

## **Be the Business - Privacy Policy**

The Productivity Group, trading as Be the Business (“Us”, “We”, “Our”), is a charitable company limited by guarantee with registered charity number 1173660. Our registered address is

We are committed to protecting your privacy and will only use the information that we collect about you lawfully in accordance with data protection legislation. This policy is intended to give you an understanding of how and why we use the information you provide to us both online (our website is located at <https://www.bethebusiness.com/> (the “**Website**”)) and otherwise.

Because we want to demonstrate our commitment to your privacy, this Privacy Policy notifies you of:

**What information do we collect about you?**

**How will we use the information about you?**

**Marketing Communications**

**Our Legal Basis for processing data**

**Will we share this information with others?**

**How do we protect the security of personal data?**

**How long do we keep your data for?**

**Your privacy rights**

**How will we let you know of changes to our privacy policy?**

**How to contact us**

**Cookies Notice**

**Please read this policy carefully to understand how we will collect, use and store your data.**

Questions regarding this statement should be directed to The Productivity Group by sending an email to [enquires@bethebusiness.com](mailto:enquires@bethebusiness.com). Please reference this Privacy Policy in your subject line.

### **1. What information do we collect about you?**

1.1 We collect personal data about you for a number of reasons, including communicating with you, responding to requests for information, and to provide you with access to our resources (including our tool Benchmark your Business) and events.

The personal data we collect can include:

- (a) your full name;
- (b) job title
- (c) postal address;
- (d) telephone number(s);
- (e) email address;
- (f) records of your correspondence with us;
- (g) your connection to the charity;
- (h) information you may enter onto the Website; and

- (i) other information you share with us.
- 1.2 On occasion we also collect sensitive personal data about individuals, for example, health information. We will normally only record this data where we have your explicit consent, unless we are permitted to do so in other circumstances under data protection law. For example, we may make a record that a person has particular access requirements to ensure he or she may attend an event.
- 1.3 We also collect information about the use of our website using cookies (see the Cookies section of this policy for more information).
- 1.4 There is also information about your computer hardware and software that is automatically collected by us. This information can include: your IP address (the unique identifying number of a computer), the browser you use, for example Internet Explorer, Firefox etc., domain names, access times and referring Website addresses. We use this information for the operation of the service, to maintain and improve the quality of the service, and to provide general statistics regarding use of the Website.

## 2. **How will we use the information about you?**

We will process your data for the following reasons:

- a) Deliver services, literature and/or other materials and information you have requested from us;
- b) To provide you with access to our resources, including the Benchmark your Business tool;
- c) To send you updates about our work, along with information future programmes and events.
- d) For our own internal administrative purposes and keep a record of your relationship with us;
- e) To manage your communication preferences;
- f) To conduct surveys, research and gather feedback;
- g) To produce reports and studies based upon our activities (only anonymised data to be included in the publication);
- h) To comply with applicable laws and regulations, and requests from statutory agencies.

## 3. **Marketing Communications**

3.1 We would love to keep you up to date with details about our movement, including events, resources and insights, and we will only do so where you have agreed to receive this information. We send the following types of marketing material:

- Updates about our work and programmes including newsletters and other publications about our work and campaigns;

- Invitations to participate in Be the Business events, conferences and programmes;
  - Information from our partner organisations, including details about their respective programmes and events;
  - Information about additional tools and resources which we think you might find interesting;
- 3.2 You can opt-out or update your communication preferences at any time by using the details in the “Contact us” section below. Any electronic communications will have a link to unsubscribe from future electronic communications, so you can manage your own consent.
- 3.3 If you tell us you do not wish to receive marketing communications, you may still receive administrative communications, for example confirming your attendance at events.

#### 4. **Our Legal Basis for processing data**

- 4.1 Organisations that collect and use personal data must have a lawful basis for doing so under data protection law and we are required to let you know the lawful basis on which we rely to process your personal data. We rely upon the following lawful bases:
- Obtaining your consent to use your data for a particular purpose (for example to send you direct marketing by e-mail or to collect sensitive personal data);
  - Where the use of the data is in our “legitimate interests” (see below for more information);
  - Where we need to process your data in order to perform our obligations under a contract that we have entered into with you (for example to enrol you in an event or provide you with access to resources); and
  - To process data where we are under a legal obligation to do so.
- 4.2 Personal data may be legally collected and used if it is necessary for a legitimate interest of the organisation using the data, as long as its use is fair and does not adversely impact the rights of the individual concerned. When we use your personal information, we will always consider if it is fair and balanced to do so and if it is within your reasonable expectations. We will balance your rights and our legitimate interests to ensure that we use your personal information in ways that are not unduly intrusive or unfair. Our legitimate interests include:
- *Charity Governance*, including delivery of our charitable purposes, statutory and financial reporting and other regulatory compliance purposes;
  - *Administration and operational management*, including responding to solicited enquires, providing information that you have requested, research, events management, the administration of our resources and tools.
  - *Liaising with third parties*, including working with partner organisations to develop new programmes and resources which further our charitable purposes.

4.3 If you would like more information on our uses of legitimate interests or to change our use of your personal data in this manner, please get in touch with us using the details in the “Contact us” section below.

**5. Will we share this information with others?**

5.1 We do not share, sell or rent your information to third parties for marketing purposes. We will not otherwise disclose your personal information unless required to do so by a regulatory agency or law.

5.2 We may allow our staff, consultants and/or external providers (data processors) acting on our behalf to access and use your information for the purposes for which you have provided to us (e.g. to analyse data and to process payments). We only provide them with the information they need to deliver the relevant service, and ensure that we take steps to ensure that they process personal data in a secure manner.

**6. How do we protect the security of personal data?**

6.1 We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

6.2 While we will use all reasonable efforts to safeguard your personal data, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data that are transferred via the internet. If you have any particular concerns about your information, please contact us.

7. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

7.1 The information we collect from you may be transferred to and processed and/or stored at a destination outside the European Economic Area (“EEA”). If we send your personal data outside the EEA we will take reasonable steps to ensure that the recipient implements appropriate measures to protect your information.

**8. How long do we keep your data for?**

8.1 We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

8.2 In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you no longer have a relationship with us, we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

8.3 If you request to receive no further contact from us, we will keep some basic information about you on our suppression list in order to avoid sending you unwanted materials in the future.

## 9. **Your privacy rights**

9.1 You have a number of rights under data protection legislation. These include:

(a) Right of access

You have the right to know what information we hold about you and to ask, in writing, to see your records. We will provide you with details of the records we hold as soon as possible and at latest within one month, unless the request is complex. We may require proof of identity before we are able to release the data. Please use the details in the "Contact us" section below if you would like to exercise this right.

(b) Right to be informed

You have the right to be informed how your personal data will be used. This policy as well as any additional information or notice that is provided to you either at the time you provided your details, or otherwise, is intended to provide you with this information.

(c) Right to withdraw consent

Where we process your data on the basis of your consent (for example, to send you marketing texts or e-mails) you can withdraw that consent at any time. To do this, or to discuss this right further with us, please contact us using the details in the "Contact us" section below.

(d) Right to object

You also have a right to object to us processing data where we are relying on it being within our legitimate interests to do so (for example, to send you direct marketing by post). To do this, or to discuss this right further with us, please contact us using the details in the "Contact us" section below.

(e) Right to restrict processing

In certain situations you have the right to ask for processing of your personal data to be restricted because there is some disagreement about its accuracy or legitimate usage.

(f) Right of erasure

In some cases, you have the right to be forgotten (i.e. to have your personal data deleted from our database). Where you have requested that we do not send you marketing materials we will need to keep some limited information in order to ensure that you are not contacted in the future.

(g) Right of rectification

If you believe our records are inaccurate you have the right to ask for those records concerning you to be updated. To update your records please email us at [enquires@bethebusiness.com](mailto:enquires@bethebusiness.com).

(h) Right to data portability

Where we are processing your personal data because you have given us your consent to do so, you have the right to request that the data is transferred from one service provider to another.

10. **Complaints**

10.1 If you are unhappy with the way in which we have handled your personal please contact us using the details below. You are also entitled to make a complaint to the Information Commissioner's Office - <https://ico.org.uk/>.

11. **How will we let you know of changes to our privacy policy?**

11.1 We may update this policy from time to time without notice to you, so please check it regularly. We will however aim to bring any significant changes to your attention. The privacy policy was last updated in March 2018.

12. **How to contact us**

12.1 Please contact us if you have any questions about our privacy policy or information we hold about you by e-mailing [enquiries@bethebusiness.com](mailto:enquiries@bethebusiness.com).

## Cookies Notice

This Cookie Notice explains how we use cookies and other tracking technologies through our website <https://www.bethebusiness.com/> (the “Website”).

This Cookies Notice is to be read alongside our Privacy Policy which explains how we use personal information. If you do not accept our use of cookies please disable them following our guidance below.

### What are web cookies?

Web cookies are small files that are placed on your computer or mobile device by a website when you visit it. They contain details of your browsing history on that website and distinguish you from other users. Cookies send data back to the originating website on each subsequent visit or allow another website to recognise the cookie. Cookies are useful because they allow a website to recognise a user’s device and, for instance, remember your preferences and generally improve your online user experience. Like most websites, we use cookies.

Although this Cookies Notice refers to the general term “cookie”, which is the main method used by this website to store information, the browser’s local storage space is also used for the same purpose and we may use other tracking technologies through this website such as web beacons. As a result, the information included in this Cookie Policy is likewise applicable to all such tracking technologies that we use.

You can find out more about cookies at [www.allaboutcookies.org](http://www.allaboutcookies.org).

### Why do we use cookies?

- To **let you do things on our website** – for example, cookies enable you to log in to secure areas of our website.
- To collect **anonymous statistics** – the information collected by cookies enables us to improve the website through usage figures and patterns. For example, it is really useful to see which pages of the website – and therefore which of our services – are the most popular and how users are interacting with them.
- To **improve your experience of our website** – for example, to prevent you having to re-enter details when you have already done so, or by ensuring that users can find what they are looking for easily.
- **Measuring how cost-effective our advertising is** – as a non-profit organisation, we need to watch our advertising spend carefully. Cookies are used to help us see how many people who click our adverts go on to do something further and to help make advertising content more relevant to your interests.

The table below provides more information about the cookies and other tracking technologies we use and why.

<b>Name of cookie</b>	<b>Owner</b>	<b>Purpose of the cookie</b>	<b>Duration</b>
firstname	be the business	Stores user's firstname when they're logged in. Used in main menu	30 days
region	be the business	Stores user's region when they're logged in. Used for fetching relevant related articles	30 days
PHPSESSID	be the business	For tracking user sessions	Browser session
cookiewarning	be the business	Set when the user has seen the cooking warning popup, to prevent it appearing on every page	30 days
_ga	Google Analytics	Traffic analytics	2 years
_gat	Google Analytics	Traffic analytics	1 day
_gid	Google Analytics	Traffic analytics	2 days

### **Website cookie acceptance**

By the accept tab when you visited the website you have consented to our use of cookies as updated from time to time. In particular, you consent to cookies being stored on your computer and/or mobile device (unless rejected or disabled by your browser).

### **Updating our Cookie Notice**

We may update our use of cookies from time to time and consequently we may update this Cookies Notice. We therefore recommend that you check this Cookies Notice regularly.