

Privacy Policy

This policy does not include our Cookie Policy or our Employee Privacy Policy which are separate documents.

1. Introduction

- 1.1 We, South Wales Chamber of Commerce (SWCC), are committed to safeguarding the privacy of our website visitors, members and service users.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of our website visitors, members and service users; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 In this policy, "we", "us" and "our" refer to South Wales Chamber of Commerce. For more information about us, see Section 13.

2. Credit

- 2.1 This document was created using a template from SEQ Legal. (<https://seqlegal.com>).

3. How we use your personal data

- 3.1 In this Section 3 we have set out:
 - (a) the general categories of personal data that we may process;
 - (b) the purposes for which we may process personal data; and
 - (c) the legal bases of the processing.
- 3.2 We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is Google Analytics. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.
- 3.3 We may process your website user account data ("**account data**") which is created when you use one of our website forms to contact us. The account data may include your name and email address. The source of the account data is you or your employer. The account data may be processed for communicating with you, the general purposes of operating our website, providing our services and ensuring the security of our website and services. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business. For more details of our aims in processing your data please see our primary objects [here](#).

- 3.4 We may process the information included in your membership profile on our website ("**membership data**"). The membership data may include your business name and address (which may be your personal name and address if you are a sole trader), your name, email and phone number as the business contact. Your membership data may be processed for the purposes of enabling and monitoring your use of our website and services, including our special membership services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is the fulfilment of our contractual obligations to your business as a member.
- 3.5 We may process your personal data that are provided in the course of the use of our services ("**service data**"). The service data may include bank details, contact name, postal and email addresses which may be personal if your business is run from your home. The source of the service data is you. The service data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal bases for this processing are our contractual obligations to you where you have purchased a service from us or intend to do so, our legal obligations where the law requires us to keep data for a given period, and our legitimate interests, namely the proper administration of our website and business where services are freely available. For more details of our aims in processing your data please see our primary objects [here](#)
- 3.6 We may process information that you post for publication on our website or through our services ("**publication data**"). The publication data may be processed for the purposes of enabling such publication and administering our website and services. The legal basis for this processing is our contractual obligations to you as a member if you are posting in the members' dashboard area, or our legitimate interests, namely the proper administration of our website and business, where posting is open. For more details of our aims in processing your data please see our primary objects [here](#)
- 3.7 We may process information contained in any enquiry you submit to us regarding goods and/or services ("**enquiry data**"). The enquiry data may be processed for the purposes of offering, marketing and selling relevant goods and/or services to you. The legal basis for this processing is consent.
- 3.8 We may process information relating to transactions, including purchases of goods and services, that you enter into with us and/or through our website ("**transaction data**"). The transaction data may include your contact details, your card details (although this information will not be retained) and the transaction details. The transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions. The legal bases for this processing are legal obligation where we are obliged to keep financial records for given periods of time under the law (eg. 7 years for tax purposes); the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract; and our legitimate interests, namely our interest in the proper administration of our website and business. For more details of our aims in processing your data please see our primary objects [here](#).

- 3.9 We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("**notification data**"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal bases for this processing are our contractual obligations to members where the notifications or newsletters are part of our membership package, or the promotion of our legitimate interest, namely our interest in promoting Chamber events and services. For more details of our aims in processing your data please see our primary objects [here](#)
- 3.10 We may process information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include the communication content and metadata (such as the date, author, general subject category) associated with the communication. Our website will generate metadata associated with communications made using the website contact forms (such as IP address and date). The correspondence data may be processed for the purposes of communicating with you, record-keeping and, where communications are received via website forms, online security. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business. For more details of our aims in processing your data please see our primary objects [here](#)
- 3.11 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 3.12 We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- 3.13 In addition to the specific purposes for which we may process your personal data set out in this Section 3, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.
- 3.14 Please do not supply any other person's personal data to us, unless we prompt you to do so.

4. Providing your personal data to others

- 4.1 The Chamber is part of a network of 53 Chambers of Commerce across the UK accredited by the British Chambers of Commerce (BCC). One purpose of the Chamber is to "promote support or oppose any legislation or policies". This objective is stated in the Chamber's 'Articles of Association' (see clause (d) of the Chamber's Principal Objects). We will provide BCC with your company's email address in order for BCC to conduct research into the impact of policies on your business.

BCC will not contact your business for any other purpose than to notify you of an opportunity to respond to a national policy survey. Each year, BCC conducts around five surveys which directly help us develop and shape Government policy across a range of areas, including business taxation, international trade, and employment. The data from these surveys are completely anonymised and aggregated so that individual responses cannot be identified. The anonymised data are then presented in closed briefings with stakeholders across UK Government, and shared publicly through BCC's press team.

The purpose of carrying out the surveys is to produce reports, which BCC and the Chambers can then use in their activities in promoting and protecting the interests of UK businesses. There is never any marketing or commercial purpose to the surveys, and BCC does not carry out surveys on behalf of any third party.

You can contact us if you do not wish to be contacted by BCC, and you will have the opportunity to unsubscribe from BCC's research mailing list at any point.

- 4.2 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- 4.3 We may disclose the contact name and business email address (which may also be a personal email address) or business card of individual members to other member businesses where we feel this will benefit their business, as part of our legitimate interests, namely the furtherance of the interests of our members. For more details of our aims as an organisation please see our primary objects [here](#)
- 4.4 Financial transactions relating to our website and services are handled by our payment services provider, Sage Pay. We will share transaction data with our payment services provider only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. You can find information about the payment services provider's privacy policies and practices at <https://www.sagepay.co.uk/policies/privacy-policy>.
- 4.5 We may disclose personal business contact details to our communications contractor for the purpose of enabling them to forward newsletters, SWCC marketing and other information about our services. This contractor will act as a data processor on SWCC's behalf in relation to information supplied by us. They will only process personal data according to our documented instructions which will include that personal data will be used as set out in Section 3 above.
- 4.6 We may disclose personal contact details to our training providers for the purpose of enabling them to properly run our courses. These contractors will act as data processors on SWCC's behalf in relation to the information that we supply. They will only process personal data according to our documented instructions which will include that personal data will be used as set out in Section 3 above.

- 4.7 We may disclose personal business contact details to our property management contractor for the purpose of enabling them to properly manage our properties. This contractor will act as a data processor on SWCC's behalf in relation to information supplied by us. They will only process personal data according to our documented instructions which will include that personal data will be used as set out in Section 3 above.
- 4.8 We may disclose personal business contact details to our international trade documentation contractor for the purpose of producing the required documents. This contractor will act as a data processor on SWCC's behalf in relation to information supplied by us. They will only process personal data according to our documented instructions which will include that personal data will be used as set out in Section 3 above.
- 4.9 In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

5. International transfers of your personal data

- 5.1 In this Section 5, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA).
- 5.2 The British Chambers of Commerce, Welsh Government, UK Government and Overseas Embassies have a variety of overseas contacts that from time to time we may connect members to, for instance in relation to certificates of origin. We will only pass on personal information pertinent to their company or business interests.
- 5.3 You acknowledge that personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

6. Retaining and deleting personal data

- 6.1 This Section 6 sets out our data retention policy and procedures, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 6.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 6.3 We will retain your personal data as follows:
- (a) Website and services usage data (see clause 3.2 above) will be retained indefinitely.
 - (b) Website related account data (see clause 3.3 above, please note that this is not membership account data which is dealt with in sub clause (d) below)

will be retained indefinitely unless a delete request is received, in which case it will be deleted within a maximum period of 30 days.

- (c) Members' personal business contact data (see clause 3.4 above) will be retained for a maximum period of 30 days following membership cancellation unless consent is given for us to send marketing information after the membership has been cancelled.
- (d) Membership account data (see clause 3.4 above) will be retained for a maximum period of 4 months following membership expiry (ie. lapsed membership).
- (e) Export hard copy document data (see clause 3.5 above) will be retained indefinitely, electronic ATR and EUR1 certificates will be kept for a maximum period of 3 years and certificates of origin 2 years following the date of document issue.
- (f) Course trainee data (see clause 3.5 above) will be retained for a maximum period of 2 years following the date of the training unless there is a legal requirement for the data to be kept longer (this sometimes happens with government sponsored training).
- (g) Publication data (see clause 3.6 above) will be retained for a maximum period of 4 months following the date of publication.
- (h) Enquiry data (see clause 3.7 above) will be retained for a maximum period of 3 years following the date of the enquiry.
- (i) Transaction data (see clause 3.8 above) will be retained for a minimum period of 7 financial years following the date of the transaction, and for a maximum period of 10 years following the date of the transaction.
- (j) Notification data (see clause 3.9 above) will be retained for a maximum period of 1 month following the date of the cancellation/opt-out.

For more information, please see our [Document Retention and Storage Policy](#)

6.4 In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the following criteria:

- (a) the period of retention of correspondence data (see clause 3.10 above) will be determined based on the nature and content of the correspondence.

6.5 Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

7. Amendments

- 7.1 We may update this policy from time to time by publishing a new version on our website.
- 7.2 You should check this page occasionally to ensure you are happy with any changes to this policy.
- 7.3 We may notify you of changes to this policy by email or by newsletter.

8. Your rights

- 8.1 In this Section 8, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.
- 8.2 Your principal rights under data protection law are:
 - (a) the right to access;
 - (b) the right to rectification;
 - (c) the right to erasure;
 - (d) the right to restrict processing;
 - (e) the right to object to processing;
 - (f) the right to data portability;
 - (g) the right to complain to a supervisory authority; and
 - (h) the right to withdraw consent.
- 8.3 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee. You can access your personal data when logged into our website by using the Account Settings feature and via the "Update your Member Profile" feature.
- 8.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.
- 8.5 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is

for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

- 8.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.
- 8.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.
- 8.8 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.
- 8.9 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.
- 8.10 To the extent that the legal basis for our processing of your personal data is:
- (a) consent; or
 - (b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract,

and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

- 8.11 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory

authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

- 8.12 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.
- 8.13 You may exercise any of your rights in relation to your personal data by written notice to us via our online contact form, by email, or by post; or verbally in person or by telephone. We will need proof of your identity, unless you are personally known to staff, if you require access to your personal information.

9. Our details

- 9.1 This website is owned by the South Wales Chamber of Commerce and operated by Savage & Gray Design Ltd.
- 9.2 We are registered in England and Wales under registration number 01687863, and our registered office is at Finance Dept, Orion Suite, Enterprise Way, Newport, Gwent, NP20 2AQ.
- 9.3 Our principal place of business is at Orion Suite, Enterprise Way, Newport, Gwent, NP20 2AQ.
- 9.4 You can contact us:
- (a) by post, to the postal address given above;
 - (b) using our website contact form;
 - (c) by email at: info@southwaleschamber.co.uk; or
 - (d) by telephone, on 01633 254041

10. Complaints

- 10.1 Complaints should be addressed to the Chief Executive Officer, contact details are: info@southwaleschamber.co.uk.