

## CHCS CLG Privacy Notice

### Key details

- Approved by CHCS Council on 23/5/2018
- Policy became operational on 24/5/2018
- Next review date: 23/5/2018

The Chemical Hazards Communication Society (CHCS) take your privacy seriously. This Privacy Notice explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we'll use, store and handle that data, and how we keep it safe.

We reserve the right to amend this Policy from time to time, without prior notice. Our website, [www.chcs.org.uk](http://www.chcs.org.uk) will always display the most up to date Policy.

### Who We Are

We are CHCS CLG (a Company Limited by Guarantee), trading as the Chemical Hazards Communication Society, and known in short as "CHCS". References to "CHCS" in this document should be construed accordingly. We can be contacted by email at [enquiries@chcs.org.uk](mailto:enquiries@chcs.org.uk) and by phone at +44 (0) 333 210 2427. CHCS is a non-profit members' association.

To be a member, individuals must pay an annual fee. CHCS also runs events such as webinars, seminars and training courses for members and non-members (for which fees can be charged), sends out News Alerts to members who have subscribed to this free service, and, on an ad-hoc basis, communicates with all members and non-members in our databases, via email, about forthcoming events, surveys, etc. We also run a questions "Forum" for members and non-members, communicating with registered Forum members via email.

### CHCS's Lawful Bases For Processing Data

We have determined that CHCS's Lawful Bases, under the General Data Protection Regulations (GDPR) are as follows:

1. **Consent:** we collect your personal data with your consent, for example, when you ask to be added to our mailing list in order to receive news, ad-hoc mailings, etc.
2. **Contract:** in order for you to become a paid-up member of CHCS we need to collect certain personal data to enable us to manage your membership. We cannot offer membership to individuals who do not consent for us to collect and store their personal data.



## Why Do We Collect, Store and Process Data?

The data we collect is kept to an absolute minimum to allow CHCS to:

- manage CHCS membership from initial registration as a new member, alert existing members of annual membership renewals and to process membership renewals when authorised to do so;
- send CHCS members and non-members information about forthcoming events, important news related to chemical hazards or any other item of information that CHCS believes will be of interest to members or registered non-members;
- send email new alerts to CHCS members who have registered for this service;
- process requests from members and non-members to register for CHCS events (seminars, webinars, our AGM, etc.) and manage their registration up to and after the events (e.g. sending Agendas, Feedback Forms, etc.).
- communicate with registered members of the CHCS Forum, via email.

## What Data Do We Collect, Store and Process?

CHCS collects, processes and stores data provided to it by you.

For members the data we collected is personal / company information including names, position in company, company names, email addresses, postal addresses, telephone numbers, website address, and invoicee details (where applicable): name, company name, address. We also request and store Purchase Order Numbers, where applicable.

We do not request, store or process any bank account or credit card information. We may request, store and process any bank account information, in instances where we need to make a payment to you, or investigate a missing payment from you.

For non-members who subscribe to be on our mailing list we only collect: names, position in company, company names, email addresses, postal addresses, telephone numbers and website address.

For registered Forum subscribers who are not members of CHCS we collect your name, email address, job title, company name, address and phone number.

## How Do We Collect Data and Where is it Stored?

For membership and event data we collect your data via forms, containing specific fields of information via our membership & events system (members and non-members). You enter the data online, via web pages.

To register for the Forum you send us your personal data by email.

To manage these data, we use the following:

- CHCS's Membership and Event Management system – a proprietary “cloud-based” system;
- CHCS's accounts system – a proprietary “cloud-based” system;
- For the Forum: the CHCS Membership and Event Management System.

Occasionally a member or non-member may send us data via email which we manage and store with proprietary email.

## Who has Access to the Data?

Your data is only accessible by designated members of the CHCS Council, CHCS's contracted Office Administrators and our contracted Accountants (our “Processors”).

## Will the Data Be Shared With Any Third Parties?

Your data is never shared with any other organisation except those software systems described above.

## How Long Do We Keep the Data?

We only keep your data for as long as is necessary for the purpose for which it was collected.

Your data is kept in Membership and Event Management System as long as you are:

1. a signed-up member of CHCS
2. wish to remain a non-member contact to receive notifications, news, etc.

Your data is kept in the Forum system as long as you wish to remain a member of the Forum.

Your data, including details of the financial transactions is kept in the accounting system for a minimum of seven financial reporting years, in order to comply with legislation governing this.

If you are a member and decide not to renew your CHCS membership we will ask if you wish your details to remain on the database for mailing purposes. If not, we will delete all your data.

## Is the Data Secure?

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online. We secure access to all data entry forms using “https” technology. Access to your data is password protected and restricted as discussed above.

## Credit Card & Bank Account Details

We do not collect, store or process any data relating to credit cards. You can pay for our services by credit card (and receive any repayment to your credit card), but these transactions are handled by an external organisation, [www.stripe.com](http://www.stripe.com). At no point does any CHCS system handle any credit card number, expiry data, PIN-type information or any other of your card details.

We do not routinely collect store or process bank account data. We will only ever request your bank account data if we need to investigate a payment from you which appears to be missing, or if we need to make a payment to you. In those cases, the data will be deleted as soon as the investigation is concluded or the payment is completed.

## Your Rights

Under Data Protection Laws you have the following rights. You can contact us to exercise these rights at any time by contacting the CHCS office by email to: [enquiries@chcs.org.uk](mailto:enquiries@chcs.org.uk).

- **Information** about your personal data, how we collect, store and process it. This Privacy Notice provides you with that information;
- **Access** to the personal data we hold about you, free of charge in most cases.  
The CHCS Membership system provides a login for you as a member through which you can access your personal data and edit it. In addition, with each annual renewal email, we include the personal data we currently store and ask you to check it, edit your own profile data, or send us corrections which we then make. Non-member contacts stored in the Membership system can also access and edit their

personal data.

- **Correction** of your personal data.  
As stated above, you can access, view and edit the information we store. You can make a request to us to correct any of the data we hold on you.
- **Erasure** of all your personal data.  
All emails sent to members and non-members have an option allowing you to request that all your stored data is deleted. You do not have to provide us with a reason. Our systems have features which allows us to delete your data completely and upon successful deletion, we would confirm this to you by email.

**We would not be able to fulfil our membership obligations to you as a member if you request that all your data is deleted. In this situation we would need to cancel your membership.**

- **Restricting processing:** you may, under certain circumstances, request that we Restrict Processing your data. We have systems in place to temporarily or permanently restrict processing (including removing you from receiving any emails from us and removing you from the Membership Directory. The data remains in the system but is not acted upon in any way.
- **Copy of your data:** you have the right to ask us for a copy of all the data we store on you and we will provide it in a suitable format, usually by email. You can check it and request us to update any data at any time.
- **Object** to your data being used for direct marketing. We have the facility not to use your email address for sending out information about forthcoming events, etc. You also have direct control over this by clicking on the “unsubscribe” option that exists on all marketing-type emails sent by us.

## How To Make A Complaint

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the UK Information Commissioner’s Office:

- tel: 0303 123 1113
- [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) (opens in a new window; please note we can't be responsible for the content of external websites)