

Stronger Together PRIVACY POLICY – March 2024

This Privacy Policy sets out the basis on which we collect and use personal information about you as part of our activities.

This Privacy Policy describes in detail who is responsible for the personal information that we collect about you, what personal information we collect, how we will use such personal information, who we disclose it to and your rights and choices in relation to your personal information.

In this Privacy Policy where we use the words **personal information**, we use these words to describe information that is about you, and which identifies you. Section 2 below sets out the personal information we collect in more detail.

References to **we**, **us** or **our** in this Privacy Policy means the Stronger Together initiative which controls your personal information which may be:

Stronger2gether Ltd, registered in England and Wales (Company Registration No. 11598061), whose registered address is at Camberley House, 1 Portesbery Road, Camberley, Surrey GU15 3SZ

Partners and/or initiatives means programmes that we operate and other organisations who we are connected with because of the work and activities of Stronger Together. These include:

Partners:

- Association of Labour Providers Ltd (www.labourproviders.org.uk)
- Complyer (www.complyer.co.uk)

Stronger Together Initiatives

- Clearview (www.clearviewassurance.com)
- Fast Forward (www.fastforwarduk.org)
- Responsible Recruitment Toolkit (www.ResponsibleRecruitmentToolkit.org)

websites mean www.stronger2gether.org and those of our partners and initiatives listed above.

1. WHO IS RESPONSIBLE FOR THE PERSONAL INFORMATION THAT WE COLLECT?

1.1 For the purpose of data protection law, Stronger Together is the data controller in respect of the personal information that it collects and uses as part of our activities. Stronger Together has several initiatives and where these initiatives provide services to you, Stronger Together will be a data controller. A data controller is the entity that determines the purpose for which your personal information is used and how it is used.

1.2 If you are providing personal information to us relating to a third party (for instance, you are an administrator providing information on behalf of a work colleague) you automatically confirm that you have the consent of the third party to share such personal information with us and that you have made the information in this Privacy Policy available to the third party before providing their personal information to us.

2. WHAT PERSONAL INFORMATION DO WE HOLD ABOUT YOU?

2.1 We collect personal information about a range of individuals who are interested in our messages and want to support us and other individuals who work in the same industry as us and who attend our events and/or we have contact with while promoting and furthering our aims. The personal information we hold about you and the way in which we use it will differ depending on our relationship with you. We have provided further details below.

Business Contacts

2.2 This section of the notice applies if you relate to the above initiatives either through registering on the relevant website, attending events or training workshops or someone who may be interested in the work that these initiatives do or otherwise supports their aims and objectives. This includes several individuals who are not registered on our website or attend our training/events for example, stakeholders, public sector contacts and journalists. This section applies to those business contacts.

2.3 We collect and use personal information about you as part of our business activities. The personal information we collect includes:

2.3.1 Information that you provide to us

The information that you provide to us may include your name, postal address, email address, telephone number, mobile number, financial information, payment information, registration numbers, insurance information and your password to access your individual accounts within each appropriate website. All passwords are encrypted, and we do not have visibility over them, only the ability to enable you to reset it on request. This information may be provided:

- a) in the course of communications between you and us (including face to face, by phone, email or otherwise)
- b) when you fill in forms on our websites
- c) when you register to attend our events
- d) when you register to listen to our webinars
- e) when you submit business partner evidence
- f) when you request software unlock codes to use the software we provide
- g) via our social media pages, other social media content, tools and applications
- h) when you visit our events or shows or other venues or places where we are present or actively working
- i) when you call our customer service line
- j) when you enter competitions that we run from time to time and
- k) when you speak to our researchers, colleagues or people authorised on behalf of us to carry out research.

2.3.2 Information we collect from you

- a) technical information (to the extent that it constitutes personal information) including the IP address you use to connect your device to the Internet and the browser type, version you use on your device and duration of your visit to the websites);
- b) information about your use of the websites (to the extent that it constitutes personal information) including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products and/or services you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number;
- c) information contained in and records of communications between you and us, including emails, calls, SMS messages and letters;
- d) information regarding your marketing preferences;
- e) records of meetings and events you attend; and
- f) recordings of telephone conversations when you call our customer service line.

2.3.3 Information we receive from other sources

- a) details from one of our partners about any products or services you receive from them;

3. HOW DO WE USE THE PERSONAL INFORMATION WE COLLECT ABOUT YOU?

3.1 We use your personal information to carry out our activities. Your personal information may be used by us, our employees, service providers, and disclosed to third parties for the purposes set out below. For each of these purposes, we have set out the legal basis on which we use your personal information and detailed which category of personal information we use for that purpose (by reference to the paragraph numbering from earlier in this notice).

Business Contacts

3.2 In the course of running our organisation we gather personal information about a number of individuals who are not registered on our website or attend our training/events for example, stakeholders, local authority contacts and journalists, suppliers, retailers, advertisers, charities, Non-Governmental Organisations, trade associations and media contacts. This section applies to those business contacts and details which category of personal information we use for that purpose (by reference to the paragraph numbering from earlier in this notice).

Purpose	Legal Basis	Category of personal information used for this purpose
To communicate with you and other individuals.	This is in our legitimate interests because it furthers our aims and objectives and enables us to provide our resources and services to you. We may also communicate with you to perform any contractual obligations with you.	2.3.1 2.3.2
To manage our business.	This is in our legitimate interests because this furthers our aims and objectives.	2.3.1 2.3.2 2.3.3
To carry out research and analyse the services that we provide.	This is in our legitimate interests as it enables us to assess the effectiveness and relevance of the services and benefits we offer.	2.3.1 2.3.2
To send you service communications such as our newsletter.	This is in our legitimate interests as it furthers our aims and objectives. In certain circumstances we may rely on consent to send certain communications to you.	2.3.1 2.3.2
To send you details of advertising opportunities.	This is in our legitimate interests as it generates revenue to allow us to continue to further our aims and objectives. In certain circumstances we may rely on consent to send certain communications to you.	2.3.1
To promote the work that we undertake.	This is in our legitimate interests to further our aims and objectives.	2.3.1
To carry out credit checks against you or the organisation you work for in connection with the sale by us of advertising opportunities.	This is in our legitimate interest to establish if you or the organisation you work for will be able to pay for any advertising opportunity you are interested in. In certain circumstances we may rely on consent to undertake these checks.	2.3.1

3.3 We may be required to obtain your personal information to comply with our legal requirements, to enable us to fulfil the terms of our contract with you or in preparation of us entering into a contract with you. We will inform you of this at the time that we are obtaining your personal information from you.

4. HOW DO WE MARKET THE PRODUCTS AND SERVICES OF COMMERCIAL PARTNERS

4.1 Subject to any marketing preferences you provide, we may contact you from time to time with details of promotions, offers, shows and events that might be of interest to you which are offered by our initiatives and partners and other commercial partners.

4.2 Where we share your personal information with one of our commercial partners or industry bodies, we will do so because:

4.2.1 you have told us you are interested in the products or services offered by the relevant commercial partner or industry body and we need to share your details with them so that the commercial partner or industry bodies can contact you about those products or services, or grant you access to those products or services;

4.2.2 the commercial partner/industry organisation needs us to verify that you are a current member of one of our partners or initiatives for the purposes of applying any discounts or promotional offers which are linked to your membership; or

4.2.3 you have told us that you have an issue or query with the relevant commercial partner or industry bodies and we need to share your details with them to escalate the matter.

4.3 We work closely with our Partners to support businesses in the sector in which we operate so we may from time to time send you details of their products or services which we think will be of interest.

4.4 The commercial partner or industry body may use your personal information for their own purposes. For information about how the commercial partners use your personal information, please see the website of the relevant commercial partner or industry body.

5. WHO DO WE DISCLOSE YOUR PERSONAL INFORMATION TO?

5.1 We share your personal information with:

5.1.1 our services providers and sub-contractors for the performance of our membership services (including marketing services providers, IT service providers and consultants, social media providers, third party training providers and third-party storage providers);

5.1.2 certain partners as described above;

5.1.3 our professional advisors (including accountants and lawyers) that assist us in carrying out our activities;

5.1.4 analytics and search engine providers that assist us in the improvement and optimisation of our websites (including Google Analytics); and

5.1.5 external agencies and organisations for the purpose of complying with applicable legal and regulatory obligations (including HMRC etc.).

5.2 We can also disclose your personal information to other third parties, for example:

5.2.1 in the event that we sell or buy any business or assets, in which case we will disclose your personal information to the prospective seller or buyer of such business or assets;

5.2.2 if we or substantially all our assets are acquired by a third party (or are subject to a reorganisation within our corporate group), personal information held by us will be one of the transferred assets; and

5.2.3 if we are under a duty to disclose or share your personal information in order to comply with any legal obligation.

6. WHERE WILL WE TRANSFER YOUR PERSONAL INFORMATION?

We will process your personal information within the European Economic Area (EEA). We may transfer your personal information outside the EEA where we are operating an initiative in a non-EEA country. This will only be where you are directly involved with such an initiative, have provided your information in connection with such an initiative and be provided to our trusted partners within that country with whom we are collaborating on that initiative who will process your data in accordance with our data sharing agreement and for use with that initiative only.

7. HOW LONG WILL WE KEEP YOUR PERSONAL INFORMATION

7.1.1 We will keep personal information for as long as is necessary for the purposes for which we collect it. The precise period will depend on the purpose for which we hold your information. For example, where we hold personal information:

7.1.2 to comply with a legal or regulatory obligation, we will keep the information for at least as long as is required to comply with that obligation.

7.1.3 in order to provide a product or service, we will keep the information for at least as long as we provide the product or service, and for a number of years after your membership expires.

8. HOW DO WE KEEP YOUR PERSONAL INFORMATION SECURE?

8.1 We will use appropriate technical and organisational security measures which comply with the requirements of data protection law in order to keep your personal information secure against unauthorised or unlawful use and accidental loss, destruction or damage.

8.2 Unfortunately, the transmission of information via the internet is not completely secure. Although we will reasonably practicable measures to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Site and any transmission is at your own risk. Once we have received your personal information, we will use strict procedures and security features to try to prevent unauthorised access.

9. YOUR RIGHTS

You have certain rights with respect to your personal information. The application of the rights will depend on the certain circumstances and are subject to certain exemptions. Please see the table below for a summary of your rights. To exercise these rights please use the contact details at section 11.

	Summary of your rights
Right of access to your personal information	You have the right to receive a copy of your personal information that we hold about you, subject to certain exemptions.
Right to rectify your personal information	You have the right to ask us to correct your personal information that we hold where it is incorrect or incomplete.
Right to erasure of your personal information	You have the right to ask that your personal information be deleted in certain circumstances. For example (i) where your personal information is no longer necessary in relation to the purposes for which they were collected or otherwise used; (ii) if you withdraw your consent and there is no other legal ground for which we rely on for the continued use of your personal information; (iii) if you object to the use of your personal information in accordance with the right to object, as set out below; (iv) if we have used your personal information unlawfully; or (v) if your personal information needs to be erased to comply with a legal obligation.
Right to restrict the use of your personal information	You have the right to suspend our use of your personal information in certain circumstances. For example (i) where you think your personal information is inaccurate and only for such period to enable us to verify the accuracy of your personal information; (ii) the use of your personal information is unlawful and you oppose the erasure of your personal information and request that it is suspended instead; (iii) we no longer need your personal information, but your personal information is required by you for the establishment, exercise or defence of legal claims; or (iv) you have objected to the use of your personal information and we are verifying whether our grounds for the use of your personal information override your objection.
Right to data portability	You have the right to obtain your personal information in a structured, commonly used and machine-readable format and for it to be transferred to another organisation, where it is technically feasible. The right only applies where the use of your personal information is based on your consent or for the performance of a contract, and when the use of your personal information is carried out by automated (i.e. electronic) means.

Right to object to the use of your personal information and direct marketing	You have the right to object to the use of your personal information in certain circumstances. For example (i) where you have grounds relating to your particular situation and we use your personal information for our legitimate interests (or those of a third party); and (ii) if you object to the use of your personal information for direct marketing purposes.
Right to withdraw consent (including to direct marketing)	You have the right to withdraw your consent at any time where we rely on consent to use your personal information.
Right to complain to the relevant data protection authority	You have the right to complain to the relevant data protection authority where you think we have not used your personal information in accordance with data protection law. In the case of the National Farmers Union, this would be the Information Commissioner's Office.

10. CHANGING YOUR MARKETING PREFERENCES

You have the right to withdraw marketing consent or change your preferences. To do so please contact us at info@stronger2gether.org or +44 (0)1276 919090.

11. QUERIES

If you have any queries about the way we handle your personal information, please contact by e-mail: info@stronger2gether.org; by post: Stronger Together Ltd, Camberley House, 1 Portesbery Road, Camberley, Surrey, GU15 3SZ; by phone: +44 (0)1276 919090.

12. COOKIES

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policies below.

<https://www.stronger2gether.org/cookie-policy/>

13. CHANGES TO OUR PRIVACY POLICY

Any changes we make to this Privacy Policy will be posted on this page. We will inform you of the updates and where appropriate we will give reasonable notice of any changes. This Privacy Policy was last updated on 19th March 2024.