

# Privacy Policy

## Definitions:

We, Us, Our, CTA – refers to the Commercial Tenants Association Limited.

Data Protection Legislation – refers to all applicable privacy and data protection laws including (i) the General Data Protection Regulation ((EU) 2016/679), the Data Protection Act 2018 and any further or additional national implementing laws, regulations and secondary legislation in England and Wales relating to the processing of Personal Data and the privacy of electronic communications, as amended, replaced or updated from time to time, including the Privacy and Electronic Communications Directive (2002/58/EC) and the Privacy and Electronic Communications (EC Directive) Regulations 2003 (SI 2003/2426).

## Introduction

We respect your privacy and are committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

## Purpose of this privacy policy

This privacy policy aims to give you information on how we collect and processes your personal data through your use of this website.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

## Controller

The CTA is the controller and responsible for your personal data.

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us at [legal@thecta.co.uk](mailto:legal@thecta.co.uk)

Changes to this Privacy Notice and your duty to inform us of changes

We keep this privacy policy under regular review.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

### Personal data we receive

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity data (including your first name and last name);
- Contact data (including your billing address, delivery address, email address, telephone contact numbers and social media contact information);
- Financial Data (including bank account and payment card details).
- Transaction Data (including details about payments to and from you and other details of products and services you have purchased from us).

- Technical Data (including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website).
- Profile data (includes your username and password, purchase history, preferences, feedback and survey responses);
- Usage Data (including information about how you use our website, products and services].
- Marketing and Communications data (including your preferences in receiving marketing from us and your communications preferences);
- Special Category Data (dietary or access requirements when booking and attending events)

We may also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data, which will be used in accordance with this privacy policy.

We do not generally collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

There may be unavoidable occasions where special category data is collected on a multimedia device at a CTA event or when applying for some volunteer positions. In these cases consent will be sought to process the data.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In

this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

How is your personal data collected?

We use different methods to collect data from and about you including through:

Direct interactions.

You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply for membership;
- express an interest in membership;
- apply to be a Supplier;
- subscribe to email communication as a non-member;
- request information about CTA services;
- attend a CTA event;
- enter a competition, promotion or survey;
- give us feedback or contact us.

Automated technologies or interactions.

As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy for further details.

Third parties or publicly available sources.

- We will receive personal data about you from various third parties and public sources as set out below:
- Technical Data from the following parties:
- analytics providers, such as Google based outside the EU;
- search information providers, such as Google based outside the EU;
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
- Identity and Contact Data from data brokers or aggregators based inside the EU.

- Identity and Contact Data from publicly available sources such as Companies House.
- Identity and Contact Data from Members and suppliers registered with the CTA.
- Profile data from CTA service providers

How your personal data will be used?

We will only use your data in circumstances where the data protection legislation allows us. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform a contract we are about to enter into or have entered into with you;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- Where we need to comply with a legal obligation;
- Where we have received your informed and specific consent to do so.

We have set out below, in a table format and within the numbered paragraphs thereafter, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Please note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table following.

Purpose/Activity	Type of data	Lawful basis for processing.
To register you as a member or subscriber	(a) Identity data (b) Contact data	(a) Performance of a contract with you

<p>As a member, to provide you with</p> <p>(a) information about membership benefits,</p> <p>(b) local news and events,</p> <p>(c) policy, lobbying and campaigning activity</p> <p>(d) First Voice magazine, email and webinars</p>	<p>(a) Identity data</p> <p>(b) Contact data</p> <p>(c) Marketing and Communications data</p>	<p>(a) Necessary for our legitimate interests (to ensure that small businesses are made aware of the support services offered by the CTA)</p>
<p>As a non-member, to provide you with information about our membership and services</p>	<p>(a) Identity data</p> <p>(b) Contact data</p> <p>(c) Marketing and Communications data</p>	<p>(a) Consent</p>
<p>To process and deliver your membership including:</p> <p>(a) Manage payments, fees and charges</p> <p>(b) Process your Renewal</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Financial</p> <p>(d) Transaction</p> <p>(e) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to recover debts due to us)</p>

<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
<p>To promote the work of the CTA and the contribution of small businesses to the UK economy</p>	<p>(a) Identity</p>	<p>(a) Necessary for our legitimate interests (to support Commercial Tenants)</p> <p>(b) Consent (where special category data has been collected)</p>
<p>To administer events and register you as an attendee or applicant</p>	<p>(a) Identity data</p> <p>(b) Contact data</p> <p>(c) Special category data</p>	<p>(a) Performance of a contract with you</p> <p>(b) consent (dietary and access requirements)</p>

<p>To enable you to partake in or complete a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how members use our products/services, to develop them and grow our business)</p>
<p>To process, verify and validate nominations for a CTA volunteer role</p>	<p>(a) Identity</p> <p>(b) Contact</p>	<p>(a) Consent</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>



To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	(a) Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, events, customer relationships and experiences	(a) Technical	(a) Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

2. We will only use your data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. In these instances we can explain this to you. If we need to use your data for an unrelated purpose, we will notify you and explain why we can do this. Please note that we can process your data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## Marketing

Your personal data may be used to:

1. Provide you with a more personalised experience whilst using our website, including advertisements for relevant services and products.
2. Keep you informed about services and products available to you as a CTA member unless you have told us that you do not wish to receive such information. This could be by email, postal mail, phone or text.

## Opting out

You can ask us to stop sending you marketing messages at any time by logging into your dashboard and adjusting your communication preferences. Where you opt out of receiving marketing messages, this will not apply to personal data provided to us as a result of your membership.

## Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our [cookie policy](#).

## Sharing Personal Information

We may disclose your personal information to third parties in the following circumstances:

- When a specific service is being provided on our behalf. We will ensure that your personal information is handled as if we were processing it ourselves and under the same terms as this privacy notice. We will only share the minimum information that they need to undertake the service and we will ensure that they keep your information secure.
- When we are providing a service on your behalf. This data will be collected through online application forms, which are to be completed voluntarily, and will only be shared with the organisations identified at the time it is received.
- When you have requested information about a service or product provided by an affiliated partner and only with your specific consent.
- When you are a member to your local membership adviser to ensure you receive the best support from the CTA.

## International Transfers

In general personal data collected from you will be stored at a destination within the UK.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries or organisations, which have been deemed to provide an adequate level of protection for personal data by the UK regulatory authority
- Where we use certain service providers, we may use specific contracts approved by the UK regulatory authority, which give personal data the same protection it has in the UK.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

## Data security

We have put in place appropriate security measures to prevent your personal data from addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## Data retention

How long will we use your personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our members (including Contact, Identity, Financial and Transaction Data) for seven years after they cease being members for tax purposes.

In some circumstances you can ask us to delete your data: see your legal rights below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## Your Legal Rights

Under the data protection legislation you have a number of rights with regard to your personal data.

You have the right to:

- a) Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- b) Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- c) Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed

your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons, which will be notified to you, if applicable, at the time of your request.

d) Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information, which override your rights and freedoms.

e) Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

(f) Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

g) Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

You do not have to pay any fee to request access to the personal information that we hold. However, if your requests become unfounded, repetitive or excessive we have the right to refuse your request or charge you a reasonable fee.

## Complaints

You 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 ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance at [legal@thecta.co.uk](mailto:legal@thecta.co.uk)

## Identity and contact details of controller and data compliance advisor

The CTA is the controller of data for the purposes of the data protection legislation.

If you have any concerns as to how your data is processed, or if you have any questions about this privacy policy or our privacy practices more generally, you can contact our data compliance managers at [legal@thecta.co.uk](mailto:legal@thecta.co.uk), or you can write to us at:

the CTA,  
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20 Birchin Lane  
London  
EC3V 9DU