

The Institute of Workplace and Facilities Management Published February 2019

The Institute of Workplace and Facilities Management (IWFM) is the controller of personal data provided to us and is therefore committed to respecting the privacy of individuals and as required by the General Data Protection Regulation (GDPR) is registered with the Information Commissioner's Office. IWFM's registration number is Z7132357.

This Privacy Policy describes how IWFM processes the personal data that it collects about you. Therefore, please read this Privacy Policy carefully.

What personal data does IWFM collect?

IWFM collects personal data which identifies you or that can be used to identify you. This personal data may include information such as your name, age, home address, telephone number, e-mail address, gender, organisation name, job title, business address, membership number and grade, examination/qualification records, bank and payment details, education and training details, IP address, CPD record and expression for areas of interest.

How is personal data collected by IWFM?

- IWFM website
- Email, post, telephone
- In person; events, conferences, exhibitions and via IWFM employees, members and affiliates
- IWFM social media channel and discussion forums
- Third parties

Why we need your data

We need to know your data to facilitate the provision of a product or service to you as a customer, member, learner or supplier. We will only collect the information that is essential to provide and oversee this service to you.

How does IWFM use your personal data?

- Administering and managing your membership of IWFM (e.g. for the purposes of allocating a membership grade, circulating members' benefits and governance communication, making offers of membership, internal communication and administration of your membership, implementing financial transactions relating to your membership, understanding and building profiles of IWFM members, etc)
- Administering and managing your qualification through the Professional Standards and Education team
- Administering and managing your training via IWFM Academy

- To communicate relevant CPD enhancement activities and processes
- Advertising, promoting and marketing the business, products, services and activities of IWFM that may be of interest to you (including without limitation, sending you e-mail notifications and otherwise alerting you to information regarding IWFM events and courses)
- Sending you e-mail notifications or e-newsletters and otherwise alerting you to information that IWFM believes may be of interest to you regarding other third parties' products, services and activities.
- To continue to develop the business, goods, services and activities of IWFM.
- To respond to enquiries and to keep you updated with the progression of any ongoing investigations
- The creation of an IWFM Register of Members

Personal Data will only be processed where one or more of the following conditions apply:

- You have provided us with explicit consent to process your data
- We have legitimate interests, which include processing Personal Data for the purposes of providing, improving and advertising our products, services and information
- Where such processing is necessary to perform a contractual agreement with you or in preparation of entering into a contract with you
- When necessary to comply with a legal obligation, resolve disputes and enforce our contractual agreements.
- When membership is provided as a benefit of a Qualification

The Use of Cookies

IWFM's web site also makes use of 'cookies', which are small text files that contain a unique identification number written to a user's hard disk and read by a server program. Cookies are used to keep a record of your details in order to recognise you the next time you visit IWFM's web site. You are able to disable the use of cookies via your internet browser; however, this may mean that you will not be able to log in to IWFM's web site.

For more information regarding the different types of cookies that our website makes use of, please refer to our <u>Cookie Policy</u> for further details.

Links to other Websites

IWFM's website may contain links to other sites not controlled or monitored by IWFM. These sites may independently send you cookies and collect data and information. IWFM is not responsible for, and does not accept any liability, for their actions or the content of their sites.

Who IWFM may disclose your personal data to

All personal data is processed internally by our staff in the UK, however IWFM may share part or all of your personal data with the following third-party categories or persons:

- IWFM Regional/Special Interest Group representatives for the purpose of administering and managing your membership and member events. Such representatives are obliged to comply with a Code of Conduct in relation to their use and storage of your personal data.
- Business associates and trusted suppliers, data processors and contractors for the purposes of administering and managing your membership of IWFM and for the purposes of providing you with information, products and/or services requested by you and managing and administering such requests.
- Business associates, data processors and other trusted suppliers of goods or services for the purposes of providing you with information that IWFM believes may be of interest to you regarding IWFM's or its members' or other third parties' products and/or regulatory services.
- Government/Regulatory authorities, if legally required to do so, or if IWFM believes necessary in connection with an investigation of any activity that is illegal or may expose IWFM to any liability.
- IT hosting and maintenance
- For the purposes of event organisation, hosting platforms and venues.
- Third parties in connection with any proposed merger and/or acquisition, re-organisation, or sale
 of all or substantially all of IWFM's business.

International Customers

We may use data processors within your region to provide you with information relating to IWFM services. We have contracts in place with our data processors that dictate how your data is used and the period of which it is retained. Our data processors will not share your information with any other organisation apart from us.

Transfer of Personal Data Internationally

Our staff are sometimes required to work overseas and therefore required to connect to external servers or data connections throughout their duration in any particular destination. By providing us with your data you acknowledge and agree to this potential requirement. Where personal data is transferred outside of the European Economic Area, appropriate safeguards have been implemented to ensure data is secure and privacy is protected to the same standard as it is in the EU. Data will never be intentionally shared with international organisations.

Security

IWFM takes all reasonable steps to ensure that the personal data you disclose to IWFM remains in a secure environment. However, IWFM cannot and does not guarantee that your personal data will be free from unauthorised interception or access and except in cases of fraud by IWFM, IWFM shall not be liable to you for any losses caused by any such unauthorised interception or access.

IWFM is committed to protecting the personal data you supply to us. Information collected will be relevant to the purposes for which it is intended, and we will do our utmost to ensure that such data will be accurate and complete. Whenever personal data is obtained from you, you can request the information as to how that data will be used.

Data Retention

IWFM will retain information you have supplied to us for no longer than is necessary for the purposes of which it is being processed or as long as the law requires.

- · Financial records will be kept for six years
- · Qualification data will be kept permanently
- Member specific data will be kept for two years, to comply with the two year re-join period unless the individual is still subscribed to receive communication from us, or a legal or financial obligation requires us to retain the data.
- Individuals who have unsubscribed from all communications and who are no longer using a IWFM service or product, will be removed from the system, providing there are no other legal or financial obligations compelling us to retain the data.

Your Rights

Right to Withdraw Consent

It is IWFM's intention to give individuals as much control as is reasonably possible over how their personal data is processed by IWFM. Accordingly, you are able to amend your preferences at any time to opt-in or opt-out of communications. Please note, the right to withdraw consent does not override any legal requirements stipulating data processing.

If you wish to amend your consent preferences for receiving communications, please do so either by logging in to the website and amending your preference settings, or by following the opt-out procedures described in the relevant communication or by <u>contacting IWFM</u>.

Review, Correction, Access, Questions, and Comments

If at any time you wish to update the personal data you have provided to IWFM; wish to see IWFM's records relating to your personal data; if you have any questions or comments about IWFM's privacy practices; or if you wish to exercise your right to erasure please <u>contact IWFM</u>.

Making a Complaint

IWFM is committed to protecting your personal data as explained in this Privacy Policy, however, if you have any reason to complain, please email our Data Protection Officer on



governance@IWFM.org.uk or write to us at; Governance Department, British Institute of Facilities Management, Charringtons House, 1st Floor South, The Causeway, Bishop's Stortford, Hertfordshire, CM23 2ER. If you are not satisfied with our response, or would prefer not to approach us, you may complain directly to the Information Commissioner's Office (ICO) with details of the complaint. You may telephone them on 0303 123 1113, visit their website at https://ico.org.uk/ write to them at; Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Changes to our Privacy Policy

Any changes we may make to our Privacy Policy in the future will be posted on the website. By continuing to use our Website you will be deemed to have accepted such changes.

