

# Privacy Policy

Version 1.0 - updated May 2023

## Welcome to SBS's Privacy Policy

SBS respects your privacy and is committed to protecting your Personal Data. This privacy policy explains how and why we use your Personal Data.

## Purpose of this Privacy Policy

This privacy policy aims to give you information on how we collect and process your Personal Data through your use of this website or the SBS Mobile App, or when you interact with us via telephone, post or in person.

Neither this website nor the SBS Mobile App are intended for use by children, and we do not knowingly collect data relating to children.

It is important that you read this privacy policy in conjunction with other notices and policies. If you are directed to a third-party website, the terms of their privacy policy will apply.

This privacy policy aims to give you information on how SBS collects and processes your Personal Data.

## Data Controller

Integrated System Technologies Limited is the controller of data for the purposes of the data protection legislation.

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

We keep this privacy policy under regular review. This version was last updated 28th May 2022.

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 on +44(0)121 630 2750 or by email to [marketing@sbsleadersforum.com](mailto:marketing@sbsleadersforum.com).

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

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 on +44(0)121 630 2750, at [marketing@sbsleadersforum.com](mailto:marketing@sbsleadersforum.com), or you can write to us at:

FAO Data Compliance Manager  
Smart Building & Sustainability House,  
55 Wellington Crescent,  
Fradley,  
Lichfield,  
Staffordshire WS13 8RZ

## Who does this policy apply to?

- Members and prospective members,
- Account holders,
- Email subscribers,
- Individuals, sole traders, partnerships, and companies,
- Businesses we wish to promote products and services to,
- Individuals who contact us on social media,
- Individuals who visit our website.

Under exceptional circumstances where adjustments to normal processes may be required, individuals who have responsibility for managing, or being a point of contact, for another individual's membership.

## The data we collect about you

Personal Data, means any information about an individual person who can be identified from that information, or from other information we hold or could reasonably hold in the future. It does not include data where the identity has been removed (anonymous data). We only collect Personal Data relevant to your relationship with SBS. The types of data we collect, use, store and transfer are:

- **Identity Data** such as title, first name and last name,
- **Contact Data** includes billing address, business address, email address, social media handles and telephone numbers,
- **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,
- **Technical Data** includes internet protocol (IP) address, your login data, browser type 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, your interests with regards to SBS activity, 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 which does not identify you. If, however we combine or connect aggregated data with your Personal Data so that it can directly or indirectly identify you, we will treat that 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 memberships, information about your health, and genetic and biometric data), however it may in some circumstances be necessary. We will explain to you when we do this, why it is needed, and it will be your choice whether to provide it.

There may be occasions where Special Categories of Personal Data are collected at or during an SBS event, or when applying for some volunteer offices. These include special access requirements, accessibility, dietary requirements, videos, and photos and where possible, consent will be sought to process this 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 intend to have with you e.g. to provide you with goods or services. In cases like this, 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 your Personal Data is 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:
  - subscribe to email communications as a non-member,
  - request information about SBS services,
  - attend an SBS event,
  - enter a competition, promotion, or survey,
  - give us feedback,
  - contact us.
- **Automated technologies or interactions** – As you interact with our website, receive our marketing emails or use the SBS app, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this information by using cookies and other similar technologies.
- **Third parties or publicly available sources** – We may 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, contact, business and financial data from data brokers or aggregators based inside the UK,
- Identity and contact data from publicly available sources such as Companies House and the Electoral Register based inside the UK,
- Identity and contact data where you have made information available in the public domain including posting on one of our social media pages such as Facebook, Twitter or LinkedIn depending on your settings or the privacy policies of these social media and messaging services,
- Profile data from SBS service providers,

Other data which may relate to, or identify you, that is provided by a third-party and not explicitly requested by SBS.

## How your Personal Data is used

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

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

## Purposes for which we will use your Personal Data

We have set out below, 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.

Note in some cases we will;

- process your Personal Data on more than one lawful ground depending on the specific purpose for which we are using your data, or

- process your Personal Data without your knowledge or consent; in compliance with this policy and where this is required or permitted by law.

## Consent

Where you have provided specific consent, we will rely on that to process your information for the purposes set out at the time that the request for consent was made. This includes:

- As a member or account holder, to provide you with:
  - » Information about membership benefits,
  - » Local news and events,
  - » Policy, lobbying and campaign activity,
  - » First Voice magazine, emails, and webinars.
- As a subscriber, to issue you with information about SBS activities and services,
- As a non-member, to provide you with information about our activities, membership and services,
- As the subject of an SBS case study.
- To promote the work of SBS and the contribution of smart building and sustainability supply chain technology businesses to the built environment.

All marketing communications will contain an unsubscribe option however you may change any of your consent preferences at any time by contacting us on +44(0)121 630 2750, by email to [marketing@sbsleadersforum.com](mailto:marketing@sbsleadersforum.com) or by setting your preference choices by logging into the SBS website.

## Performance of a Contract or in readiness of such contract

The main purpose for which we process your Personal Data is so that we can provide you with products and services in accordance with the relationship you have with us.

We process your data to deliver services to you in the following ways:

- To register you as a subscriber,
- To deliver support,

- To provide you with account management functionalities (such as to update your contact information),
- To process and collect payments,
- To notify you of changes to our terms or privacy policy,
- To administer events and to register you as an attendee or applicant,
- To ask you to leave a review,
- To enable you to partake in or complete a survey,

## Legal Obligation

As an organisation we have various regulations and legal obligations we must comply with, e.g.;

- Notifying you of changes to our terms and this privacy policy,
- To administer and protect our business, and this website (including troubleshooting, data analysis, testing, system reporting and hosting of data),
- Maintaining accounting and invoicing records.

## Legitimate Interest

Where we, or a third-party, have a legitimate interest, ensuring that those interests are balanced against your data and privacy rights and freedoms. This includes:

- The recording of calls to enable us to provide effective training, monitor quality and to improve SBS services,
- Email updates to all event participants,
- Asking you to take part in research activities to:
  - » allow us to develop our goods and services in line with event participant business needs, and
  - » enable us to keep businesses informed of SBS activity,

- To provide you with information about:
  - » The products and services available to you,
  - » Event benefits,
  - » Sustainability and technology related news and events,
  - » SBS Policy, lobbying and campaign activity,
  - » SSB event magazine, emails and webinars, where we do not have your explicit consent, and have offered you the opportunity to opt-out
- Using data analytics to;
  - » improve our websites and the SBS mobile app,
  - » to keep our websites updated and relevant,
  - » monitor customer relationships and experience,
  - » understand engagement with our marketing communications and events,
  - » understand usage of our products and services, to improve or add to them,
  - » define and measure types of businesses that may benefit from our products and services and develop our marketing strategy.
- Delivering a personalised approach to our website functionality and content, to provide you with information that is relevant to you and your business, and to improve the experience of interacting with the SBS website,
- Using photographs of virtual and physical events to promote supporting organisation and SBS, by sharing on SBS social channels and within marketing materials.

Where we have identified a legitimate interest of your own, such as:

- Providing accessibility functions on our websites and apps which you may turn on or off as required.

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. If we need to use your data for an unrelated purpose, we will notify you in advance, explaining what we intend to do and providing you an opportunity to object.

## Opting out

All marketing communications will contain an unsubscribe option however you may change any of your consent preferences at any time by contacting us on +44(0)121 630 2750, by email to [marketing@sbsleadersforum.com](mailto:marketing@sbsleadersforum.com).



## Cookies

You can use this link to manage your cookies preference for this website.

You can manage your cookies preference for SBS websites by setting your browser to block cookies, please check your browser for instructions on how to do this. The effect of disabling cookies depends on which cookies you disable but, in general, the website may not operate properly if all cookies are switched off.

## Third-party links

SBS websites may include links to carefully selected third-party providers, 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 websites, we encourage you to read the privacy policy of every website you visit.

## Sharing your personal information

In providing our services, SBS group companies may collect, use or process your Personal Data on behalf of SBS. When they do this, they will do so adhering to SBS's strict policies and this Privacy Policy. The SBS group companies are;

- Integrated System Technologies Limited, company number 03474923, all of which are registered at Smart Building & Sustainability House, 55 Wellington Crescent, Fradley, Lichfield, Staffordshire WS13 8RZ.

We may disclose your personal information to other carefully selected third-party partners in the following circumstances:

- When you have requested information about a service or product provided by a third-party service provider and only with your specific consent,
- External suppliers who provide and/or help us operate our IT systems. We will only do this subject to strict contractual obligations and ensure the continued security of your information,
- Financial organisations for purposes such as payment processing, and refunds under the performance of or in readiness of a contract with you,
- To marketing providers carrying out marketing activities on our behalf.
- 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 requested.

When we share your Personal Data with any third party, we enter into a contract with them requiring strict adherence to our policies and ensuring your Personal Data is kept secure, is only used for clearly defined purposes, and are then deleted in accordance with our data retention requirements.

## International transfers

In general, Personal Data collected from you will be stored here in the UK or within the European Economic Area (EEA). We endeavour to require this of all our suppliers and partners however on occasion, it may be necessary, or unavoidable, to transfer your data outside the EEA. Where this is unavoidable, we will ensure a degree of protection comparable with our own policies and procedures is provided. Such protection will implement one or more of the following safeguards:

- 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 Information Commissioners Office
- We use specific contract clauses approved by the UK Information Commissioners Office which give Personal Data the same protection it has in the UK and Europe.
- We limit the transfers to only that data which is necessary for the objective to be achieved.
- We ensure end-to-end encryption of all data during transmission, and encryption of stored data.
- Use only suppliers and providers that hold a current ISO27001 or comparable certification in Information Security Management Systems.

Please contact us on +44(0)121 630 2750 or by email to [marketing@sbsleadersforum.com](mailto:marketing@sbsleadersforum.com) if you would like further information on the specific mechanism used by us when transferring your Personal Data out of the EEA.

## How we store your information

SBS makes use of a number of systems to store data, both “on-premise” and in the “cloud”. SBS are in full control of both physical and logical access to all on-premise systems, and it is our policy to require of all cloud services that:

- they are fully compliant to ISO27001 standards,

- As a subscriber, we will retain your data until you unsubscribe from any further communications.

In all cases where unsubscribe, or exercise your right to object or erasure, we will retain indefinitely, sufficient data to enable us to identify you within any data we hold, or might obtain, in order to respect your choice to unsubscribe, object or be erased. This will include your name, business name, postal address, email address and telephone number. Other Personal Data we hold about you will be anonymised and retained for our historic analysis purposes.

## Your legal rights

Under the data protection legislation, are provided a number of rights with regard to your Personal Data. Depending upon the specific purpose for our processing your data, you may exercise your rights as follows:

**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 you consider that there is no lawful 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 the processing** of your Personal Data where we are relying on a legitimate interest, or those of a third party, and where there is something about your particular situation which makes you want to object to processing on these grounds, as you feel it impacts negatively 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 the processing** of your Personal Data. This enables you to ask us to suspend the processing of your Personal Data where the following applies:

- If you want us to establish your data's accuracy,
- Where our use of the data is unlawful, but you do not wish 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 to transfer** 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 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.

You do not have to pay any fee to exercise your rights over the personal information that we hold. If, however your requests become unfounded, repetitive or excessive, we have the right to refuse your request or charge you a reasonable fee.

Although you do not have to, you may exercise any of your rights by

- calling us at +44(0)121 630 2750
- emailing [marketing@sbsleadersforum.com](mailto:marketing@sbsleadersforum.com)
- writing to us at the address at the top of this page
- or by speaking to an SBS staff member.

## Complaints

Regretfully there are times when someone is unhappy with something we are doing or something we have done with their data.

We genuinely want to work with you to put things right and therefore should you have any concerns, please give us the opportunity to address them by directing your concerns to our Contact Centre or our Data Governance team by calling us at +44(0)121 630 2750 or emailing [marketing@sbsleadersforum.com](mailto:marketing@sbsleadersforum.com).

We will always do everything we possibly can to satisfy your concerns, but should you remain dissatisfied, you have the right to make a complaint to the Information Commissioner's Office (ICO) at any time. Full contact details and how to raise a complaint are found on their website at [www.ico.org.uk](http://www.ico.org.uk).