

To whom it may concern

29 May 2018

Dear Sirs

East Midlands Chamber (Derbyshire, Nottinghamshire, Leicestershire) and GDPR

You will no doubt be aware that the General Data Protection Regulation (GDPR) came into force in the UK on 25 May 2018. GDPR is a set of Regulations which have been adopted by all countries in the European Union and it applies to all organisations that collect and process the personal data of EU citizens.

East Midlands Chamber (Derbyshire, Nottinghamshire, Leicestershire) [the Chamber] recognises the need to comply with GDPR and ensure that effective measures are in place to protect the personal data of our members, customers, employees and other stakeholders, and to ensure that it is processed lawfully, fairly and transparently.

Commitment to the security of personal data extends throughout the organisation and is demonstrated through the relevant policies and the provision of appropriate resources to establish and develop effective data protection and information security controls.

The Chamber has introduced a comprehensive programme to understand and validate our use of personal data and to confirm the lawful basis of our processing.

Specifically, we can confirm that:

- A policy is in place for the protection of personal data within the Chamber. This policy has been developed by senior management and communicated to all employees through a comprehensive awareness training programme
- We believe that all staff understand their roles in the processing and protection of personal data, including confidentiality requirements

East Midlands Chamber (Derbyshire, Nottinghamshire, Leicestershire)
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- We have identified the personal data we process, including where special categories are involved
- We have established the lawful basis under the GDPR for any data which is processed
- Where we have used legitimate interests as the lawful basis for processing data, we have conducted a documented three part test to assess the benefits versus the impact on the data subject of the processing
- In those cases where our processing is based on consent, we have taken steps to ensure clear, free consent has been given and is recorded
- We have ensured that the required privacy information is provided in clear language whenever we collect personal data
- Procedures and facilities are in place to promptly process and fulfil data subject requests, such as consent withdrawal, access and rectification
- The length of time we keep personal data for has been minimised, and is defined individually for each area of processing
- Records of our GDPR decisions are maintained in a central log
- Where we are a controller, all of our processors have been contacted to ensure that those processors are able to comply with the requirements of the GDPR
- As a matter of course, we do not transfer personal data internationally, but we are aware that should we do so that then the transfer need to be legal under GDPR
- We plan for data protection in new or changed services and systems, including minimising our use of personal data and protecting it
- Should a data breach be identified, no matter how small, we have procedures in place to assess the severity of the breach and the actions to be taken regarding reporting the breach and taking rectification actions
- We have appointed a Data Quality Manager who can be contacted by mail at Commerce House, Millennium Way, Dunston Road, Chesterfield, Derbyshire S41 8ND or by telephone on 0333 320 0333 or 01246 207 207

We will continue to develop and improve our data protection policies and controls over time, guided by legal requirements and the needs and preferences of our members, customers and partners.

Yours sincerely



David C Pearson
DIRECTOR OF PARTNERSHIPS AND MEMBERSHIP SERVICES