# THE INSTITUTE OF REVENUES, RATING & VALUATION

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# Institute of Revenues Rating and Valuation IRRV Privacy Notice 30/06/2022

#### **BACKGROUND:**

IRRV (Institute of Revenues Rating and Valuation) understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our members, customers and contacts, and will only collect and use personal data in ways described here, and in a way that is consistent with our obligations and your rights under the law.

A summary of the legal basis used by IRRV are:

- Contract: IRRV processes personal data that is necessary for the performance of a
  contract to which you may be a party to, or may want to enter. This includes, but not
  limited to, IRRV membership, examinations, courses/event associations and
  subscriptions.
- Legitimate interest: IRRV processes personal data in order to meet its legitimate
  interests as a professional association. This includes, but is not limited to
  responding to general enquiries, supporting our students, members and local
  authority associates, and improving our services relating to their Continued
  Professional Development, training and employment.
- Consent: IRRV processes personal data where you have provided your consent to do so.
- Public interest: IRRV as a professional body processes personal data to protect
  members of the public and in the public interest. This includes, but not limited to,
  the maintenance of the Members Directory, Professional Activities, and Member
  Investigations.
- Legal obligation: IRRV processes personal data that is necessary to comply with its legal obligations. This includes, but not limited to, providing personal information to local authorities, law enforcement agencies, and statutory bodies.



#### 1. Information About Us

IRRV (Institute of Revenues Rating and Valuation) a private company limited by guarantee without share capital, registered in England under company number 223447.

Registered address: 167-169, Great Portland Street

5th Floor, London

England. W1W 5PF

VAT number: 626 6045 44

Data Protection Officer: Shola Soyoye

#### 2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

#### 3. What Is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

# 4. Your Rights

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data.
  - This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or ask any questions using the details in Part 16.
- b) The right to access the personal data we hold about you. Part 14 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data. Part 9 will tell you how to do this.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please see Part 15 to find out more.

- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 16.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 16.

#### 5. What and How Personal Data is Collected

We collect some or all of the following that you provide to us. We do not collect any 'special category' or 'sensitive' personal data.

- 5.1 Personal Information you provide to us:
  - 5.1.1 Personal details title, name, address, gender, date of birth, personal email address, educational qualifications
  - 5.1.2 Employment details employers name, employers address, job title and business email address. For member applications, we may verify these details with your employment
  - 5.1.3 Company details company name, company address, contact details (name and email address) where the product or service will be used
  - 5.1.4 Financial details account and payment details.

We will only collect information that is relevant for the purpose collected.

# 5.2 Personal information you provide about third parties:

If you give us information about another person, you confirm that the other person has appointed you to act on their behalf and agreed that you:

- 5.2.1 shall consent on their behalf to the processing of their personal data;
- 5.2.2 shall consent on their behalf to the transfer of their personal data

- 5.3 Your information is collected from:
  - 5.3.1 any information entered on our website
  - 5.3.2 email, post, fax and mail correspondence with IRRV
  - 5.3.3 contact via phone
  - 5.3.4 social media channels
  - 5.3.5 application and request forms by post
  - 5.3.6 in-person contacts with IRRV employees, members, affiliates
  - 5.3.7 information we gathered via courses, professional meetings and events, and
  - 5.3.8 information we receive from external 3rd parties.

# 6. How Your Personal Data is Used

Under the Data Protection Legislation, we must always have a lawful basis for using personal data.

- 6.1 If you are an IRRV member, past member (including lapsed or resigned), we will use your information to:
  - 6.1.1 administer your membership or apprenticeship, including sending you subscription renewals and reminders;
  - 6.1.2 administer training, courses, examinations, professional meetings and IRRV events;
  - 6.1.3 maintain the accuracy of your information and communicate with you for any other reasons related to your membership;
  - 6.1.4 collaborate with member associations and local authorities as part of our partner relationship management activities;
  - 6.1.5 manage subscriptions to IRRV Publications and Forum services;
  - 6.1.6 administration of the Benevolent Fund;
  - 6.1.7 maintain relevant contact, including, but not limited to regular newsletters, rewards/benefits, updates on government legislation and updates on events, courses and conferences;
  - 6.1.8 With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email with information, news, and offers on our products and/or services
  - 6.1.9 maintain the member directory;
  - 6.1.10 investigate the issue/complainant against our staff and members
  - 6.1.11 share with any other party when sharing of information is required by law.

- 6.2 If you are not an IRRV member but work in fields related to Revenue, Rates or Valuation, we may use your information to:
  - 6.2.1 administer and develop our relationship with you, provide services and respond to your queries;
  - 6.2.2 administer professional meetings and IRRV events;
  - 6.2.3 collaborate with local authorities as part of our partner relationship management activities;
  - 6.2.4 manage subscriptions to IRRV Publications and Forum services:
  - 6.2.5 maintain relevant contact, including, but not limited to regular newsletters, updates on government legislation and updates on events, courses and conferences;
  - 6.2.6 With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email with information, news, and offers on our products and/or services
  - 6.2.7 investigate the issue/complainant against our staff and members
- 6.3 For all other non-members who have purchased or contacted IRRV regarding product or service We will use your information to:
  - 6.3.1 administer and develop our relationship with you, provide services and respond to your queries;
  - 6.3.2 maintain relevant contact, including, but not limited to regular newsletters, updates on government legislation and updates on events, courses and conferences
  - 6.3.3 With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email with information, news, and offers on our products and/or services.
- 6.4 You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to optout.
- 6.5 In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

# 7. Opting out of Direct Marketing

We will stop sending you promotional messages as soon as you have indicated your decision to not receive them.

If you no longer wish to receive promotional materials from IRRV, please respond to any of our emails and ask to be removed from our mailing list, email <a href="mailto:enquiries@irrv.org.uk">enquiries@irrv.org.uk</a> or write a letter to our Head Office.

# 8. Sharing of data

8.1 We sometimes need to share personal data with reputable third parties. We have data protection compliant agreements in place with all such service providers so they would only use your information according to our instructions.

These third parties have been informed NOT to use any personal information shared with them for marketing purposes. They include:

# 8.1.1 Service providers

IRRV uses a number of third-party service providers in order to carry out the activities described above, for example, to send you mailings or subscription renewal notices. We require such service providers to use your personal data only for the purpose of the relevant service.

# 8.1.2 Event sponsors

We may organise events, such as events and conferences which may be sponsored by other organisations, exhibitors or partners, and in order to administrate these events we may share your personal information with these sponsors.

# 8.1.3 Approved Employers

If your membership, study and examinations have been funded by your employer, we may liaise with them to provide relevant details, in order to validate your membership records or give you the opportunity to receive additional member benefits (e.g. training courses). Employers may be provided with your student results, where you have given your consent for us to do so

#### 8.1.4 General public

We publish our members' directory on the website, which is accessible by the public. Please contact membership@irrv.org.uk should you wish to opt out.

# 8.1.5 Verification of details and employment assistance

If you are a student, affiliate or a member (past or present), subject to obtaining your consent, we may provide relevant details to recruitment agencies, employers and educational or professional bodies for the purposes of assisting you to find appropriate employment. We will also provide information relating to verification of membership, training and qualification details.

8.2 With the exception of the above, we will not share any of your personal data with any further third parties for any purposes, without your permission, subject to the following exception.

- 8.2.1 Law enforcement agencies in connection with any investigation to help prevent unlawful activity
- 8.2.2 Associated bodies e.g. Membership Associations, IRRV Council (members and committees), assessment and training centres.
- 8.2.3 In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

# 9. Keeping Personal Information accurate and up to date

- 9.1 As an IRRV member, please note that it is your responsibility to inform us of any change to your contact details during your membership with IRRV. You can correct any mistakes in your information that we hold free of charge by:
  - 9.1.1 emailing membership@irrv.org.uk, calling or writing to us (using the contact details below in Part 16) and letting us know what information you would like corrected or;
  - 9.1.2 amending your details on the membership portal, by logging into your
- 9.2 For Non IRRV members, you can make a request to correct any mistakes in your information that we hold free of charge. If you would like to do this, please email (enquiries@irrv.org.uk), call or write to us (using the contact details below in Part 16) and let us know what information you would like corrected.

# 10. Data Retention

We will keep your information for a reasonable amount of time in order to perform the purposes listed above. We have a system of retention periods in place to ensure that your information is only stored whilst it is required for the relevant purposes or to meet legal requirements. Where your information is no longer required, we will ensure it is disposed of in a secure manner.

# 11. Data Storage or transfer of Personal Data

We will only store or transfer your personal data within the UK. This means that it will be fully protected under the Data Protection Legislation. For our overseas members we will transfer data outside of UK & EEA as part of our operations and service delivery.

# 12. Keeping your Personal Data secure

We will use technological and organisation measures to keep your information safe and secure.

Examples of these measures may include the following:

- user account access controlled by a unique username and password.
- all data is stored on secure servers
- payment details are encrypted using SSL

However, while we will use all reasonable efforts to secure your personal data, in using the site you acknowledge that the use of the Internet is not entirely secure and for this reason, we cannot guarantee the security or integrity of any personal data transferred from you or to you via the Internet. If you have any particular concerns about your information, please contact us using the details below in Part 16.

#### 13. Use of Cookies

We use cookies on our websites to manage the operation and performance of our sites.

Our website incorporates the use of cookies. Cookies are small data text files that are placed on your computer when you visit a website. Cookies help to make websites work efficiently and provide us with information about how our website is used.

When you the IRRV website linked to this Policy, we use cookies to enable us to collect standard internet log information and visit behavioural patterns. Cookies automatically identify your browser whenever you interact with our site. This helps us to make our site more responsive to your needs and to track and manage information relevant to your specific interests. In this way we can tailor our site to you, deliver a better and more personalised service and track the pages on our site that you are interested in.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how you can manage or delete them, visit www.allaboutcookies.org.

You can opt out of being tracked by Google Analytics across all websites by visiting https://tools.google.com/dlpage/gaoptout.

Our website uses the Google AdWords remarketing service to advertise on third party websites (including Google) to previous visitors to our site. It could mean that we advertise to previous visitors who haven't completed a task on our site, for example using the contact form to make an enquiry. This could be in the form of an advertisement on the Google search results page, or a site in the Google Display Network. Third-party vendors, including Google, use cookies to serve ads based on someone's past visits to the IRRV.org website. Of course, any data collected will be used in accordance with our own privacy policy and Google's privacy policy.

You can set preferences for how Google advertises to you using the Google Ad Preferences page, and if you want to you can opt out of interest-based advertising entirely by cookie settings or permanently using a browser plugin.

You should note that if you do not accept the cookies or subsequently choose to disable cookies, you may not be able to access all the services on our site. We also note that one of the cookies we use is essential for parts of the site to operate and has already been set.

We take reasonable organisational and technical measures to protect your information.

We take reasonable steps to protect your information against unauthorised access, modification or misuse. We use services provided reputable security providers and your information is accessed by our employees, agents and third-party partners on a needs-only basis.

# 14. Access to Personal Data

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 16.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

The following information will be required:

- IRRV member your membership number;
- Non-IRRV member a copy of your photo id;
- The department you were in contact with where you would like to obtain your information from;
- Description of the information you are planning to access (e.g. information concerning the complaint you made; correspondence between a period of time)

We may contact you using any contact details you have provided to obtain more information and assure your identity if needed in order to process your request.

If you are not located in the UK, your right of access to your information will be assessed and administered according to local legislation.

We will respond to your subject access request within 21 days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

#### 15. The Right to be Forgotten

- Data subjects have the right to request that the Institute erases the personal data it holds about them in the following circumstances:
  - a) it is no longer necessary for the Institute to hold that personal data with respect to the purpose(s) for which it was originally collected or processed:
  - b) the data subject wishes to withdraw their consent to the Institute holding and processing their personal data;

- c) the data subject objects to the Institute holding and processing their personal data (and there is no overriding legitimate interest to allow the Institute to continue doing so;
- d) the personal data has been processed unlawfully;
- e) the personal data needs to be erased in order for the Institute to comply with a particular legal obligation.
- 15.2 Unless the Institute has reasonable grounds to refuse to erase personal data, all requests for erasure shall be complied with, and the data subject informed of the erasure, within one month of receipt of the data subject's request. The period can be extended by up to two months in the case of complex requests. If such additional time is required, the data subject shall be informed.
- 15.3 In the event that any personal data that is to be erased in response to a data subject's request has been disclosed to third parties, those parties shall be informed of the erasure (unless it is impossible or would require disproportionate effort to do so).

#### 16. Contact Details

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Shola Soyoye
Data Protection Manager
IRRV
shola.soyoye@irrv.org.uk
167-169, Great Portland Street
5th Floor, London
England.
W1W 5PF

# 17. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection. Any changes will be made available on our website

This Policy was last reviewed in June 2022.

Please write to the Data Protection Officer if you:

- a) have any questions about how IRRV collects and uses your information;
- b) want to access the information IRRV hold about you;
- c) address any concerns about the information you have provided IRRV; or
- d) have any complaints about how IRRV uses your information.