> <li>· To ensure we meet appropriate safeguarding legislations</li> <li>· To improve our staff experience</li> <li>· To comply with policies and procedures and employment legislation</li> <li>· To be able to confirm details for your</li> </ul>	<ul style="list-style-type: none"> <li>· Cloud storage/ software providers; to store information</li> <li>· Other business contacts; if requested by you (e.g. for networking introductions)</li> <li>· Eden IT Services as part of our IT support services</li> <li>· Xero &amp; Inform Accounting - financial administration and accountancy services</li> </ul>

				employment, i.e. a response to a reference request	
SPONSOR	<ul style="list-style-type: none"> <li>Performance of contracts</li> <li>legitimate business interest</li> </ul>	<ul style="list-style-type: none"> <li>Full name</li> <li>Job Title</li> <li>Employer</li> <li>Email (business)</li> <li>Email (personal)</li> <li>Telephone number (business)</li> <li>Telephone number (personal)</li> <li>Contact address</li> <li>Notes on our communications</li> <li>Contractual and legal documentation</li> <li>Financial details</li> </ul>	<ul style="list-style-type: none"> <li>Six years after termination of your services with us.</li> </ul>	<ul style="list-style-type: none"> <li>To be able to comply with our contractual agreements</li> <li>To make sure all sponsorship benefits are adhered too effectively</li> <li>To maintain effective communication/ customer service</li> </ul>	<ul style="list-style-type: none"> <li>Cloud storage/ software providers; to store information</li> <li>Other business contacts; if requested by you (e.g. for networking introductions)</li> <li>Eden IT Services as part of our IT support services</li> </ul>
SUPPLIER	<ul style="list-style-type: none"> <li>Performance of contract</li> <li>legal obligations</li> </ul>	<ul style="list-style-type: none"> <li>Name</li> <li>Business</li> <li>Email (business)</li> <li>Financial details</li> <li>Telephone numbers</li> <li>Business Address</li> </ul>	<ul style="list-style-type: none"> <li>Six years after termination of your services with us.</li> </ul>	<ul style="list-style-type: none"> <li>To meet our contractual obligations</li> <li>To comply financial administration legal requirements</li> <li>To ensure compliance with health &amp; safety legislation and/ or other legislation pertaining to the contract performance</li> </ul>	<ul style="list-style-type: none"> <li>Xero - financial administration and accounting platform</li> <li>Eden IT Services as part of our IT support services</li> </ul>
BUSINESS ENQUIRIES	<ul style="list-style-type: none"> <li>legitimate business interest</li> <li>consent</li> </ul>	<ul style="list-style-type: none"> <li>Name</li> <li>Email address</li> <li>Notes on our communication</li> <li>Employer</li> <li>Telephone number (business)</li> <li>social media handles</li> </ul>	<ul style="list-style-type: none"> <li>12 months following initial enquiry if no further consent given.</li> <li>5 years after initial enquiry with consent to receive further information</li> </ul>	<ul style="list-style-type: none"> <li>To be able to deliver effective customer service</li> <li>To maintain effective communication about BPS Services</li> </ul>	<ul style="list-style-type: none"> <li>Cloud storage/ software providers; to store information</li> <li>Other business contacts; if requested by you (e.g. for networking introductions)</li> <li>Eden IT Services as part of our IT support services</li> </ul>
BOARD DIRECTORS	<ul style="list-style-type: none"> <li>Legal obligations.</li> <li>legitimate business interest</li> </ul>	<ul style="list-style-type: none"> <li>Name</li> <li>DOB</li> <li>Contact Address</li> <li>Criminal Convictions</li> <li>Email address</li> <li>Telephone number</li> </ul>	<ul style="list-style-type: none"> <li>3 years after termination of directorship</li> </ul>	<ul style="list-style-type: none"> <li>Compliance with legal obligations of a Director</li> <li>Performance</li> </ul>	<ul style="list-style-type: none"> <li>Cloud storage/ software providers; to store information</li> <li>Other business contacts; if requested by you (e.g. for networking</li> </ul>

		<ul style="list-style-type: none"> <li>. profession</li> <li>. Employer</li> </ul>		<ul style="list-style-type: none"> <li>of duties to the Company as a Director</li> <li>. Assist in the enhancement of business performance</li> </ul>	<ul style="list-style-type: none"> <li>introductions)</li> <li>. Eden IT Services as part of our IT support services</li> </ul>
MEMBERSHIP MANAGERS	<ul style="list-style-type: none"> <li>. Performance of contract services</li> <li>. legitimate business interest</li> </ul>	<ul style="list-style-type: none"> <li>. Name</li> <li>. DOB</li> <li>. Contact Address</li> <li>. Email address</li> <li>. Telephone number</li> <li>. Employer</li> </ul>	<ul style="list-style-type: none"> <li>. Duration of membership plus 12 months after expiration.</li> <li>. Financial records relating to membership kept for six years after purchase.</li> </ul>	<ul style="list-style-type: none"> <li>. To maintain engagement and performance of services for corporate members</li> <li>. To promote membership services and improve customer experience.</li> </ul>	<ul style="list-style-type: none"> <li>. Action Starter (mandatory website support)</li> <li>. Committee members to maintain an effective membership experience</li> <li>. All BPS employees to maintain business function</li> <li>. Google drive Storage. Software providers: to store information</li> <li>. Xero - financial administration and accounting platform</li> <li>. Eden IT Services as part of our IT support services</li> </ul>