

# Privacy Notice

This document refers to personal data, which is defined as information concerning any living person (a natural person who hereafter will be called the Data Subject) that is not already in the public domain.

The Data Protection Act 2018 seeks to protect and enhance the rights of data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data. It should be noted that the Act does not apply to information already in the public domain.

SYB Group Ltd is pleased to provide the following Privacy Notice:

## Personal Data

This Privacy Notice provides you with clear information as to how we process your personal data. We are obliged to use your information in line with all applicable laws. We do so in a manner that is fair by using your information in a way that you would reasonably expect when providing our services.

SYB Group Ltd (the company) uses the information collected from you to provide membership, education, training and consultancy services, make telephone contact and to email you marketing information which the company believes may be of interest to you and your business. In you making initial contact you consent to the Institute maintaining a marketing dialogue with you until you either opt out (which you can do at any stage) or we decide to desist in promoting our services. The Chartered Institute will also act on behalf of its clients in the capacity of data processor. When working exclusively as a data processor, the company will be acting on the instruction of its client, and will work hard to ensure that the client is fully compliant.

Some personal data may be collected about you from the forms and surveys you complete, from records of our correspondence and phone calls and details of your visits to our websites, including but not limited to personally identifying information like Internet Protocol (IP) addresses. The Institute may from time to time use such information to identify its visitors. The company may also collect statistics about the behaviour of visitors to its websites.

We partner with Microsoft Clarity and Microsoft Advertising to capture how you use and interact with our website through behavioral metrics, heatmaps, and session replay to improve and market our products/services. Website usage data is captured using first and third-party cookies and other tracking technologies to determine the popularity of products/services and online activity. Additionally, we use this information for site optimization, fraud/security purposes, and advertising. For more information about how Microsoft collects and uses your data, visit the [Microsoft Privacy Statement](#).

The company website use cookies, which is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. Our websites use cookies to help the company identify and track visitors and their website access preferences. Website visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using the Chartered website. - [more information about cookies](#)

Any information the company holds about you and your business encompasses all the details we hold about you and any sales transactions including any third-party information we have obtained about you from public sources and our own suppliers such as credit referencing agencies.

SYB Group Ltd will only collect the information needed so that it can provide you with membership, education, training, consulting and marketing services, the company does not sell or broker your data.

## **Legal basis for processing any personal data**

To meet the Institutes contractual obligations to its members, students and clients and to also respond to marketing enquiries.

### **Legitimate interests pursued by SYB Group Ltd and/or its clients**

To carry out the charitable objects as registered with the Charity Commission, namely:

*A) To promote industry and commerce and particularly international trade in goods and services of all kinds.*

*B) To examine research and analyse problems connected with industry and commerce and particularly international trade in goods and services of all kinds and to publish the results of such work together with recommendations and advice to make the same available to all persons, firms or companies whether or not members of the institute.*

*C) To advance public education as to commerce and industry and particularly the need for exports and the methods of realising the same and further to educate those who are or may become involved or interested in international trade in all aspects of the same.*

You have the right to object to us processing your data based on legitimate interest, see last section for full contact details.

## **Consent**

Through agreeing to this privacy notice you are consenting to the Chartered Institute processing your personal data for the purposes outlined. You can withdraw consent at any time by emailing or writing to us, see last section for full contact details.

## Disclosure

SYB Group Ltd may on occasions pass your Personal Information to third parties exclusively to process work on its behalf. The Institute requires these parties to agree to process this information based on our instructions and requirements consistent with this Privacy Notice and GDPR.

SYB Group Ltd do not broker or pass on information gained from your engagement with us without your consent. However, the company may disclose your Personal Information to meet legal obligations, regulations or valid governmental request. The company may also enforce its Terms and Conditions, including investigating potential violations of its Terms and Conditions to detect, prevent or mitigate fraud or security or technical issues; or to protect against imminent harm to the rights, property or safety of Chartered Institute, its clients and/or the wider community.

## Retention Policy

SYB Group Ltd will process personal data during the duration of any membership or contract and will continue to store only the personal data needed for six years after the contract has expired to meet any legal obligations. After six years any personal data not needed will be deleted.

## Data storage

Data is held in the different (multiple) servers. Where data is transferred to countries outside the EEA, we will ensure the appropriate safeguards are in place.

## Your rights as a data subject

At any point whilst the SYB Group Ltd is in possession of or processing your personal data, all data subjects have the following rights:

Right of access – you have the right to request a copy of the information that we hold about you.

**Right of rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete.

**Right to be forgotten** – in certain circumstances you can ask for the data we hold about you to be erased from our records.

**Right to restriction of processing** – where certain conditions apply you have a right to restrict the processing.

**Right of portability** – you have the right to have the data we hold about you transferred to another organisation.

**Right to object** – you have the right to object to certain types of processing such as direct marketing.

**Right to object to automated processing, including profiling** – you also have the right not to be subject to the legal effects of automated processing or profiling.

In the event that the company refuses your request under rights of access, we will provide you with a reason as to why, which you have the right to legally challenge.

The Chartered Institute at your request can confirm what information it holds about you and how it is processed

## **You can request the following information:**

- Identity and the contact details of the person or organisation (SYB Group Ltd) that has determined how and why to process your data.
- Contact details of the Director General where applicable
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of the company or a third party such as one of its clients, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority (Data Protection Regulator).
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

**To access what personal data is held, identification will be required**

SYB Group Ltd will accept the following forms of ID when information on your personal data is requested: a copy of your national ID card, driving license, passport, birth certificate and a utility bill not older than three months. A minimum of one piece of photographic ID listed above and a supporting document is required. If the company is dissatisfied with the quality, further information may be sought before personal data can be released.

All requests should be made by writing to us at the address further below.

**SYB GROUP Ltd**

67 Wingate Square,  
London, England, SW4 0A  
[ceo@syb.group](mailto:ceo@syb.group)

## Complaints

In the event that you wish to make a complaint about how your personal data is being processed by SYB Group Ltd or its partners, you have the right to complain to the company's Director General. If you do not get a response within 30 days you can complain to the Data Protection Regulator.

The details for each of these contacts are:

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London, England, SW4 0A  
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attention of the Director General