

## Privacy Notice for Members/Customers

### To comply with the General Data Protection Regulations

Date updated: August 2023

As a member of the Society, we are required to collect and process personal information about you to assess your eligibility for membership and to ensure that we can provide you with the benefits that membership affords. The Society is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

This statement explains how we collect, use, transfer and store your personal data when you apply and during your period of membership with the Society.

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#### 1. Important information and who we are:

##### *About this privacy notice*

This privacy notice aims to give you information on how Radstock Co-operative Society collects and processes your personal information as part of the application to join as a member and participate in the "Membership Dividend Card" scheme. This also applies if you take part in a competition or sign-up to receive marketing information.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal information about you so that you are fully aware of how and why we are using your information. This privacy notice supplements the other notices and is not intended to override them.

### *Who's responsible for your personal information?*

The Radstock Co-operative Society is responsible for the data it holds on to its membership and customer databases and is the 'data controller' for your data.

We have appointed a data protection officer to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the Society's Data Protection Officer at [enquiries@radstock.coop](mailto:enquiries@radstock.coop) or by writing to: Data Protection Officer, Radstock Co-operative Society, Co-operative House, 3 Wells Hill, Radstock BA3 3RQ.

If you do not think that we have processed your data in accordance with this notice you should let us know as soon as possible.

### *Changes to the privacy notice and your duty to inform us of changes.*

We may change this privacy notice from time to time. You should check this notice occasionally to ensure you are aware of the most recent version.

It is important that the personal information we hold about you is accurate and up-to-date. Please keep us informed if your personal information changes during your relationship with us.

### *How we share your data*

Our website may include links to trading partners' websites, third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. When you leave our website, we encourage you to read the privacy notice of every website you visit, particularly third-party websites as we do not control those.

## 2. The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes first name, last name, username or similar identifier, marital status, title, date of birth.
- Contact Data includes address, email address and telephone numbers.
- Financial Data includes bank account details, which we may require in relation to your membership account.

- Transaction Data includes details about payments to and from you relating to the administration of your membership account.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types 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, preferences, educational status, feedback and survey responses.
- Usage Data includes information about how you use our website.
- 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 for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature.

However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

#### *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 are trying to enter into with you (for example, the administration of your membership account). We will notify you if this is the case at the time.

### 3. How your personal information 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:
  - apply to become a member of The Radstock Co-operative;
  - subscribe to our service or publications;
  - request marketing to be sent to you;

- enter a competition, promotion or survey; or
- give us some feedback.
- Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

#### 4. How we use your personal information

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

##### 4.1 Other Ways we might use your personal information.

We may also need to process your personal data from time to time where necessary for:

- Preventing and detecting crime or anti-social behaviour. For example, we'll use CCTV in and around our buildings or Body Worn Cameras.
- Dealing with any legal claims.

If we're using your personal information in the above ways, we really understand that your data has a value and therefore we try to use it for everyone's benefit. We also try really hard to ensure there will be little or no negative impact on you. This is part of our commitment to ensure that we consider all privacy concerns at the earliest possible opportunity.

##### 4.2 Purposes for which we will use your personal information.

We have set out below, in a table format, 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 that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Purpose/ Activity	Type of Data	Lawful basis/ legitimate interest
To register you as a new member	Identity, contact	Performance of a contract with you
Administrative matters relating to your membership account	Identity, contact, financial, transaction	Performance of a contract with you comply with legal obligation
To manage our relationship with you which will include notifying you about changes to our terms or privacy policy asking you to leave a review or take a survey	Identity, contact, profile, marketing & communications	Performance of a contract with you comply with legal obligation legitimate business interest (keep data up-to-date etc.
To enable you to partake in a prize draw, competition or complete a survey	Identity, contact, profile, marketing & communications	Legitimate business interest (to understand how customers/members use our products and services)
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	Identity, contact, profile, marketing & communications, usage	Legitimate business interest to study how members/customers use our products and services
To deliver relevant promotions/offers, news from the Society through your interactions with us through our stores, contact centers, online or by using the "APP"	Identity, contact, profile, marketing & communications, usage	Legitimate business interest to study how members/customers use our products and services

### 4.3 Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### 4.4 Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion.

We won't use your personal data for marketing purposes at all if you've told us not to and we'll give you the opportunity to opt-out of receiving marketing information whenever we contact you directly for that purpose.

#### 4.5 Third-party marketing

We will get your express opt-in consent before we share your personal data with any third parties.

#### 4.6 Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

#### 4.7 Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly.

#### 4.8 Change of purpose

We will only use your personal 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### 5. Sharing your personal information

We may have to share your personal data with the parties set out below for the purposes set out in the table in section 4.2.

- External third parties including the following:
  - Organisations that provide outsourced printing, mailing and distribution services, such as the printing and mailing of membership cards and share of profits mailings.
  - Organisations to which we may outsource certain other activities, such as membership database cleansing.
  - Electoral Reform Services in connection with our board member elections.
  - Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
  - HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
  - Where we are under a duty to disclose or share your personal data to comply with any legal obligation to enforce or apply our terms of use and other agreements; or to

protect the rights, property, or safety of our colleagues, customers, regulators, or others. This includes exchanging information with other companies and organisations for the purpose of fraud protection, prevention of money laundering and credit risk reduction.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

### 5.1 International transfers

We do not transfer your personal data outside the European Economic Area (EEA).

## 6. Keeping your information secure

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those colleagues, 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 personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 7. Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Subject to the further points below, we will keep information about you for a maximum of 7 years after the end of our relationship unless obligations to our regulators or law requires otherwise, or we are required to remove such data from our records.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your data: see Request erasure below for further information.

## 8. Your rights

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes.

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

- Request access to your personal information (commonly known as a "data subject access")



request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

- Request correction of the personal information that we hold about you. This enables you to Have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below)
- Object to processing of your personal information 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 ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

## 8.1 Subject Access Requests

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Society's Data Protection Officer.

You will not have to pay a fee to access your personal information (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.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

## 8.2 Complaints to the regulator

If you do not think that we have processed your data in accordance with this notice you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. You can contact them by going to their website at [ico.org.uk](http://ico.org.uk), phoning them on 0303 123 1113 or by post to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF.