



## Fund Boards Council Privacy Statement

**Owner:** UKFB & Co Ltd, a registered company in England and Wales under company number 11629067 ("UK Fund Boards", "we" or "us"), trading as "Fund Boards Council" ("FBC") with registered address: 22 Wenlock Road, London, N1 7GU, and customer services at [contact@fundboards.org](mailto:contact@fundboards.org)

**Terms:** "Site" refers to <https://www.fundboards.org/> or <https://fbcevents.live/> or subdomains of these sites. For the avoidance of doubt and unless otherwise specified, "Corporate Member" refers to the asset management firm and "individuals" refers to individual members who joined FBC because their firm is a "Corporate Member", or who are provided with membership at FBC's discretion. "Member" shall refer to both Corporate Member and individuals.

### 1. General

FBC is committed to protecting and respecting your privacy. For the purposes of the General Data Protection Regulations (GDPR) and the Data Protection Act (2018), the Data Controller is UKFB & Co Ltd.

This Statement sets out why we collect personal information about individuals and how we use that information. It explains the legal basis for this and the rights you have over the way your information is used.

Data Protection Legislation means all laws and regulations relating to the Processing of Personal Data and privacy of individuals in the relevant jurisdiction, including, without limitation, (i) the UK Data Protection Act 2018 or any successor legislation, and (ii) the General Data Protection Regulation. **"Data Subject", "Personal Data", "Personal Data Breach", "Process"/"Processing" and "Supervisory Authority"** shall have the meanings ascribed to them in the Data Protection Legislation.

It is understood that both the Corporate Member and FBC are separate independent data controllers.

FBC shall at all times comply with Data Protection Legislation applicable to it.

FBC shall only Process Personal Data for the purposes of providing the services under this privacy policy, FBC's Membership Terms and Conditions and Website Terms and Conditions.

FBC shall implement appropriate technical and organisational measures to ensure a level of security reasonably appropriate to the risk of the Processing of Personal Data under this agreement, including to protect the Personal Data against a Personal Data Breach.

FBC shall notify any Member, without undue delay, with all relevant details reasonably available of any Personal Data Breach and, on request, provide that Member with cooperation and information in relation to the Personal Data Breach.

If FBC receives any complaint, notice or communication from a Data Subject, a Supervisory Authority or any other third party which relates to its or a Corporate Member's Processing of Personal Data, FBC will promptly forward such complaint, notice or communication to the Corporate Member, and provide reasonable cooperation and assistance to the Corporate Member in relation to the same. FBC shall deal promptly and in good faith with all reasonable and relevant enquiries from the Corporate Member relating to its Processing of Personal Data.

This Statement covers us in relation to the collection and use of the information you give us, that identifies, or could reasonably be used to identify you as an individual.

If you have any questions about this Statement or concerning your personal information, please contact FBC's Head of Operations at [fevans@fundboards.org](mailto:fevans@fundboards.org)

## **2. The type of personal information we collect**

Unless otherwise specified, the type and amount of personal information we collect depends on why you are providing it.

The personal information we collect when you register to become a member of Fund Boards Council may include some or all of the following:

- First name
- Last name
- Profession
- Company name
- Job title
- Job role(s)
- Jurisdiction
- Whether you are an independent director or not
- Telephone number(s)
- Email address(es)
- Areas of professional expertise and interest

Any additional financial and transaction personal information, such as credit or debit card number, bank account information, and billing address information required in order to process any payment will be processed securely and externally by our payment service provider, Stripe.

All personal data you supply to Stripe shall be governed by Stripe's data protection and privacy policy. We will share information with Stripe only to the extent necessary for the purposes of processing payments you make via our website.

Details of Stripe's data processing can be found <https://stripe.com/gb/legal/privacy-center>

### **3. How we collect information**

We may collect information from you whenever you contact us or have any involvement with us for example when you:

- create or update a membership profile for FBC
- post content onto our website/forums
- visit our website
- enquire about our activities or services
- sign up to receive news about our activities or sign up to our email subscription services via Wild Apricot (see here for more information: <https://www.wildapricot.com/>)
- register for or attend/take part in our in-person or digital events
- contact us in any way including online, email, phone, SMS, social media or post

In the event that FBC is sold, these terms remain in place for those members transferring to the successor business until such time as they are updated by the successor business and members are notified accordingly.

### **4. Surveys, Questionnaires and Polls**

From time to time we may contact you to participate in an FBC survey, questionnaire or poll. Any data you provide may be aggregated and used in the preparation of an anonymised report. Participation is entirely voluntary and prior to involvement, you will be informed about:

- The type of information that we plan to collect
- How we intend to collect it (e.g. via an online secure portal, using polling or survey software, by an interview process, etc.)
- What we will do with the information and how it will be shared (e.g. via an anonymised benchmarked report)
- How the information will be securely stored

At all times, FBC will adhere to appropriate data privacy requirements under GDPR and unless you are informed otherwise, this data privacy policy will apply in all cases. See also section 13 – How long we keep your information for.

### **5. Where we collect information from**

We collect information when:

- 1) you give it to us directly, eg in the scenarios outlined above or contact us for any other reason. Your information may be collected by an organisation we are working with, but we are still responsible for your information.
- 2) you use our website: information about you is recorded and stored. See the information about the use of cookies under that heading below.
- 3) it is available on social media: depending on your settings or the privacy policies applying for social media and messaging services you use, like LinkedIn, Facebook, Instagram or Twitter, you might give us permission to access information from those accounts or services.
- 4) It is available on other public sites: such as your company website, Companies House or the FCA directory where information is publicly available.

## **6. How we use your information**

We will use your personal information in a number of ways which reflect the legal basis applying to processing of your data. These may include:

- providing you with the information or services you have asked for
- sending you communications with your consent that may be of interest, including marketing information about our services and activities
- when necessary, for carrying out your obligations under any contract between us
- seeking your views on the services or activities we carry on so that we can make improvements
- maintaining our organisational records and ensuring we know how you prefer to be contacted
- analysing the operation of our website and analysing your website behaviour to improve the website and its usefulness
- Anonymising and aggregating the information provided in order to analysis and research board activities and meeting preparation including to produce research reports, including statistics, that will provide insight into different aspects of board operations.

## **7. Use of Aggregated Data**

Where Data can be aggregated (and anonymised), we may use this without restriction for research purposes.

For example, we may monitor customer traffic patterns, Site and services usage and related information in order to optimise users' usage of the Site and services and we may give aggregated statistics to a reputable third-party.

We are entitled to do this because the resulting data will not personally identify you and will therefore no longer constitute personal data for the purposes of data protection laws.

## **8. Our legal basis for processing your information**

The use of your information for the purposes set out above is lawful because one or more of the following applies:

- where you have provided information to us for the purposes of requesting information or requesting that we carry out a service for you, we will proceed on the basis that you have given consent to us using the information for that purpose, based on the way that you provided the information to us. You may withdraw consent at any time by emailing us at [contact@fundboards.org](mailto:contact@fundboards.org). This will not affect the lawfulness of processing of your information prior to your withdrawal of consent being received and actioned;
- it is necessary for us to hold and use your information so that we can carry out our obligations under a contract entered into with you or to take steps you ask us to prior to entering into a contract;
- it is necessary to comply with our legal obligations;
- where the purpose of our processing is the provision of information or services to you, we may also rely on the fact that it is necessary for our legitimate interests, or the legitimate interests of a relevant third party, in relation to providing the information or service requested, and given that you have made the request, would presume that there is no prejudice to you in our fulfilling your request.

If you want to contact us about your marketing preferences, please contact [contact@fundboards.org](mailto:contact@fundboards.org)

## 9. How we keep your information safe

We understand the importance of keeping your personal information secure and take appropriate steps to safeguard it. We strive to protect your information and our Services from unauthorised access to or alteration of your information. This includes the use of various security measures to protect your information held by or on behalf of us and ongoing review of our information collection, storage and processing practices.

Our online services are administered by Cloudways (<https://www.cloudways.com/en/>) and their servers which host your information are looked after with corporate-standard reliability assured through regular maintenance, software upgrades, bug fixes, virus protection, patches and backups carried out on your behalf.

Cloudways' server security includes:

- **Dedicated Firewalls:** All hosted servers are protected by OS-level firewalls that filter out malicious traffic and keep out the intruders.
- **1-Click Free SSL Installation:** Built-in Let's Encrypt SSL improves website security with a trusted certificate that fulfils all HTTPS requirements.
- **IP Whitelisting:** Enables creation of a whitelist of IPs, making it easy to collaborate with networks or regions with unrestricted access to SSH and SFTP.
- **Regular Security Patching:** Regular OS patches on servers to ensure a secure managed cloud server and avoid vulnerabilities.
- **Two-Factor Authentication:** An easy and effective extra layer of safety for accounts, keeping servers safe from any intruder.
- **Bot Protection:** Protects WordPress websites from traffic congestion caused by malicious bots, brute force login attacks and Denial-of-Service (DoS) attacks with the help of Cloudways' technology partner, Malcare.

We do not store card details at any time on the website database. As documented above, financial and transaction personal information, such as credit or debit card number, bank account information, and billing address information required in order to process any payment will be processed securely and externally by our payment service provider, Stripe. All personal data you supply to Stripe shall be governed by Stripe's data protection and privacy policy. We will share information with Stripe only to the extent necessary for the purposes of processing payments you make via our website. All stripe payments are made on our subdomain: <https://secure.fundboards.org>

Passwords are stored encrypted so in the event of a data breach, passwords are not revealed. FBC website administrators do not have access to member account passwords. In the event of lost or forgotten passwords, new passwords can be created by the FBC member themselves.

We always ensure only authorised persons have access to your information, which means only our employees and contractors, and that everyone who has access is appropriately trained to manage your information. All Contractors and Consultants that have administrator access to the FBC website have signed a non-disclosure agreement.

No data transmission over the internet can be guaranteed to be completely secure. Because of this, whilst we strive to safeguard your information, we cannot guarantee the security of any information you provide online, and you do this at your own risk.

## **10. Who has access to your information?**

Third parties who provide services for us which includes:

- 1) Wild Apricot, which administers our mailing lists and operates as our CRM database (Wild Apricot's Privacy Policy and other terms can be found here: <https://www.wildapricot.com/privacypolicy>)
- 2) Cloudways which hosts our website and analyses website traffic (Cloudways' Privacy Policy and other terms can be found here: <https://www.cloudways.com/en/terms.php#privacy>)
- 3) Microsoft Teams through which the FBC team manages its workflow (Microsoft's Privacy Policy can be found here: <https://privacy.microsoft.com/en-gb/privacystatement>)

Occasionally, we will also share information with:

- 1) Selected third parties if we run an event in conjunction with them (this will not include personal data such as email addresses)-
- 2) Third parties in connection with restructuring or reorganisation of our operations, for example if we merge with another business. In such event, we will take steps to ensure you are informed of which third parties your data will be transferred to and that your privacy rights will be protected by the third party.

We select our third-party service providers with care. We provide these third parties with the information that is necessary to provide the service and more information about their data and privacy policies can be found on their websites, as noted above.

Owing to matters such as financial or technical considerations, the information you provide to us may be transferred to countries outside the European Economic Area (EEA), which are not subject to the same data protection regulations as apply in the UK. This may be because third parties that we share data with store this information on servers outside the EEA, or because we use a supplier based outside the EEA. We meet our obligations under GDPR by ensuring that the information has equivalent protection as if it were being held within the EEA. We do this by ensuring that any third parties processing your data outside the EEA either benefits from an adequacy determination under article 45 of the GDPR and/or, where appropriate, we have entered into a data processing agreement which contains model EU clauses.

We may also disclose your personal information if we are required to do so under any legal obligation and may use credit reference agencies for the purposes of fraud prevention and credit risk reduction, or where doing so would not infringe your rights, but is necessary and in the public interest.

Other than for these reasons, we will not share your information with other organisations without your consent.

## 11. Keeping your information up to date

If any of the personal information you have provided to us changes, please update your profile by logging in and accessing your “Account” section of the website at [www.fundboards.org](http://www.fundboards.org) or, alternatively, please contact us at [contact@fundboards.org](mailto:contact@fundboards.org)

## 12. Cookies

In addition to the information which you supply to us, information and data may be automatically collected through the use of cookies. Information about FBC use Cookies can be found in the FBC Cookies Policy.

## 13. How long we keep your information for

We will hold your personal information for as long as it is necessary for the relevant activity.

DATA	KEPT FOR:
Records obtained for purposes of facilitating membership services, log-in details.*	7 days after lapse of membership IF individual has opted out of FBC subscription
Contact details and marketing preferences of members who have consented to receive marketing	Two years from last consent obtained
Survey, questionnaire and poll responses in unaggregated/anonymised format	Two years from data collection
Records of any communications members have entered into with us	Three years
Records of any communications prospective corporate members have entered into with us	Three years

\*At the end of an individual's membership, they will automatically be moved to 'subscriber status' and will continue to receive emails and newsletters from FBC. Individuals can opt out at any time. If you ask us to stop contacting you with marketing materials, we will keep a record of your contact details and limited information needed to ensure we comply with your request.

## 14. Your rights

You have the right to request details of the processing activities that we carry out with your personal information through making a subject access request. No charge may be made under applicable law except in very limited circumstances (which will be explained to you upon request). To make a request, please contact us at [contact@fundboards.org](mailto:contact@fundboards.org)

## 15. You also have the following rights:

- the right to request rectification of information that is inaccurate or out of date;
- the right to erasure of your information (known as the “right to be forgotten”);
- the right to restrict the way in which we are dealing with and using your information;

- the right to request that your information be provided to you in a format that is secure and suitable for re-use (known as the “right to portability”); and
- rights in relation to automated decision making and profiling including profiling for marketing purposes.

To exercise any of these rights, you should contact Head of Operations, Fund Boards Council at [fevans@fundboards.org](mailto:fevans@fundboards.org).

If you are not happy with the way in which we have processed or dealt with your information, you can complain to the Information Commissioner's Office. Further details about how to complain can be found <https://ico.org.uk/>.

## **16. Surveys and user groups**

We always aim to improve the services we offer. As a result, we occasionally canvass our members using surveys (where the member has opted in for this). Participation in surveys is voluntary, and you are under no obligation to reply to any survey you might receive from us. Should you choose to do so, we will treat the information you provide with the same high standard of care as all other customer information.

## **17. Changes to this Privacy Policy**

This Policy may be changed from time to time. If we make any significant changes, we will advertise this on our website or contact you directly with the information. We recommend that you read this Privacy Policy each time you consider giving your personal information to us.