



## Website Privacy Policy

### 1. Who We Are

Lincolnshire Chamber of Commerce & Industry is a membership organisation registered in England and Wales (company number 00028997). Our registered office is at Commerce House, Carlton Boulevard, Lincoln, LN2 4WJ.

This privacy policy explains how we collect, use, store, and share personal data when you visit our website at [lincs-chamber.co.uk](https://lincs-chamber.co.uk), and covers our use of CCTV at our offices at Commerce House. It also explains your rights under the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 (DPA 2018), and the Data (Use and Access) Act 2025 (DUAA 2025).

We are the data controller for the personal data we collect through this website and through our office CCTV system. Our Data Protection Officer is Simon Beardsley, who can be contacted using the details in Section 12.

### 2. What Personal Data We Collect and How

#### 2.1 Data You Provide Directly

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When you complete a form, make an enquiry, register for an event, or contact us, we may collect:

- Your name and job title
- Business name and address
- Email address and telephone number
- Any information you choose to include in correspondence or enquiry forms

#### 2.2 Data Collected Automatically

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When you browse our website, we automatically collect certain technical data, including:

- Your IP address and general geographic location
- Browser type and version, and operating system
- Pages visited, time spent on pages, and navigation paths
- Referring website (if you arrived via a link)
- Date and time of your visit

This data is collected through server logs and analytics tools. It helps us understand how our website is used and improve it accordingly.

#### 2.3 Cookies and Similar Technologies

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Our website uses cookies and similar tracking technologies. A cookie is a small text file placed on your device when you visit a website. We use:

- **Essential cookies:** necessary for the website to function. These cannot be disabled without breaking core functionality.
- **Analytics cookies:** help us understand visitor behaviour and improve the website (e.g. Google Analytics). These are only set with your consent.
- **Preference cookies:** remember your settings and personalisation choices. These are only set with your consent.

When you first visit our website, you will be presented with a cookie consent banner. For more information about cookies and how to manage them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

## 2.4 CCTV at Our Offices

We operate CCTV cameras at Commerce House for security and crime prevention purposes. If you visit our offices, your image may be captured by our CCTV system. For full details of our CCTV processing, including your rights, please see Section 10.

## 3. Our Lawful Basis for Processing Your Data

Under the UK GDPR, we must have a lawful basis for each processing activity. The table below sets out the bases we rely on:

Processing Activity	Lawful Basis	Details
Responding to your enquiries	<b>Contract / Legitimate Interests</b>	Necessary to respond to requests you have initiated, or to take pre-contractual steps.
Website analytics	<b>Consent</b>	We only place analytics cookies after you give explicit consent via our cookie banner.
Sending promotional emails	<b>Consent</b>	With your consent, or where you are an existing member/contact.
Security and fraud prevention (website)	<b>Legitimate Interests</b>	To protect the security of our website and prevent fraudulent or malicious activity.
Legal compliance	<b>Legal Obligation</b>	Where we are required to process or disclose data to comply with a legal obligation.
CCTV at Commerce House (office security)	<b>Legitimate Interests</b>	Security of premises, protection of staff and assets. LIA held on file. See Section 10.

## 4. How We Use Your Personal Data

We use the personal data we collect for the following purposes:

- To respond to enquiries and provide information about our services and membership
- To process event registrations and manage member accounts
- To improve and maintain our website and digital services
- To send you information about Chamber news, events, and services — where you have consented or we have a legitimate interest to do so
- To secure our premises at Commerce House through CCTV (see Section 10)

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- To comply with our legal and regulatory obligations
  - For internal record-keeping, reporting, and administrative purposes

We will not use your personal data for any purpose incompatible with the purpose for which it was collected without first notifying you and, where required, obtaining your consent.

## 5. How Long We Keep Your Personal Data

We retain personal data for no longer than is necessary for the purpose it was collected. Our retention periods are set out in our Data Retention Policy, which is available on request. As a general guide:

- Website enquiry data: retained for up to 3 years from the date of the last contact
- Member contact data: retained for the duration of membership and up to 6 years thereafter
- Analytics and technical log data: typically retained for up to 26 months
- Cookie consent records: retained for up to 3 years as evidence of consent
- Standard CCTV footage: retained for 31 days then automatically overwritten (see Section 10 for exceptions)

Where data is retained for statistical or archival purposes, appropriate anonymisation or pseudonymisation measures will be applied.

## 6. Sharing and Disclosing Your Personal Data

We do not sell your personal data. We may share your data in the following limited circumstances:

### 6.1 Service Providers and Data Processors

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We use carefully selected third-party suppliers to operate our website and deliver services (e.g. website hosting, email delivery, analytics platforms). These parties process data on our behalf under written data processing agreements and are not permitted to use your data for their own purposes.

### 6.2 Legal and Regulatory Disclosure

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We may disclose personal data where required by law, court order, or regulatory authority, or where necessary to protect our legitimate legal interests or the safety of others. This includes disclosure of CCTV footage to Lincolnshire Police where required in connection with a crime at or near our premises.

### 6.3 Business Transfers

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In the event of a merger, acquisition, or transfer of our business operations, personal data may be transferred as part of that transaction. We will notify affected individuals and ensure appropriate protections are in place.

### 6.4 With Your Consent

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We will share your data with third parties for marketing or other purposes only with your explicit consent, which you may withdraw at any time.

## 7. International Data Transfers

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We aim to keep your personal data within the UK. Where we use third-party services that transfer data outside the UK, we ensure appropriate safeguards are in place — such as the International Data Transfer Agreement (IDTA), UK adequacy regulations, or equivalent protections as recognised under the DUAA 2025.

You may request details of the specific safeguards applied to any international transfer by contacting our Data Protection Officer.

## 8. Your Rights

Under the UK GDPR and DUAA 2025, you have the following rights in relation to your personal data. These rights are not absolute and may be subject to exemptions, but we will always respond to requests within one calendar month (or notify you if we need longer):

Right	Summary
<b>Right to be Informed</b>	You have the right to clear, transparent information about how we use your data. This privacy policy fulfils that obligation.
<b>Right of Access</b>	You may request a copy of the personal data we hold about you (a Subject Access Request). We will respond within one month.
<b>Right to Rectification</b>	If any data we hold about you is inaccurate or incomplete, you have the right to ask us to correct it.
<b>Right to Erasure</b>	You may ask us to delete your personal data where there is no compelling reason for us to continue holding it. This right is not absolute.
<b>Right to Restrict Processing</b>	You may ask us to pause processing of your data in certain circumstances.
<b>Right to Data Portability</b>	Where processing is based on consent or contract and carried out by automated means, you have the right to receive your data in a structured, machine-readable format.
<b>Right to Object</b>	You have the right to object to processing based on legitimate interests or for direct marketing purposes. For direct marketing, this right is absolute.
<b>Rights re Automated Decisions</b>	You have the right not to be subject to solely automated decision-making that produces legal or similarly significant effects, including decisions made using AI or machine learning systems (as reinforced by DUAA 2025).

To exercise any of these rights, please contact us using the details in Section 12. If you are not satisfied with our response, you have the right to lodge a complaint with the Information Commissioner's Office (ICO) at [ico.org.uk](https://ico.org.uk) or by calling 0303 123 1113.

## 9. Participation in the Stopwatch Crime Prevention Programme

Lincolnshire Chamber of Commerce & Industry is a partner in the Stopwatch programme, a crime prevention initiative operated in partnership with Lincolnshire Police. The purpose of this programme is to prevent, detect, and investigate crime affecting businesses and the public in the Lincoln city centre area.

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As part of this partnership, the Chamber may share and process personal data — including CCTV images and the names of individuals — with Lincolnshire Police and other Stopwatch partners where this is necessary for the prevention, detection, or investigation of crime. This is a distinct processing activity from the Chamber's own office CCTV system (covered in Section 10).

This processing is carried out under the following legal bases:

- **Legitimate Interests (Article 6(1) (f))** We have a legitimate interest in processing data to ensure the prevention of crime and participating in the stop watch prevention programme.
- **Schedule 1, Part 2, Paragraph 10 of the Data Protection Act 2018 — Preventing or Detecting Unlawful Acts:** Where processing under this programme involves special category data (for example, images that may reveal racial or ethnic origin), we rely on this condition as the Schedule 1 substantial public interest condition.

The types of personal data processed under this programme may include CCTV footage and still images, names, physical descriptions, and other identifying information relating to individuals suspected of, or in connection with, criminal activity in the Lincoln area.

Data processed under the Stopwatch programme will only be shared with Lincolnshire Police and participating Stopwatch member businesses. It will not be used for any other purpose, retained longer than necessary for the crime prevention purpose, or disclosed to any third party outside the programme without a separate legal basis. We maintain records of all disclosures made under this programme in accordance with our accountability obligations under UK GDPR.

Please note that, due to the nature of crime prevention processing, your right to object and certain other data subject rights may be restricted where exercising them would be likely to prejudice the prevention or detection of crime. If you have queries about data processed under this programme, please contact our Data Protection Officer using the details in Section 12.

## 10. CCTV at Our Offices

### 10.1 Overview

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We operate CCTV cameras at our offices at Commerce House, Carlton Boulevard, Lincoln. This is an office security system, separate from any CCTV images that may be shared through the Stopwatch programme (see Section 9). If you visit our offices, your image may be recorded.

### 10.2 Purposes

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Our office CCTV is operated solely for the following purposes:

- Prevention and deterrence of crime, including theft and criminal damage
- Detection of crime occurring on or in the immediate vicinity of Commerce House
- Protection of the safety and security of staff, members, and visitors
- Protection of the Chamber's physical assets and property
- Evidence gathering in connection with specific incidents, insurance claims, or legal proceedings

### 10.3 Lawful Basis

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Our office CCTV is operated on the basis of Legitimate Interests (Article 6(1)(f) UK GDPR). We have conducted a Legitimate Interests Assessment (LIA), which is held on file by the Data Protection Officer. The LIA concludes that our security interests in operating CCTV at Commerce House are proportionate and are not overridden by the rights and freedoms of individuals whose images are captured.

## 10.4 Signage

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All areas monitored by CCTV at Commerce House are clearly signposted before you enter the monitored area. Signs identify the Chamber as data controller and provide DPO contact details. We do not operate covert CCTV.

## 10.5 Retention

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Standard CCTV footage is retained for 31 days and then automatically overwritten. Footage flagged in connection with a specific incident may be retained for up to 3 months. Footage relevant to police disclosure or legal proceedings may be retained for the duration of those proceedings plus 6 years. Full details are set out in our CCTV Policy and Data Retention Policy.

## 10.6 Access and Disclosure

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Access to CCTV footage is restricted to the Data Protection Officer and specifically authorised staff. All access is logged. Footage is only disclosed to third parties — including Lincolnshire Police — on documented lawful grounds. A disclosure log is maintained by the DPO.

## 10.7 Your Rights in Relation to CCTV

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If you believe you appear in CCTV footage held by the Chamber, you may submit a Subject Access Request to the Data Protection Officer. We will respond within one calendar month. Where footage also captures third parties, those individuals' images will be redacted before disclosure to you. The right of access may be restricted where disclosure would prejudice crime prevention or detection activities.

Our full CCTV Policy is available on request from the Data Protection Officer.

## 11. Security of Your Personal Data

We take the security of your personal data seriously. We have implemented appropriate technical and organisational measures to protect your data against unauthorised access, loss, destruction, or alteration. These measures include:

- Encryption of personal data in transit (TLS 1.2 or higher) and at rest
- Access controls ensuring only authorised personnel can access personal data
- Regular security assessments of our web infrastructure
- Physical security controls at Commerce House, including access-restricted CCTV systems
- Staff training on data protection and information security obligations
- Incident response procedures in the event of a data breach

In the event of a personal data breach that is likely to result in a risk to your rights and freedoms, we will notify the ICO within 72 hours of becoming aware of the breach. Where the risk is high, we will also notify you directly without undue delay.

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## 12. How to Contact Us

If you have any questions about this privacy policy, wish to exercise your rights, or want to raise a concern about how we handle your personal data — including in relation to CCTV — please contact our Data Protection Officer:

**Name:** Simon Beardsley, Data Protection Officer

**Organisation:** Lincolnshire Chamber of Commerce & Industry

**Address:** Commerce House, Carlton Boulevard, Lincoln, LN2 4WJ

**Telephone:** 01522 523333

**Email:** [enquiries@lincs-chamber.co.uk](mailto:enquiries@lincs-chamber.co.uk)

We aim to respond to all requests and enquiries within 5 working days, and within the statutory one-month period for formal rights requests.

## 13. Changes to This Privacy Policy

We review this privacy policy at least annually and whenever there is a material change to our processing activities or the applicable law. The current version will always be available on our website at [lincs-chamber.co.uk/privacy](https://lincs-chamber.co.uk/privacy).

This privacy policy was updated in March 2026

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