

# Privacy Notice

## **1. PURPOSE OF THIS NOTICE**

This notice describes how we collect and use personal data about named representatives for member companies, their parents and/or any affiliates or subsidiaries, hereunder referred to as “you”, in accordance with the General Data Protection Regulation (GDPR), the Data Protection Act 1998 and any other national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK ('Data Protection Legislation').

Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

## **2. ABOUT US**

Iraq Britain Business Council Limited ("IBBC", "we", "us", "our" and "ours") is a non-profit membership organisation, which brings together business, trade and investment, for the benefit of the Republic of Iraq and its members. We are registered in England and Wales as a limited liability company under number: 06929280 and we are registered as an NGO in Iraq with registration number 2D76104. Our registered office is at 14<sup>th</sup> Floor Westminster Tower, 3 Albert Embankment, London, SE1 7SP.

For the purpose of the Data Protection Legislation and this notice, we are the 'data controller'. This means that we are responsible for deciding how we hold and use personal data about you. We are required under the Data Protection Legislation to notify you of the information contained in this privacy notice.

We have appointed a Data Protection Officer. Our Data Protection Officer is our Data Protection Point of Contact and is responsible for assisting with enquiries in relation to this privacy notice or our treatment of your personal data. Should you wish to contact our Data Protection Point of Contact you can do so using the contact details noted at paragraph 12 (Contact Us), below.

## **3. HOW WE MAY COLLECT YOUR PERSONAL DATA**

We obtain personal data about you, for example:

- when you request a proposal from us in respect of the services we provide;
- when you or your employer engage us to provide our services and also during the provision of those services;
- when you contact us by email, telephone, post or social media (for example when you have a query about our services); or
- from third parties and/or publicly available resources (for example, from your employer, from Companies House, HMRC or other authority);
- if you supply us with goods or services

## **4. THE KIND OF INFORMATION WE HOLD ABOUT YOU**

The information we hold about you may include the following:

- your personal details (such as your name, address, email, telephone number);

- details of contact we have had with you in relation to the provision, or the proposed provision, of our services;
- details of any services you have received from us;
- our correspondence and communications with you;
- information about any complaints and enquiries you make to us;
- information from research, surveys, and marketing activities;
- details of goods or services you may supply to us;
- Information we receive from other sources, such as publicly available information or information provided by your employer, or our other members.

## **5. HOW WE USE PERSONAL DATA WE HOLD ABOUT YOU**

We may process your personal data for purposes necessary for the performance of our contract with you or your employer or our other members and to comply with our legal obligations.

We may process your personal data for the purposes necessary for the performance of our responsibilities and activities relating to our members. This may include processing your personal data as an employee, subcontractor, supplier or customer of our members.

We may process your personal data for the purposes of our own legitimate interests provided that those interests do not override any of your own interests, rights and freedoms which require the protection of personal data. This includes processing for marketing, business development, statistical and management purposes.

We may process your personal data for certain additional purposes with your consent, and in these limited circumstances where your consent is required for the processing of your personal data then you have the right to withdraw your consent to processing for such specific purposes.

Please note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data.

### *Situations in which we will use your personal data*

We may use your personal data in order to:

- carry out our obligations arising from any agreements entered into between you or your employer or our clients and us (which will most usually be for the provision of our services);
- carry out our obligations arising from any agreements entered into between our clients and us (which will most usually be for the provision of our services) where you may be a subcontractor, supplier or customer of our client;
- provide you with information related to our services and our events and activities that you request from us or which we feel may interest you, provided you have consented to be contacted for such purposes;
- seek your thoughts and opinions on the services we provide;
- notify you about any changes to our services;
- record details of goods or services provided by you

In some circumstances, we may anonymise or pseudonymise the personal data so that it can no longer be associated with you, in which case we may use it without further notice to you.

If you refuse to provide us with certain information when requested, we may not be able to perform the services we would otherwise provide to members. Alternatively, we may be unable to comply with our legal or regulatory obligations.

We may also process your personal data without your knowledge or consent, in accordance with this notice, where we are legally required or permitted to do so.

### ***Data retention***

We will only retain your personal data for as long as is necessary to fulfil the purposes for which it is collected.

When assessing what retention period is appropriate for your personal data, we take into consideration:

- the requirements of our business and the services provided;
- any statutory or legal obligations;
- the purposes for which we originally collected the personal data;
- the lawful grounds on which we based our processing;
- the types of personal data we have collected;
- the amount and categories of your personal data;
- whether the purpose of the processing could reasonably be fulfilled by other means.

### ***Change of purpose***

Where we need to use your personal data for another reason, other than for the purpose for which we collected it, we will only use your personal data where that reason is compatible with the original purpose.

Should it be necessary to use your personal data for a new purpose, we will notify you and communicate the legal basis, which allows us to do so before starting any new processing.

## **6. DATA SHARING**

### *Why might you share my personal data with third parties?*

We will share your personal data with third parties where we are required by law, where it is necessary to administer the relationship between us or where we have another legitimate interest in doing so.

We will not sell or pass on your personal data to any commercial or charitable organisation.

### *Which third-party service providers process my personal data?*

"Third parties" includes third-party service providers and members of our organisation's network. The following activities are carried out by third-party service providers: IT and cloud services, professional advisory services, marketing services and banking services.

All of our third-party service providers are required to take commercially reasonable and appropriate security measures to protect your personal data. We only permit our third-party service providers to process your personal data for specified purposes and in accordance with our instructions.

### *What about other third parties?*

We may need to share your personal data with a regulator or to otherwise comply with the law. We will not share your personal data with other third parties without your consent.

## **7. DATA SECURITY**

We have put in place commercially reasonable and 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 data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## **8. RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION**

### *Your duty to inform us of changes*

It is important that the personal data we hold about you is accurate and current. Should your personal information change, please notify us of any changes of which we need to be made aware by contacting us, using the contact details below.

### *Your rights in connection with personal data*

Under certain circumstances, by law you have the right to:

- Request access to your personal data. This enables you to receive details of the personal data we hold about you and to check that we are processing it lawfully.
- Request correction of the personal data that we hold about you.
- 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 exercised your right to object to processing (see below).
- 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 basis. Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal data to you or another data controller if the processing is based on consent, carried out by automated means and this is technically feasible.

If you want to exercise any of the above rights, please email our data protection point of contact [London@webuildiraq.org](mailto:London@webuildiraq.org)

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 for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

## **9. RIGHT TO WITHDRAW CONSENT**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose (for example, in relation to direct marketing that you have indicated you would like to receive from us), you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please email our data protection point of contact [London@webuildiraq.org](mailto:London@webuildiraq.org)

## **10. CHANGES TO THIS NOTICE**

Any changes we may make to our privacy notice in the future will be updated on our website at:

<https://www.iraqbritainbusiness.org/privacy-notice/>

This privacy notice was last updated on ...

## **CONTACT US**

If you have any questions regarding this notice or if you would like to speak to us about the manner in which we process your personal data, please email or write to:

Data Protection Point of Contact  
Iraq Britain Business Council Limited  
14<sup>th</sup> Floor Westminster Tower  
3 Albert Embankment  
London, SE1 7SP

[London@webuildiraq.org](mailto:London@webuildiraq.org)

Telephone: 020 7222 7100

You also have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues, at any time. The ICO's contact details are as follows:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
Telephone -0303 123 1113 (local rate) or 01625 545 745

Website - <https://ico.org.uk/concerns>

**Iraq Britain Business Council Limited**  
**23 May 2018**