**­­CAMRADATA Privacy Policy**

**Effective date: <Enter date policy to be effective or published>**

CAMRADATA knows that you care how your information is used and shared and we appreciate your trust in us to do that carefully and sensibly. Your privacy is important to us and we are committed to protecting and respecting your privacy.

This privacy policy explains how we use your inform­­ation we may collect from you, is provided to us about you or you provide to us when you use our website, visit our offices, become a recipient of our services, make use of our products or participate in a CAMRADATA surveys.

**Who we are**

We are CAMRADATA Analytical Services, trading as CAMRADATA and we are the data controller. We are part of the Punter Southall Group {link to PSG website} and our business contact details are:

|  |  |
| --- | --- |
| Registered office: | 11 Strand, London WC2N 5HR |
| Telephone: | 020 3327 5600  |
| Email: | info@camradata.com |
| Website: | www.camradata.com |
| Twitter: | @CAMRADATA |
| LinkedIn: | https://uk.linkedin.com/company/camradata/ |

**The contact detail of our Data Protection Officer is:**

|  |  |
| --- | --- |
| Name: | Richard Garmon-Jones |
| Address: | 11 Strand, London WC2N 5HR |
| Telephone: | 020 3327 5182 |
| Email: | data.protection@puntersouthallgroup.com |

**Personal data we collect**

The specific types of personal information we may collect and use about you will depend upon your use of our website facilities, services or products, how you use them and the information you choose to provide.

The types of information we collect directly from you are:

* Name, phone number (work and mobile where provided), email address
* Job title, company name;
* Company address;
* Marketing preferences;

The types of information we collect from you automatically are:

* IP address, MAC address, browser types, browser language, operating system, general location data- the country from which you accessed our website, software and hardware attributes (including device IDs), referring and exit pages and URLs, platform type, the number of clicks, files you download, domain names, landing pages, pages viewed and the order of those pages, the amount of time spent on particular pages, the terms you use in searches on our sites, the date and time you used the website, any form submitted , error logs, and other similar information;
* Opening of emails, date and time email opened, links clicked on in email

We and our website service provider (a data processor that works on our behalf), may use a variety of technologies, including cookies and similar technologies, to assist in collecting this information, as is discussed below.

**Aggregate/Anonymous Data**

We may aggregate and/or anonymise any personal information collected through the facilities, services or products offered so that such information can no longer be linked to you or your device. We may use this information for any purpose and may share this data with our third parties.

Please note that we need certain types of information so that we can provide the website facilities, services and products to you. If you do not provide us with such information, you may no longer be able to access or use our services or products.

**Personal data we obtain from third parties**

* We collect personal data from Pension Funds Online.

**Why we collect and use your personal data**

We, or our data processors, use your information for various purposes depending on the types of information we have collected from and about you and the specific facilities, services or products you use. In particular, we collect your information for the following purposes:

* to contact you in response to your enquiry about the products and services we offer;
* to provide you with and /or administer the CAMRADATA products and services you request;
* to reply to your questions about your CAMRADATA subscription;
* to provide you with newsletters, information about our forthcoming events and marketing communications;
* to enhance and improve your experience on our website, ensure the security of our website facilities and develop the service and products we offer;
* to analyse email marketing campaigns;
* to monitor and improve our customer service standards;
* to respond to you if you report a problem with our website.

The legal bases for using your information are as follows:

* Where you make an enquiry, ask a question or request information on service or product, agree to marketing communications or report a problem we will require your consent or rely on other lawful bases of processing such as legitimate interest, performance of a contract or compliance with legal obligations, before we use your information.
* Where you have requested a service or product, the use of your information is necessary for the performance of the user agreement {link to user agreement} we’ve entered into with you for the provision of those services or products;
* Where we provide you with the website facilities, services or products you’ve requested, use of your information is necessary to perform our obligations under the terms of the user agreement {link to user agreement} we have with you; and
* Where we collect your information automatically or you respond to a survey we use your information for our legitimate business interests. This is to provide security for our website, operate our business and provide our services and products, ensure safe environments for our staff and visitors to our offices, comply with legal requirements and defend our legal rights, prevent fraud and to know you, our customer to whom we are providing the facilities, services or products.

We may share your personal data with a third-party auditing organisation (ABC) so they can verify aggregated statistics about circulation and usage of our products or review our policies, processes and procedures for compliance with relevant standards. You can view their privacy policy by following this link ([www.abc.org.uk/privacy-policy](http://www.abc.org.uk/privacy-policy))”.

**Who we share your personal data with**

In providing our facilities, services and products to you we may share your personal information with other organisations or entities. Listed below are the organisations / entities, the reason for sharing and the type of the information shared.

|  |  |  |
| --- | --- | --- |
|  **Organisation / Entity** | **Information shared** | **Reason for sharing** |
| Member company of the PS Group | Name, Company Name, Email address, Company Address, Phone number | To provide you with the service you’ve requested. We will only share your information with your consent  |
| Website service provider | IP address, browser types, operating system, general country location from where you accessed our website, see above for more information | To enhance and improve your experience on our website, ensure the security of our website facilities |
| LinkedIn and Twitter | IP address, website address social media plugin located, browser and operating system used, date/time website accessed or Plugin activated | Social Media Plug-ins |
| Marketing affiliates  | Name, Company Name, Email address, Company Address, Phone number | For direct emailing of our newsletters, online surveys or notifications on information, products, services, or promotional offers  |

**Where we process your personal data outside the EEA**

It is not intended that your information be transferred outside the European Economic Area (EEA), but if it is, Model Clauses or other mechanisms approved by the European Commission will be put in place prior to us processing your information. Where required we will also obtain your consent.

You can obtain further information regarding the mechanisms used to safeguard your data by contacting our Customer Care team or Data Protection Officer at the contact details listed above.

**How long we will keep your personal data**

We will only keep your personal data for as long as we need to in order to fulfil the purposes for which it was collected, as set out in this privacy policy, and for as long as we are required to keep it by law. In order to ensure we meet our obligations, we have produced a data retention schedule that indicates when personal information should be disposed of. You can view here our retention schedule {link to retention schedule}.

**Usernames and Passwords**

Access to certain content on our website may be allowed under a written (including electronic) agreement between you or your firm and CAMRADATA and will require a username and/or password. In some cases, failure to provide personal information may prevent you from accessing CAMRADATA website(s) containing certain confidential information. By accessing and using our protected and secured website(s), you agree to maintain the confidentiality of the username and password you selected to access such site(s) and consent to our User Agreement.

**Cookies and similar technologies**

For more information on the cookies we use, the purposes for which we use them and how you can control them please refer to our Cookies Policy {link to Cookie policy}.

**Marketing and research**

You have choices when it comes to receiving marketing communications and taking part in market research. We will send you relevant news about our products and services in a number of ways including by email, but only if you have previously agreed to receive these marketing communications. When you make an enquiry via our website we will ask if you would like to receive marketing communications. You can change your marketing choices at any time online, over the phone or in writing.

We would also like to hear your views to help us to improve our services and products so we may contact you for market research purposes. You always have the choice about whether to take part in our market research.

**Applications for employment**

Our website contains a “Careers” section that links to a website where you can apply for employment at CAMRADATA. This recruitment website is administered by Jobtrain, a Punter Southall Group (PSG) service provider. The Jobtrain website collects personal information such as your personal details, contact information and work history and qualifications. It also uses cookies and other means of collecting information, which is only used to enable you to complete your application and for analytics purposes.

Jobtrain is permitted to collect, use and share your information only as necessary to perform the functions that PSG directs it to perform. Any information that CAMRADATA collect from Jobtrain in connection with the recruitment website is handled consistently with this Privacy Policy. CAMRADATA will use and share your information only for employment purposes, such as communicating with you about or evaluating you for a job opportunity or where sharing is required by law.

**External Links**

The CAMRADATA website may provide links to other third party web sites. Even if the third party is affiliated with CAMRADATA through a business partnership or otherwise, CAMRADATA is not responsible for the privacy policies or practices or the content of such external links. These links are provided to you for convenience purposes only and you access them at your own risk.

**Terms of Use**

Please also see our Terms of Use at www.camradata.com, which describes the restrictions, disclaimers, indemnification and limitation of liability governing the use of the entire CAMRADATA website.

**How to access and control your personal data - Your rights**

You have certain rights with respect to your information which are summarised below. Some of the rights are complex therefore, not all details are included in the summary:

* **Right to be informed:** you should be given, at the time your information is collected, or can ask for information about how your information is collected and used.
* **Right of access:** you can ask for copies of all the information that we process about you;
* **Right to rectification:** you can ask to have inaccurate information held about you corrected;
* **Right to erasure:** you can ask for the information held about you to be erased (subject to certain criteria);
* **Right to restriction of processing:** you can ask us to stop processing your information (under certain circumstances);
* **Right to data portability:** you can, under certain circumstances, request that we transmit your personal information to another provider of services;
* **Right to object**: you can object to your information being processed if our legal basis for processing your information is based on a “legitimate interests”. To check whether we use your information for “legitimate interests” see the section **“Why we collect and use your personal data"** above.

You also have the right to object to direct marketing. If you make such an objection, we will cease to process your personal information for this purpose.

If you would like to exercise any of your rights mentioned above, you can do so by writing or emailing our Data Protection Officer or Customer Care team at the address detailed above.

**Your right to withdraw consent**

Where you have provided consent for us to process your information you can withdraw your consent at any time. **Please note**: Withdrawal will not affect the lawfulness of processing prior to you withdrawing your consent.

You can withdraw your consent in the following ways:

* In writing, to our Customer Care team or Data Protection Officer;
* By unsubscribing to our marketing emails.

**Your right to make a complaint**

If you have a complaint about the way we process your personal information or think that we have not complied with your rights, you can make a complaint to:

The Information Commissioners Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Telephone: 0303 123 1113 or 01625 545745

Fax: 01625 524510

Website: www.ico.org.uk

**Changes to this policy**

You will be informed of changes to this policy by dedicated service emails, when you log-in to your account or by notification on our website.