

CRELA PRIVACY POLICY

1 GENERAL

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, for example through use of our website or on the membership application form, will be processed by us.

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

For the purposes of applicable data protection laws, the data controller is CRELA c/o Teresa Edmund of Bristows 100 Victoria Embankment London EC4Y 0DH. Our nominated representative for the purpose of the Act is Teresa Edmund.

If you have any queries, please don't hesitate to contact Teresa Edmund on teresa.edmund@bristows.com

Please also be aware that the now archived website www.crela.co.uk has previously been used by and remains affiliated to CRELA. This policy applies to www.crela.co.uk until it is discontinued as well as the current website www.crela.org.uk ("Our Website").

2 INFORMATION WE MAY COLLECT FROM YOU

We may process information you give us, including, but not limited to, your name and surname, email address and other contact details, place of work and name of your company/organisation and your photograph. You may provide such information on the membership application form, when registering with or logging into Our Website, or when contacting us or any of our members.

Each time you visit Our Website, we may automatically collect the following information: technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); sections of Our Website 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); methods used to browse away from the page and any phone number used to call us.

3 HOW DO WE USE YOUR INFORMATION?

We use your information:

- to register your membership, to provide you with membership services, for general administrative purposes and to enhance our membership services in the future including the use of photographs to promote member services;
- to operate CRELA's online community (including but not limited to the members' area, the forum, the "feedback" and "contact" features, etc.); and
- to interact with you (for example, to answer a question you ask, to thank you for sending us feedback, or to respond to a message).

With your prior consent, we may use your information for marketing purposes, in particular to inform you of national and regional events, and with your further consent, we may disclose your information to third parties in relation to such events.

We will also use your information to:

- Administer Our Website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- Improve Our Website and the online community and to keep them safe and secure; and
- Notify you about changes to our service. For instance, if Our Website is temporarily suspended for maintenance, we might send you an email. Generally, you may not opt out of these communications, which are not promotional in nature. If you do not wish to receive them, you have the option to de-activate your account.

Based upon the information you provide us when registering for an account, we will send you a welcoming email to verify your username and password.

4 LEGAL BASIS FOR PROCESSING YOUR INFORMATION

The legal basis for our use of information for the purposes described in this policy will typically include:

- When the processing is necessary to fulfil a contract that we have in place with you;
- Because we have your consent to our use of your information;
- When the processing is necessary for our legitimate interests, to ensure that our services are properly provided and to promote our services; or
- Where we are subject to a legal obligation and need to use your personal information in order to comply with that obligation.

5 STORING YOUR INFORMATION

The information that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"), which has less strict, or no data protection laws, when compared to those in Europe.

Whenever we transfer your information outside of the EEA, we will take steps which are reasonably necessary to ensure that adequate safeguards are in place to protect your personal information and to make sure it is treated securely and in accordance with this policy. You may contact us for a copy of the safeguards which we have put in place to protect your personal information and privacy rights in these circumstances.

6 RETAINING YOUR INFORMATION

We take steps to ensure that the personal information that you provide is retained for only as long as is necessary for the purpose for which it was collected. After this period it will be deleted or in some cases anonymised. Where we have collected the personal information based on your consent and we have no other lawful basis to continue with that processing, if you subsequently withdraw your consent then we will delete your personal information. However, please note that where you unsubscribe from our marketing communications, we will keep a record of your email address to ensure we do not send you marketing emails in the future.

7 SHARING YOUR INFORMATION

We will only share your information with government, law enforcement agencies and regulatory bodies when we consider the disclosure to be fair, reasonable and legal, or when legally obligated to do so.

We may share your information with third party service providers, for example TPS Limited, our database administrator, or for marketing purposes as set out above.

We may also, from time to time, where we have your consent or are otherwise permitted to do so by applicable law, share your personal information with other reputable organisations, so as to maximise the benefit of your membership.

8 SECURITY

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of all data transmitted to Our Website or sent to us by email; any transmission is therefore at your own risk. Once we have received your information, we will use procedures and security features to try to prevent unauthorised access.

Should a breach occur, we will take appropriate steps to notify you if you are, or could be affected and will make all efforts to minimise the impact.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

9 LINKS TO THIRD PARTY WEBSITES

Links to several websites owned and operated by third parties, such as our sponsors, appear on Our Website. If you follow any of these links, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies or the wider content of these websites. We encourage you to note when you leave Our Website and to read the policies of any such third parties before you submit any personal data to these websites.

7 CHANGES TO THIS PRIVACY POLICY

We keep our privacy policy under regular review. Changes to our privacy policy will be posted on this page and where appropriate, you will be notified by email.

8 YOUR RIGHTS

You have certain rights in relation to your personal information. These include: the right to object to and / or withdraw consent to the processing of your personal information, the right to access your personal information, and the right to erase, restrict or receive a machine-readable copy of your personal information.

We will handle any request to exercise your rights in accordance with applicable law. If you wish to exercise any of these rights please refer to the "Contact Us" section of this policy. You also have the right to ask us not to process your personal data for marketing purposes. You can exercise your right to prevent such processing by not ticking the relevant boxes on the forms we use to collect your data. You can also exercise this right at any time by contacting us.

9 CONTACT US

If you have a question, complaint or query with regards to how we use your information, please contact us/our nominated representative using the email address in section 1 of this policy and we will do our best to resolve it as soon as possible.

You may also have the right to complain to a data protection authority if you think we have processed your personal information in a manner which is unlawful or breaches your rights. If you have such concerns we request that you initially contact us so that we can investigate, and hopefully resolve, your concerns.

Last updated: 21/01/2019