

## Privacy Policy

### Introduction

This Website is operated by the Corporate Benchmarking Services (Scotland) Limited (“we”, “us” and “our” below). We are committed to a policy of protecting the rights and privacy of individuals in accordance with the General Data Protection Regulation (GDPR) and domestic UK data protection legislation (“the Data Protection Legislation”). This statement sets out our privacy policy and explains what we do with the personal information that we collect from our users. Please read the following to understand our views and practices regarding personal information. If you have any questions or concerns regarding this statement, you should contact us using the details given at the end of this statement.

Please note that this policy applies only to our website and not to the web sites of other organisations to which we may provide links. We are not responsible for the privacy policies or practices of such third party sites and you should make your own enquiries in respect of them.

### Definitions

In this privacy policy:-

- references to “we”, “our” and “us” are to Corporate Benchmarking Services (Scotland) Limited, a company incorporated in Scotland (registered number SC218194) and having our registered office at 39 Regent Street, Edinburgh EH15 2AY;
- “User” means you, anyone who accesses or uses the website in any way;
- “Member” means an individual who uses the website on behalf of a Subscriber;
- “Subscriber” means a corporate entity or other organisation which is not an individual and which is or becomes a member of Sheiiba;
- “Sheiiba” is the Safety, Health and Environmental Intra Industry Benchmarking resource and
- “Website” means this, the Sheiiba website [www.sheiiba.com](http://www.sheiiba.com).

### Collection of your information

We will collect personal information if you apply for membership on behalf of a Subscriber, or if you make an enquiry. The personal information which you may provide can include your name, work address, mailing address, email address, employing organisation, current job title and/or level.

We may also collect personal information from you when you access the Website for auditing usage of the site and for general administration purposes. The information we may collect will comprise some or all of the following: your name, address, telephone, email address, IP address and post code.

We may in some cases collect information about you that may not be personal data. For example the type of Internet browser you are using, the type of computer operating system you are using, and the domain name of a website from which you linked to our website.

### **Use of your information**

We will use your personal information for membership administration if you apply for membership on behalf of a Subscriber. Additionally, anyone using our website is allowed restricted access to our Subscribers' services. In some cases, the nature of these services means that we require personal details from you to enable you to use those services. In the course of using the services you may also be given the option to supply information or documents. If you choose to provide personal details, information or documents they will be used to provide the members' services on the same terms as set out for Members.

The following are examples of the specific purposes for which we may also use your personal information:-

- to help us identify you and the membership your organisation holds with us, both for our own purposes and for approved providers who need to verify membership;
- to enable you to receive the service you have requested; if you are using the Website on behalf of a member, to administer the membership record, inform you of events, provide services and fulfil our obligations to the Subscriber (including billing);
- to communicate with you generally;
- to know your preferences and use of email updates, recorded by emails we send you (if you select to receive our newsletter);
- for research, survey completion and profiling;
- statistical analysis and behavioural analysis;
- to improve the services we provide;
- to detect, investigate and prevent activity we think may be potentially illegal, unlawful or harmful, including:
  - fraud prevention and detection (including credit scoring and credit checking where we have sought your consent);

- to enforce our Privacy Policy, Terms and Conditions or Acceptable Use Policy;
- for management and auditing of our business operations including accounting
- to comply with legal and regulatory obligations, requirements and guidance

### **Newsletter**

We would also like to email our Sheiiba newsletter to you. This includes news regarding our website which may be of interest to its users. If you wish to receive this, please tick the check box when entering your personal details. We have a firm commitment to protecting your privacy and security as our user. You can unsubscribe from the newsletter at any time by contacting us at the address below.

### **Sharing information**

The value of our members' services depends on the sharing of information between users of the website. Personal details provided by members of the website are viewable by other users of the site via our members list and through our members' services. Any information or documents supplied by you in relation to our members' services will also be accessible by other users of the site and attributed to you unless we have provided you with an option to restrict access to the information provided by you or to withhold your identity. Where these options have been provided we will respect your wishes and will not share information or identify you as the source of information without your permission. If you supply us with an e-mail address, information relating to our members' services may sometimes be sent to you at that address. Information provided by you in relation to our members' services may also be sent to other users of the members' services by e-mail.

### **Retaining your personal information**

Unless we explain otherwise to you, we'll hold your personal information based on the following criteria:

- Subscriber's data (including individuals' personal data) will be held for the term of the Subscriber's active membership as requested by the Member or the Subscriber; and/or
- For as long as we have reasonable business needs, such as managing our relationship with you and managing our operations; and/or

**Third parties**

We may share your personal information with third parties but only in the strictly limited circumstances set out below.

- In certain circumstances we may share your personal information with affiliated companies and service providers who perform functions on our behalf such as our internet service provider. These third parties must at all times provide the same levels of security for your personal information as us and will be bound by a legal agreement to keep your personal information private and secure.
- We may also supply your personal information to government bodies and law enforcement agencies but only: if we are required to do so by the requirements of any applicable law; if in our good faith judgment, such action is reasonably necessary to comply with legal process; to respond to any claims or actions; or to protect our rights or those of our customers and the public.

**Cookies**

This Website uses a Google Universal Analytics tag, accessed by Google's secure servers over HTTPS, with urchin code UA-32645654-1. It sets a cookie to the computers of all users of the Website, however only captures page view information. It does not collect information from your computer and does not obtain or try to obtain any Personal Identifiable Information or login details.

This Website also uses what is known as a session, also sometimes called a transient cookie. The session aids the functionality of the Website by keeping track of your movement from page to page so you don't get asked for the same information you've already given. So it allows you to proceed through many pages of the Website quickly and easily without having to authenticate or reprocess each new area you visit. Without a session cookie, every time you open a new web page the server where that page is stored will treat you like a completely new visitor.

Our session is stored in temporary memory and is erased when you log out of Sheiiba and close your browser or clear your web browser history. You can choose to accept or reject session cookies by changing the settings in your browser but if you reject, your ease of use of the Website is likely to be impaired. By continuing to use the Website you will be deemed to have accepted the use of our session.

**Security**

We are committed to protecting the privacy of your personal data. We use appropriate standards of technology and operational security to protect personal information including a secure server and network firewall connection. Operationally, access to personal information is restricted to authorised personnel who are under a duty to maintain the confidentiality and security of such information.

**Internet and Data Storage**

The Internet is inherently insecure. Personal information submitted by means of the Internet may be vulnerable to unauthorised access by third parties. Submission of personal information using the Internet is at your own

risk. We will take reasonable and appropriate technical measures to ensure that your personal information is stored in a secure manner. However, we shall have no liability for disclosure of data due to errors in transmission or the fraudulent, negligent or other illegal acts of a third party, such as 'Hacking'. Any transmission of personal information on or through the use of our website is at your own risk

### **Transmission of Data Overseas**

In certain circumstances, we may transfer your personal information to countries outside the European Economic Area. This may include circumstances where we use service providers who are based outside the EEA or who use "cloud" infrastructure which means that their servers are based all over the world. Where we transfer your information to companies outside the EEA, we will make sure it's protected in a manner that is consistent with how your information will be protected by us. This can be done in a number of different ways for instance:

- The country that we send the information to might be approved by the European Commission.
- The recipient company might have signed a contract obliging them to protect your information.
- The recipient is located in the US and is a certified member of the EU-US Privacy Shield scheme.

In other circumstances the law may permit us to otherwise transfer your information outside the EEA. In all cases however, we will ensure that any transfer of your information is compliant with the Data Protection Legislation.

### **Your rights**

You have a number of legal rights in relation to the information that we hold about you, including:

- *Right to access:* You have the right to request access to your personal data held by us. Requests are to be made in writing, electronically and information will be provided in a commonly used electronic format. Requests will be handled within one month of receipt of the request, and free of charge with the exception of where requests are manifestly unfounded or excessive we hold the right to charge a reasonable fee taking into account the administrative costs of providing the information. More information can be found at <https://ico.org.uk/for-the-public/personal-information/>.

- *Right to rectification:* You have the right to have personal data rectified if inaccurate or incomplete. Where the personal data in question has been disclosed to a third party, they will be made aware of the rectification where possible. Requests are to be made in writing, electronically, and will be handled within one month of receipt of the request.
  
- *Right to erasure:* You have the right to request the deletion or removal of personal data in the following circumstances:
  - Where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed.
  - When you withdraw consent.
  - When you object to the processing and there is no overriding legitimate interest for continuing the processing.
  - The personal data was unlawfully processed (i.e. otherwise in breach of the GDPR).
  - The personal data has to be erased in order to comply with a legal obligation.

This does not provide an absolute “Right to be forgotten”. Where the personal data in question has been disclosed to a third party, we will inform them about the erasure of the personal data, unless it is impossible or involves disproportionate effort to do so. Personal data will be erased by removal from our internal and cloud servers.

- *Right to restrict processing:* You have a right to ‘block’ or suppress processing of personal data if you contest its accuracy; have objected to the processing; processing is unlawful and you oppose erasure; we no longer need the personal data but you require the data to establish, exercise or defend a legal claim. Where the personal data in question has been disclosed to a third party, we will inform them about the restriction on processing of the data, unless it is impossible or involves disproportionate effort to do so.

- *Right to data portability:* You have the right to obtain and reuse your personal data for your own purposes. Requests are to be made in writing, electronically, and will be handled within one month of receipt of the request.
- *Right to object:* You have the right to object to processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling); direct marketing (including profiling); and processing for purposes of scientific/historical research and statistics. Requests will be dealt with by immediate effect with no right for refusal.

You also have the right to make a complaint with the Information Commissioner at [www.ico.org.uk](http://www.ico.org.uk) if you think that any of your rights have been infringed by us.

All requests will be dealt with on their own merit, and in accordance with the Data Protection Legislation guidance.

Should a data breach occur, we have compliant procedures in place to investigate and report the matter to the Individual. In the event of a breach, it will be reported to you within 72 hours of discovery. A record of any breaches will be kept by the company.

You can exercise your rights by contacting us using the details set out in the "Contact Address" section below.

#### **Changes to the privacy policy**

We reserve the right to modify or amend this privacy policy at any time and for any reason. Details of any changes will be posted at the top of the privacy policy web page.

#### **Contact Address:**

Sheiiba  
Corporate Benchmarking Services (Scotland) Ltd  
PO Box 13881  
Edinburgh  
Scotland  
UK  
EH15 1ZQ

Email: [info@sheiiba.com](mailto:info@sheiiba.com)