

1. Privacy and your Personal Data

- 1.1. The United Kingdom Shareholders' Association Limited ("UKSA") is a company limited by guarantee and registered in England under the number 4541415. It is a not-for-profit organisation controlled by the members of the organisation and funded by membership fees and donations. The United Kingdom Shareholders' Association Limited operates under the name of "UKSA". Please refer to our [contact us](#) page for the business address and other contact information.
- 1.2. UKSA is committed to protecting the privacy of our [website](#) users and members. We promise to respect and protect your personal information and endeavour to ensure that your details are accurate and up to date. This privacy policy ("Privacy Policy") details the information that we may collect from you and how we may use that information. Please take time to read this Privacy Policy carefully.
- 1.3. This Privacy Policy applies to information collected by us or supplied by you, whether as a registered member or through use of our website or in any other way (such as by telephone). It is also intended to assist you in making informed decisions when using our website and our services. When using our website, this Privacy Policy should be read in conjunction with our [terms and conditions](#).
- 1.4. All your personal information will be held and used in accordance with the EU General Data Protection Regulation 2016/679 ("GDPR") and national laws implementing GDPR and any legislation that replaces it in whole or in part and any other legislation relating to the protection of personal data. If you wish to know what information we collect and hold about you, or to exercise any of your rights as set out in section 9 below, please write to us at the below address or by email at: uksa@uksa.org.uk.
The United Kingdom Shareholders' Association Limited
1 Bromley Lane
Chislehurst
BR7 6LH
- 1.5. UKSA is the controller of your information for the purposes of the GDPR.

2. What information do we collect on our website?

When you visit our website you may provide us with personal information as part of your membership application, donation, event registration or campaign membership, such as name, postal address, email address, telephone number, credit or debit card details (via PayPal), or there may be other personal information you choose to provide as part of any query submitted via the Contact page. You may provide us with information in a number of ways:

- a) by supplying us with the information as listed above, on an individual or joint basis, when registering to become a member of UKSA;
- b) by corresponding with us by email, in which case we may retain the content of your email messages together with your email address and our responses;
- c) through any additional personal information you choose to supply as part of any written or electronic correspondence with UKSA, participation in the UKSA members' network or attendance at an UKSA

event.

3. What information do we collect at UKSA events?

In advance of UKSA events we record from our membership database the contact details of those registered to attend and then at the event confirm all those in attendance. Event attendance information is stored securely in our membership database; all other copies of event attendance information are destroyed.

4. What information do we collect for UKSA campaigns?

When you elect to participate in one of UKSA's campaigns you consent to receiving ongoing communications from UKSA until the end of the campaign, or the point at which you choose to unsubscribe, if earlier. You may provide us with information in a number of ways:

- a) as part of the campaign records we may note your shareholding in the relevant company and the number of shares held;
- b) any other personal information that you choose to supply to us as part of ongoing shareholder campaign communications and correspondence may be retained as a record of our correspondence with you.

5. How we use your information

5.1 We will hold, use and disclose your information for our legitimate business purposes including:

- a) to keep you up to date with any important changes relating to your UKSA membership;
- b) to advise you of UKSA news, activities, shareholder campaigns, events, promotions and competitions and other information. Before we do so, you will be given an opportunity to opt out of such communications and an unsubscribe option will also be included with each communication;
- c) to answer your queries;
- d) to disclose information to regulatory or law enforcement agencies, if we are required or permitted to do so.

5.2 We may process certain sensitive personal data (known as special-category data in GDPR) where you include it in information you choose to send to us, for example if you include information about your health or your political opinions in any correspondence that you send. We have processes in place to restrict our use and disclosure of such sensitive data other than where permitted by law. Whilst not considered special-category data under GDPR we adopt a similar process for any information about your investment portfolio or financial situation that you choose to send to us.

6. The legal basis for processing your information

6.1 Under GDPR, the main grounds that we rely upon in order to process your information are the following:

- a) Consent: in some circumstances we may seek your consent to process your information in a particular way;
- b) Necessary for performance of a contract: in order to deliver the benefits of your membership, as set out on our website;
- c) Necessary for the purposes of legitimate interests: we may need to process your information for the purposes of our legitimate interests as an organisation, provided we have established that those interests are not overridden by your rights and freedoms, including your right to have your information protected. Our legitimate interests include distributing our bimonthly magazine, responding to requests and enquiries from you, optimising our website and customer experience, informing you about our shareholder campaigns and services under the terms of your membership and ensuring that our operations are conducted in an appropriate and efficient manner;

- d) Necessary for compliance with a legal obligation: we are subject to certain legal requirements which may require us to process your information. We may also be obliged by law to disclose your information to a regulatory body or law enforcement agency.

7. How we share your information

Any personal information that you submit to UKSA will be held and treated as confidential and will normally be used by UKSA only for internal purposes and for communicating with you, and otherwise as required by UK data protection legislation. In certain circumstances we will share your information with other parties. Details of those parties are set out below along with the reasons for sharing it.

- a) **Trusted third parties:** in order to provide certain services, we will share your information with third-party service providers such as IT infrastructure companies, membership payment service providers and email/print mail logistics providers. We will not share your data with any third party if it is not necessary to do so in order to provide a service for you. Note that some systems used by UKSA to communicate with you may be based outside of the European Economic Area (EEA), such as the USA, and by using such systems you accept that such transfers may take place. We have procedures in place to ensure that your information receives the same protection as if it were being processed inside the EEA, for example through the contracts or data processing agreements we have in place with third parties. If you would like further information regarding our data transfers and the steps we take to safeguard your personal information, please contact us at the address or email address set out above;
- b) **Regulatory and law enforcement agencies.** As noted above, if we receive a request from a regulatory body or law enforcement agency, and if permitted under GDPR and other laws, we may disclose certain personal information to such bodies or agencies;
- c) In relation to our shareholder campaign activity, if you have indicated that you wish such information to be in the public domain. Otherwise we will not sell, rent, lease or give away your personal information, including email addresses, to others.

8. How long we hold your information

We will only retain your information for as long as is necessary for the purpose or purposes for which we have collected it. The criteria that we use to determine retention periods will be determined by the nature of the data and the purposes for which it is kept. For example, if we receive your information when you apply for employment, we will retain your data for as long as is necessary to process your application and to maintain application statistics. We will not directly market to you. If you elect to cease your membership at any time, we will retain your details for a reasonable period prior to deleting them. In certain circumstances, once we have deleted or anonymised your data, we may need to retain parts of it (for example your email address), in order to comply with our obligations under GDPR or other legislation or for fraud detection purposes.

9. Your rights relating to your information

- 9.1. You have certain rights in relation to personal information we hold about you. Details of these rights and how to exercise them are set out below. We will require evidence of your identity before we are able to act on your request.
 - a) **Right of Access.** You have the right at any time to ask us for a copy of the information that we hold about you and to confirm the nature of the information and how it is used. Where we have good reason, and if the GDPR permits, we may refuse your request for a copy of your information or certain elements of the request. If we refuse your request or any element of it, we will state our reasons for doing so.

- b) Right of Correction or Completion. If information we hold about you is inaccurate, out of date or incomplete and requires amendment or correction, you have a right to have the data rectified, updated or completed. You can notify us by contacting us at the address or email address set out above.
- c) Right of Erasure. In certain circumstances you have the right to request that information we hold about you be erased, for example if the information is no longer necessary for the purposes for which it was collected or processed or our processing of the information is based on your consent and there are no other legal grounds on which we may process the information.
- d) Right to Object to or Restrict Processing. In certain circumstances you have the right to object to our processing of your information by contacting us at the address or email address set out above. This applies, for example, if we are processing your information on the basis of our legitimate interests and there are no compelling legitimate grounds for our processing which override your rights and interests. You also have the right to restrict our use of your information, for example in circumstances where you have challenged the accuracy of the information and during the period in which we are verifying its accuracy.
- e) Right of Data Portability. In certain instances you have a right to receive any information that we hold about you in a structured, commonly used and machine-readable format. You can request us to transmit that information to you or directly to a third-party organisation.

This right exists in respect of information that:

- you have supplied to us previously; and
- is processed by us using automated means.

While we are happy for such requests to be made, we are not able to guarantee technical compatibility with a third-party organisation's systems. We are also unable to comply with requests relating to information of others without their consent.

9.2. You can exercise any of the above rights by contacting us at the address or email address set out above. You can exercise your rights free of charge.

9.3. Most of the above rights are subject to limitations and exceptions. We will provide reasons if we are unable to comply with any request for the exercise of your rights.

10. Consent

To the extent that we are processing your information on the basis of your consent, you have the right to withdraw that consent at any time. You can do this by contacting us at the address or email address set out above.

11. How we protect your personal data

We will treat your data with the utmost care and take all appropriate steps to protect it. All transactional areas of our website are secured using 'https' technology. Sensitive data such as payment card information is handled securely by a third-party online payment specialist that complies with the requirements of GDPR and other relevant legislation to ensure your information is protected. Our membership database is securely protected with restricted password-controlled access. Our third-party IT infrastructure providers regularly monitor their systems for possible vulnerabilities and attacks.

12. Changes to our Privacy Policy

We may need to amend this Privacy Policy from time to time, for example as a result of government regulation, new technologies or other developments in data protection laws or privacy generally. If we amend our privacy policy in the future, we will advise you of any material changes or updates by email, providing we are holding your email address.

13. Complaints

If you are unhappy about our use of your information, you can contact us at the address or email address above. You are also entitled to lodge a complaint with the UK Information Commissioner's Office using any of the below contact methods:

Telephone: 0303 123 1113

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

Post:

Information Commissioner's Office
Wycliffe House
Water Lane
WILMSLOW
Cheshire
SK9 5AF

This will not affect any other legal rights or remedies that you have.

This Privacy Policy was last updated on: 26th May 2018