

**Privacy Notice:**  
**Members, mailing list subscribers and event attendees**



**Introduction**

Highland Business Women Limited, a company registered in Scotland with number SC534715 and its registered office at 4th Floor Metropolitan House, 31-33 High Street, Inverness, United Kingdom, IV1 1HT ("HBW") is the controller of your personal information. We respect your privacy and are committed to protecting it.

Personal information means any information about you from which you can be identified, but it does not include information where your identity has been removed (anonymous data).

As the controller of personal information, we are responsible for how that data is managed. This Notice sets out how HBW may collect, use and share information and describes:

- Principles of data protection;
- What information we collect about you;
- Our responsibilities to you;
- How we may use and share the information we collect;
- Whether information has to be provided by you;
- Legal grounds for using personal information;
- The measures we have in place to protect and safely store the information we collect;
- Retention of the information we collect;
- Your choices and rights in respect of the information we hold;
- How to contact us;
- How to make a complaint; and
- Changes to our privacy policy.

You'll also find a note of defined words and terms at the end of this Notice.

**Principles of Data Protection**

As the 'controller' of your personal information, we have adopted the following principles to ensure that the personal information we hold about you is:

- Processed **fairly** and **lawfully** and with valid and informed **consent**;
- Obtained for specific and **lawful purposes**;
- Kept **accurate** and **up to date**;

- **Adequate, relevant and not excessive** in relation to the purposes for which it is used;
- **Not kept for longer than is necessary** for the purposes for which it is used;
- Processed in **accordance with the rights of individuals**;
- **Kept secure** to prevent unauthorised processing and accidental loss, damage or destruction; and
- Not transferred to any subsidiary or service provider appointed by HBW where these core principles cannot be met.

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

### ***Information collected by us***

We collect personal information about you if you express an interest in joining our organisation, apply for membership, when you book and attend our events or ask us for information. The information about you which we will collect in connection with these activities may include:

- Personal contact details such as your name, address, email address, telephone numbers and fax numbers;
- Personal information relating to your clients, customers, employees and other individuals connected with your business or organisation which you disclose to us;
- Images of you and other individuals which you have supplied to us;
- Images taken of you at our events;
- Your requests for information from us;
- Your feedback and contributions to questionnaires and surveys by our organisation; and
- Your complaints, compliments or concerns about our organisation.

When using our website, we collect standard internet log information including:

- IP address
- Details of the pages you visit
- General details about the type of computer or device that you are using

This is statistical information only which we collect in order to find out the numbers of visitors to our site and the pages they have visited. This information is collected in such a way that it is not used to identify individuals. Where we do collect personal information on the website, for example if we decide to include a facility to accept applications for our Awards or Charity of the Year via the website, this will be made obvious to you through the relevant pages.

Please be aware that our website may provide you with links to other websites. If you follow a link to any other website please note they have their own privacy notices. We do not accept any responsibility or liability for the privacy and security practices of such third-party websites and your use as such is at your own risk.

### **What are our responsibilities to you?**

As a data controller, we are responsible for ensuring our systems, processes, people and suppliers comply with data protection laws in relation to the information we handle.

All of our people must abide by this Notice when handling personal data and must take part in any required data protection training. Any breach will be taken seriously and may result in disciplinary action.

We currently have a Data Protection Leader to oversee our compliance with data protection laws and this Notice, and to provide guidance and advice to HBW and our people as required. Our Data Protection Leader will be responsible for reporting any failures to comply with the data protection legislation.

### **How we may use the information we collect**

We may use the information we collect for the following purposes:

- To advertise and publicise our events, competitions and to promote HBW to you;
- To administer payments received from you;
- To facilitate our meetings and events which you have chosen to attend;
- To send you our newsletter and other information which we think might be relevant to you;
- To monitor the effectiveness of HBW and to ensure that we meet the needs of those who we serve;
- To verify your identity and to respond to any query that you may raise with us;
- To provide relevant information to you;
- To manage our relationship with you and to administer and maintain our records; and
- To meet our legal obligations.

If you no longer want us to use your data in this way, please write to us at **info@hbw.scot**.

We will not apply automated decision making to your information.

## **How we may share the information we collect**

We may share your personal data with the parties set out below for the purposes described above:

- Third parties attending our events (in such circumstances information shared will generally be restricted to names and organisation);
- Third parties through social media, advertising or publicity material (in such circumstances information shared will be restricted to names and images);
- Third parties who provide services to HBW (in such circumstances information shared will be restricted to the least amount of information possible to provide the service);
- Third parties visiting our website if you are a member and choose to share your details in our member directory;
- Courts, regulatory bodies or law enforcement agencies;
- Third party companies and organisations contracted by us to help supply, maintain or facilitate our website including IT support teams for our databases;
- Our appointed solicitors and other professional advisors if necessary; and
- Our people, but their use shall be limited to the performance of their duties. Our directors are required to keep personal information confidential and are not permitted to use it for any purposes other than administration of HBW.

The following activities are carried out by third-party service providers:

- Event ticket purchases are processed through Ticket Tailor
- Newsletters are sent via MailChimp

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

If the interests of HBW are transferred to or integrated with another organisation your details may also be disclosed to our advisors and any prospective transferees and their advisors and will be passed on to the new custodians of HBW. If a change happens to HBW, then the new custodians of HBW may use your personal data in the same way as set out in this Notice.

We will not share, sell or trade your personal information with any other third party without your  
Consent.

## **Whether information has to be provided by you**

The provision of your personal information is necessary to enable us to administer your membership, attendance at our events and receipt of our newsletter. Without this information, we will not be able to administer these activities. You are under no obligation to continue your membership, attend our events or receive our newsletter. You can withdraw your consent at any time.

## **Legal grounds for using personal information**

We rely on the following legal grounds to process personal information, namely:

**Legitimate interests:** We may use your personal data to provide you with information you have requested or with other promotional information or announcements. We will always act reasonably and give full and proper consideration to your interests when balancing them against our legitimate interest, and we will only process the minimum data required in order to achieve this legitimate interest.

**Consent:** If you supply personal data to us as part of an application for our Awards or Charity of the Year we will ask you to consent to its use for the purposes we have outlined above. You may withdraw your consent at any time. If you supply personal information relating to others as part of your application, please ensure that you have obtained appropriate consents before sharing this information with us.

**Performance of a contract:** we may need to collect and use personal information to enter into a contract with you or to perform a contract that you have entered into with us.

## **The measures we have in place to protect and safely store the information we collect**

The confidentiality and security of your information is of paramount importance to us. We have appropriate organisational and technical security measures in place to prevent personal information from being accidentally lost or accessed in an unauthorised way. However, no information system can be 100% secure. So, we cannot guarantee the absolute security of your information. We are not responsible for the security of information you transmit to us over networks that we do not control, including the internet and wireless networks.

We have taken appropriate steps to ensure that there are adequate procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

## **Retention of the information we collect**

We retain the information we collect for no longer than is reasonably necessary to fulfil the purposes for which we collect the information and to comply with our legal obligations.

We will retain information required for administration of your membership for as long as you are a member of our organisation and for six months after your membership has lapsed.

We will retain information required for administration of your attendance at our events for six months after the event has taken place.

We will retain information required for administration of your receipt of our newsletter for as long as you subscribe to our newsletter. If you decide to cancel the receipt of our newsletter your information will be removed on receipt of the request or as soon as possible thereafter.

After the retention period has elapsed, information that could be used to identify you personally will be removed.

## **Your choices and rights in respect of the information we hold**

Personal data must be processed in line with individuals' rights, including the right to:

- Access your personal information and request a copy of it;
- Require us to correct any mistakes in your information which we hold;
- Require the erasure (i.e. deletion) of personal information concerning you, in certain situations. Please note that if you ask us to delete any of your personal information which we believe is necessary for us to comply with our contractual or legal obligations, we may no longer be able to provide care and support services to you;
- Opt out at any time to processing of personal information concerning you for direct marketing;
- Restrict our processing of your personal information in certain circumstances
- In limited circumstances, request the transfer of your personal information to another party.

If you would like a copy of some or all of your personal data, please email or write to us at: **info@hbw.scot** or HBW President, c/o Ledinghalm Chalmers, 4th Floor Metropolitan House, 31-33 High Street, Inverness, United Kingdom, IV1 1HT.

## How to make a complaint

If you have any queries concerning your personal information or any questions on our use of the information, please contact our Data Protection Leader the HBW President by email or at the address above.

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

## Changes to this privacy notice

We keep this Notice under regular review and we will notify you by posting notice of the changes in a clear and conspicuous manner on our website

This Notice was last updated 18 October 2023.

## More information

Detailed information about your rights under Data Protection legislation can be found on the website of the United Kingdom Information Commissioner, the address of which is (as at the date of this policy) [www.ico.org.uk](http://www.ico.org.uk).

## Defined words

In this Privacy Notice, the following terms have the following meanings:-

<b>"data"</b>	recorded information whether stored electronically, on a computer, or in certain paper-based filing systems;
<b>"data controller"</b>	a person who or organisation which determines how personal data is processed and for what purposes;
<b>"data protection leader"</b>	the person designated as the Data Protection Leader of HBW from time to time;
<b>"individual" or "you"</b>	the person whose personal data is being collected, held or processed;
<b>"personal data"</b>	Information which relates to an individual and from which he or she can be identified either directly or indirectly through other data which HBW has or is likely to have in its possession. These individuals are sometimes referred to as data subjects.

<b>"our people"</b>	means members, directors, consultants, employees, temporary workers and those on work placements providing services to/working for HBW;
<b>"notice"</b>	this Privacy Notice as amended from time to time;
<b>"principles"</b>	the core data protection principles set out in this Privacy Notice;
<b>"process" or "processing"</b>	any activity that involves use of personal data, including: obtaining, recording or holding personal data, or carrying out any operation or set of operations on personal data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring personal data to third parties or allowing them access to it as set out in this Notice.