

LCEC Website Privacy Policy

PLEASE READ THIS PRIVACY POLICY CAREFULLY BEFORE USING THE SITE

Information about us

www.londonconstructingexcellence.org.uk (“our site”) is a site operated by London Constructing Excellence Club (“LCEC”, “we”). LCEC is an unincorporated association company operated on a not for profit basis for the benefit of its members.

We are committed to protecting and respecting your privacy.

This privacy policy (“Privacy Policy”) (together with the other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. By using our site (which includes accessing, or browsing to use any part of our site), you indicate that you accept and agree to abide by, all the policies in this Privacy Policy, which are supplemental to the Terms of Use. If you do not agree to the policies of this Privacy Policy, please refrain from using our site. For the purpose of the General Data Protection Regulation (“GDPR”), we are responsible as “controller” for the personal data which we collect from you.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact the DPO using the contact details set out below.

Other applicable terms

This Privacy Policy refers to and should be read in conjunction with the following additional site terms and policies, which also apply to your use of our site:

- Our [Terms of Use](#), which set out the basis on which you may make use of our site.
- Our [Acceptable Use Policy](#), which sets out the permitted uses and prohibited uses of our site. When using our site, you must comply with this Acceptable Use Policy.
- Our [Cookies Policy](#), which sets out information about our use of the cookies on our site.

Information we may collect from you

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

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes address, email address, telephone numbers and details of your employer.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, 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 purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We 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 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.

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 goods or 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 we collect your personal data

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

- Information that you provide by filling in forms on our site. This includes information provided at the time of subscribing to any service, posting material or requesting further services. We may also ask you for information when you report a problem with our site.
- A record of correspondence with you (in the event that you contact us).
- Survey responses (we use survey responses for research purposes, although you do not have to respond to such surveys).
- Details of your visits to our site including, but not limited to, traffic data, location data, weblogs and other communication data, and the resources that you access.
- Information that you provide in order to become a member of the LCEC.
- Information about your computer, including where available your IP address, operating system and browser type and system administration. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.
- Cookies to distinguish you from other users of our site. This helps us to provide you with a good experience when you browse our site and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our [Cookies Policy](#).

Corporate Members

During the course of a corporate membership employees of the corporate body may provide personal data to us for purposes including (amongst others) attending events and receiving updates via e-mail. This personal data will be dealt with in accordance with the terms of the Privacy Policy. The corporate member should ensure that all employees who provide us with personal data are aware of the Privacy Policy.

International transfers

The data that we collect from you may be transferred to, and stored at, destinations which are outside the European Economic Area ("EEA") including, but not limited to:

- The Rocket Science Group LLC d/b/a MailChimp, a State of Georgia limited liability company; and
- Eventbrite Inc which is a Delaware corporation with its principal place of business at 155 5th Street, Floor 7, San Francisco, CA 94103, reg no. 4742147.

Whenever we transfer your personal data out of the EEA, 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 that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

By submitting your personal data, you agree to the transfer, storing or processing of it in accordance with this Privacy Policy. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

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

Data security

All information you provide to us is stored on secure servers. We have also put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In 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.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk.

Uses made of the information

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- to ensure that content from our site is presented in the most effective manner for you and for your computer;
- to provide you with information, products or services that you request from us or which we feel may interest you;
- to carry out our obligations arising from any contracts entered into between you and us;
- to allow you to participate in interactive features of our service, when you choose to do so;
- to notify you about changes to our service;
- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes; and
- as part of our efforts to keep our site safe and secure.

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

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 below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a member of the club	(a) Identity Data (b) Contact Data	(a) Performance of a contract with you
To process payments relating to your membership of the club including:	(a) Identity Data (b) Contact Data (c) Financial	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)

<p>(a) manage payments, fees and charges</p> <p>(b) collect and recover money owed to us</p>	<p>Data</p> <p>(d) Transaction Data</p> <p>(e) Marketing and Communications Data</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 and posting such review/survey response on our website</p>	<p>(a) Identity Data</p> <p>(b) Contact Data</p> <p>(c) Marketing and Communications Data</p> <p>(d) Profile Data</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 members use our products/services)</p>
<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<p>(a) Identity Data</p> <p>(b) Contact Data</p> <p>(c) Profile Data</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 the club)</p>

	(d) Usage Data (e) Marketing and Communications	
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity Data (b) Contact Data (c) Technical Data	(a) Necessary for our legitimate interests (for running the club, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation) (b) Necessary to comply with a legal obligation
To use data analytics to improve our website, products/services, marketing, member relationships and experiences	(a) Technical Data (b) Usage Data	Necessary for our legitimate interests (to define types of members for our products and services, to keep our website updated and relevant, to develop the club and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity Data (b) Contact Data (c) Technical Data (d) Usage Data	(a) Necessary for our legitimate interests (to develop our products/services and grow the club) (b) You have provided your consent

	(e) Profile Data	
To produce and circulate lists containing details of those in attendance at our events	(a) Identity Data (b) Contact Data	(a) Necessary for our legitimate interests (to improve opportunities for members to interact with and share knowledge with other club members)

Marketing

We may also use your data, to provide you with information about goods and services which may be of interest to you and we may contact you about these by post or telephone or email if you have requested that information from us or purchased goods or services from us and you have not opted out of receiving that marketing.

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

If you do not want us to use your data for marketing purposes, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the form on which we collect your data or contact us at webmaster@londonconstructingexcellence.org.uk.

Change of purpose

We will only use your personal 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. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosure of your information

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

- In the event that we sell or buy any business or assets, we may disclose your personal data to the prospective seller or buyer of such business or assets.

- If LCEC or substantially all of its assets are acquired by or merged with a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of LCEC, our directors, our community management team our staff, our members, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
- Analytics and search engine providers that assist us in the improvement and optimisation of our site.
- Credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.
- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs and other authorities who require reporting of processing activities in certain circumstances.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers (acting as our data processors) to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Your rights

You have a number of rights under the GDPR, including the right to:

- **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;
- **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;
- **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;

- **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;
- **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;
- **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;
- **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; and
- **Complain** to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.co.uk). (Please also feel free to contact us via the e-mail address below should you wish to make a complaint).

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

We will usually inform you (before collecting your data) if we intend to use your data for marketing purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise this right and any of the rights referred to above at any time by contacting us at webmaster@londonconstructingexcellence.org.uk.

Our site may, from time to time, contain links to and from the sites of our partner networks and affiliates. If you follow a link to any of these sites, please note that these sites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these sites.

Please refer to the **Terms of Use** for details of our exclusions and limitations of liability in terms of use of our site.

How long your data will be kept 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.

Details of retention periods for different aspects of your personal data are set out in the table below:

Category of Information	Retention Period (From the end of the club year to which they relate)	Reason for retention period
Year-end income and expenditure report, incorporating Membership Register and other supporting information; subscription (and other) sales invoices and purchase invoices; bank statements.	6 years	Legal and regulatory compliance requirement
Monthly Treasurer's Report; Monthly income and expenditure report, incorporating Membership Register and other supporting information.	1 year	Necessary for the legitimate interests of the LCEC (i.e. to enable its proper management).
E-mails and other general correspondence with members and others	1 year (extended on a case by case basis if there is an outstanding issue of contention, in which case one year after the issue is resolved)	Necessary for the performance of the contract and any post-contract dispute. Necessary for the legitimate interests of the LCEC (i.e. to enable its proper management).

Access to information

The GDPR gives you the right to access information held about you. Your right of access can be exercised in accordance with the GDPR.

Changes to the Privacy Policy

We may revise this Privacy Policy at any time by amending this page. You are expected to check this page from time to time to take notice of any changes we made, as they are legally binding on you. Some of the provisions contained in this Privacy Policy use may also be superseded by provisions or notices published elsewhere on our site.

Contact

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to webmaster@londonconstructingexcellence.org.uk.

Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.