# Co-operative West Midlands Privacy Policy

Last updated: June 2025

#### 1. About this document

This privacy policy sets out how we protect and manage any personal identifiable information and/or data that is held as a result of any dealings you may have with Co-operative West Midlands in compliance with GDPR.

Personal information (which may also be called personal data), means any information about an individual from which that individual can be identified, whether directly or indirectly. It does not include data where personally identifying elements have been removed (anonymous data).

Co-operative West Midlands is the representative body of cooperative enterprise in the region.

Co-operative West Midlands is committed to protecting data and respecting the privacy of any persons we deal with. This Privacy Policy explains what data we collect, why and what we do with it. Should we ask you to provide certain information by which you can be identified, then you can be assured that it will only be used in accordance with this privacy policy. We will never share any information you provide with any third parties unless we are under a legal obligation to do so.

Personal data such as name, address, email address, phone number, or financial data such as account number and sort code for direct debit donations, are kept on a secure server.

Co-operative West Midlands complies with legal, regulatory and professional obligations, and in-so-doing must retain certain records to demonstrate compliance with those obligations. Those records may contain personal data.

# 2. Security

Co-operative West Midlands is committed to ensuring that your data, including any personal identifiable 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.

## 3. Visitors to our website

When someone visits <a href="https://westmidlands.coop/">https://westmidlands.coop/</a> we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the numbers of visitors to various parts of the site. This is to help us improve our website experience for you the user as well as our services we offer to the market.

This information is processed in a way that does not identify anyone. If we do want to collect personally identifiable information through our website, we will be up front about this and clearly state what we will use it for.

#### 3.1 Use of cookies

Our website uses cookies, as almost all websites do, to help provide you with the best experience we can. Cookies are small text files that are placed on your computer or mobile phone when you browse websites. We do not use cookies to:

- Collect any personally identifiable information (without your express permission)
- Collect any sensitive information (without your express permission)
- Pass personally identifiable information to third parties

#### Google states:

"Like many services, Google Analytics uses first-party cookies to report on visitor interactions. These cookies are used to store non-personally identifiable information, such as what time the current visit occurred, whether the visitor has been to the site before, and what site referred the visitor to the web page. Browsers do not share first-party cookies across domains."

If you are not comfortable with cookies being used in this way, you can use your web browser's privacy features to disable them. If you don't disable them and continue to view the Cooperatives West Midlands website you are consenting to the use of cookies.

#### 3.2 Links to other websites

Our website may contain links to other websites of interest. Please note that once you leave our website we have no control over other websites and cannot be held accountable for any aspect of data privacy and protection.

## 4. Newsletter Subscribers

If you sign up for any Co-operative West Midlands e-newsletters we will only collect the following information:

- Full name
- Email address
- Whether you are a member of an organisation or company.

We process this personal data solely for the purposes of delivering our e-newsletters and on the basis that we have your consent to do so, which you provide when you sign up for a newsletter. You can withdraw your consent at any time by clicking the "unsubscribe" link in any of our emails. Mailing lists are managed in-house on our website; we will periodically clean the mailing lists to ensure they are up to date.

## 5. Social media

We use third party providers LinkedIn, Instagram, YouTube and Facebook to manage our social media interactions and they all have their own privacy policies.

# 6. Job applicants, current and former employees

Co-operative West Midlands is the data controller for all the information you provide during the processes of recruitment and employment.

We will only collect the information we need including to fulfil legal obligations to progress and assess your application during the various recruitment stages; this may include from third parties such as recruitment agencies.

This will only be used to progress and assess your application and we do this on the basis that it is necessary to take steps at your request to decide whether to enter into a contract with you.

## 6.1 Retention of personal information

If you are not successful in your application, your information (including third party referee details) will be destroyed 6 months after the end of the recruitment process.

### 7. Clients and Business Contacts

Co-operative West Midlands processes personal data about individuals through emails, by phone or electronic calendar invites. We also hold information on our secure website and built-in Constituent Relationship Management system, which is password protected and only accessible only to trusted users and administrative members of our team.

We process personal data solely for the purposes of our business contract and on the basis that it is in our legitimate interests to do so (i.e. to ensure that we can manage our relationship with them). This information will be retained securely for as long as necessary for the purposes set out for that business contract.

Personal Data, such as emails or phone numbers, will never be given or shared with 3rd parties without express permission and only then will it be given if there is a business case for doing so.

We have in place procedures and measures to manage and protect commercially confidential information we are required to handle through delivering our services. These are normally dealt with through specific contractual agreements as required.

# 8. Photos and video footage

Sometimes photos or videos taken by Co-operative West Midlands will include members of the public participating in our actions and events. We do our best to ensure that anyone who would rather not be photographed or filmed is not included in the footage.

# 9. Your rights with regards to Personal Information

You may request details of personal information which we hold about you by writing to or emailing us.

Address: The Transfer, The Old Print Works, 498-506 Moseley Road, Birmingham, B12 9AH.

Email: contact@westmidlands.coop

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 above address. We will promptly correct any information found to be incorrect.

#### You also have the following rights in relation to your personal data:

- A right to ask us to erase personal data in some circumstances.
- A right to ask for an electronic copy of some personal data to transfer it to another data controller.
- A right to object to the processing of your personal data where we process it on the basis of our legitimate interests.
- A right to ask us to restrict the processing of your personal data in some circumstances.
- A right to ask us to erase your personal data in some circumstances.
- A right to opt out of direct marketing.
- A right not to be subject to wholly automated decisions that have significant effects on you.

# 10. Sharing of Personal Information

We will be required to share your personal data with third parties in some circumstances. These include:

- third party service providers, such as IT suppliers, hosting providers and web developers, for the purposes of allowing them to perform their services for us;
- prospective or actual purchasers of all or any part of our business;
- law enforcement agencies, regulators and government bodies where required and where permitted by laws.

Apart from this, we will not share your information without your consent.

# 11. Questions and complaints

If you have any questions about the processing of your personal data, please get in touch.

#### Contact us

Address: The Transfer, The Old Print Works, 498-506 Moseley Road, Birmingham, B12 9AH.

#### Email: contact@westmidlands.coop

If you are not happy with how we have processed your personal data, you have the right to complain to the Information Commissioner's Office. Please see www.ico.org.uk for more information on how to do this.

Co-operative West Midlands may change this policy from time to time and update this page. You should check this page from time to time to ensure that you are happy with any changes. This policy is effective from 17<sup>th</sup> June 2025.