

SPRA PRIVACY POLICY

Last Revised October 2022

It is the policy of the Single Ply Roofing Association (“SPRA”) to operate strict privacy arrangements to serve the interests of our members, associates and those visiting our website and using our online services and digital applications.

Use of information

This Privacy Policy applies to any personal data or information we collect from:

- members
- clients
- trainees on SPRA training courses
- visitors to our website and any associated microsites;
- complainants and other individuals in relation to data protection or freedom of information complaint or enquiry;
- people who use our services, (for example those who subscribe to our alerts, articles or request a publication from us);
- job applicants and any current and former consultants or employees; and
- users of our online tools and services, reports, databases and other digital systems.

SPRA seeks to comply with the Data Protection Act 1998 and subsequent legislation. We follow strict procedures in the storage and disclosure of personal information so as to prevent unauthorised access by third parties.

Why we collect data

SPRA may change this policy periodically. You should check from time-to-time to ensure that you are happy with any changes.

Why we collect your information

The information which you may provide to us, along with other information relating to you, will be held by SPRA and used for the following purposes, and under specific lawful basis:

- where processing is necessary for the performance of a contract or service with you or your employer, or to take steps to enter into a contract;
- where processing is necessary for compliance with a legal obligation;
- where it is necessary for the purposes of SPRA’s legitimate business interests, except where such interests are overridden by the interests, rights or freedoms of the data subject (the individual whom particular personal data is about);
- if we process special categories of data, we do so only with the explicit consent of the data subject, unless reliance on consent is prohibited by United Kingdom or other applicable law, or where processing is necessary for carrying out obligations under employment, or a collective agreement; and
- where none of the above applies, or it is deemed necessary, we shall only process your data with your explicit consent, which has been positively and freely given.

Types of data

We may collect the following information:

- name, job title, company, and/or information required in order carry out services as per our contract with you (or your employer);
- financial information (specific to the services being provided);
- contact information, including email address;
- demographic information, such as postcode; and
- other information relevant to delivery of our services

Our members

Our members' information, data and intellectual property remains confidential and is only dealt with in the strictest of confidence and security in accordance with SPRA's standard terms and conditions.

Member and other individuals' information shall only ever be accessed internally on a "need-to-know" basis by authorised personnel, unless the individual has consented to the transfer of their data to specific third party organisations to allow processing of training and/or gaining qualifications & certifications.

We retain personal information only for as long as necessary and as required by law. This means that information may be retained for up to seven years. We may retain de-personalised information about organisations for as long as is necessary, but no individuals are identifiable from that data.

The legal basis for processing this data is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

Use of third parties

As part of our services to our clients, we may use some third-party support or software (for example, email servers and accounting systems). Before contracting with any supplier, we request detailed information on their data protection policies and processes in order to ensure that your data will be suitably protected when processed by them, and where their data is stored.

The legal basis for processing this data is both our legitimate business interests, namely the proper administration of our business, and the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

Visitors to our website

If you browse, read pages, or download information from our website, we will gather and store certain limited information about your visit. This information collected or stored is used by us only for the purpose of improving the content of our web services and to help us understand how people are using our services.

When someone visits our website, we use a third-party service, such as Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. This includes your computers' or digital device's IP address, the type and version of browser and operating system you use, your internet domain and, if you visited via a link from another website, the URL of the linking

page. We do this to perform technical diagnosis of our website's performance and to analyse data traffic for each page. This information is only processed in a way which does not identify anyone. We do not make any attempt to find out the identities of those visiting our websites. The information generated about your use of the website (including your IP address) will be transmitted to and stored by the third-party service on their servers (and in the case of Google, on servers in the United States). If you do not wish for your data to be processed this way, please do not enter our website.

This information is collected on our behalf by our website service providers. We take steps to ensure that the service providers we use for this have adequate procedures and policies in place to protect any data collected on our behalf.

The legal basis for processing this data is our legitimate business interests, namely monitoring and improving our website and services.

Use of cookies by SPRA

Our websites collect data which allows us to recognise you, your preferences and how you use our websites. This information is collected by 'cookies' - small strings of data stored in your device's temporary memory as text files. Some cookies are deleted when you close your browser, but others are persistent and are not automatically deleted. Cookies may store your computer's IP address, but do not store your email address or other such personal information.

We may use cookies to recognise you and your preferences so that we can tailor the website to match your interests and preferences.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

For further information, visit www.aboutcookies.org or www.allaboutcookies.com to understand how to remove cookies from your browser or not to accept them. However, in some cases, some of our website features may not function as a result.

People who use our services

We hold the details of the people who have requested our services in order to provide such services. However, we only use these details to provide the service the person has requested and for other closely-related purposes. For example, we might use information about people who have requested a publication to carry out a survey to find out if they are happy with the level of service they received.

Where we do collect personally identifiable information through our website, we will be transparent about this. We will make it clear when we collect personal information and will explain what we intend to do with it. When people do subscribe to our services, they can cancel their subscription at any time and are given an easy way of doing this.

Alerts and articles

To those who consent and subscribe to our mailing list (including our clients) and/or our online databases and tools, we send out alerts, details of upcoming events, and other useful local updates and information relating to our industry. We use a third-party provider for alerts and articles. We gather statistics around email opening and clicks using the industry standard technologies including clear gifs to help us monitor and improve our alerts and articles.

Emails

Any email sent to us, including attachments, may be monitored and used by us for reasons of security and compliance with our internal policies and procedures. Email monitoring or blocking software may also be used. You have a responsibility to ensure that any email you send to us is within the bounds of the law.

If you send us a direct message or email via our website, this information may be managed and temporarily stored by a third party service provider. It will not be shared with any other organisations or third parties.

Social media

We manage our social media interactions via platforms such as Twitter and LinkedIn. If you send us a private or direct message via social media the message may be stored by the social media website as per their privacy policy. It will not be shared with any other organisations.

Users of our online training module and systems

On registering to access our online members area, application forms, training module and tools, you will be required to consent to our terms of use and privacy terms. We may process your account data, including your name, email address, company name (if any), job title (if any), and telephone number. This information will not be disclosed to any third party except in order to manage, maintain or update the system.

Depending on the level of access, we may process information relating to transactions, including the purchase of subscription services and event tickets that you enter into with us. The transaction data may include your contact details, your card/bank account details and the transaction details. The transaction data may be processed for the purpose of supplying the purchased services and keeping proper records of those transactions. The legal basis for processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract, and our legitimate interests, namely, our interests in the proper administration of our website, database and business.

All financial transactions relating to our services are handled internally by our accounts team or through an online third party provider. The data is only processed to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with queries relating to such payments.

Other websites

Our website contains links to other websites. This Privacy Policy only applies to this website. SPRA is not responsible for the privacy practices or the content of third party websites linked to our website.

When you link to another website, you should read and accept all their own applicable privacy policies before proceeding.

Job applicants, current and former consultants to SPRA and SPRA employees

When individuals apply to work with or for SPRA we will only use the information they supply to us to process their application and to monitor recruitment statistics. Where we want to disclose information to a third party, for example where we want to take up a reference or obtain further disclosure (such as from the Criminal Records Bureau), we will not do so without informing the individual first, unless the disclosure is required by law.

Information about unsuccessful candidates will be held for a maximum of 12 months following completion of the recruitment process; it will then be destroyed or deleted. We retain de-personalised statistical information about applicants to help inform our recruitment activities, but no individuals are identifiable from that data.

On employing an individual or contracting a consultant, a file will be compiled relating to their employment or contract with SPRA. This information will be kept secure and only used for purposes directly relevant to that person's employment or contract, and only accessible to those with the correct and appropriate level of authority within SPRA.

Information for our current and former employees and consultants will be stored securely and kept in accordance with our retention policy.

Trainees, learners, assessors and other individuals related to SPRA training initiatives

Where individuals have supplied personal data in relation to any of our training initiatives, or those of our members which are audited and approved by SPRA, the data will only be used internally or shared with the Construction Industry Training Board (CITB) the Roofing Industry Alliance (RIA) and/or the Construction Site Certification Scheme (CSCS) for evaluation, audit and to support the payment of grants where applicable.

Security and performance

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online and in completing our services to our clients.

We may process any personal data identified in this Policy where it is deemed necessary for the purposes of maintaining insurance coverage, managing risks, obtaining professional advice, or establishing, exercising or defending legal claims, we do this for the proper protection of our business. We may also process such data where processing is required in order to comply with a legal obligation in order to protect your or another person's vital interests.

Access to your information and correction

SPRA tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request' under the Data Protection Act 1998 and subsequent legislation. If we do hold information about you, we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form.

To make a request to SPRA for any personal information we may hold, you need to put the request in writing addressing it to our GDPR Leader at our registered office or emailing it to the address provided below.

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

You have specific rights under data protection legislation; these are:

- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erase;
- the right to restrict processing;
- the right to data portability;
- the right to object; and
- rights in relation to automated decision making and profiling.

If for any reason we are unable to disclose your personal information, we will set out such reasons for any refusal. We may request that you provide further information and identification to enable us to comply with your request.

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so.

You may request details of personal information which we hold about you under the Data Protection Act 1998. If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at the address below. We will promptly correct any information found to be incorrect.

Complaints

SPRA tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this matter very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

This privacy policy was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of SPRA's collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below.

When we receive a complaint from a person we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to process the complaint and to check on the level of service we provide. We do compile and publish statistics showing information like the number of complaints we receive, but not in a form which identifies anyone.

We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant doesn't want information identifying them to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for two years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Similarly, where enquiries are submitted to us we will only use the information supplied to us to deal with the enquiry and any subsequent issues and to check on the level of service we provide.

Contact information

If you have any concerns about how we use your personal information, questions about this policy, or wish to request access or changes to your information, please contact our GDPR Leader at the following address:

By Post: GDPR Leader

Single Ply Roofing Association, Roofing House, 31 Worship Street, London, EC2A2DY, United Kingdom

Email: enquiries@spra.co.uk (please include "Data Protection" in the subject line of the email).

Further information

You can find detailed information about your rights under UK Data Protection legislation on the UK Information Commissioner's website: <http://www.ico.gov.uk>

This policy shall be reviewed annually, and updated as necessary. We reserve the right to modify or otherwise update this policy and any changes will be posted on our website.

This SPRA Privacy Policy is freely available to download from the SPRA website, www.spra.co.uk.