

## British Chamber of Commerce Myanmar

### Member Data Protection & Privacy Policy.

---

June 2023

Version 1

Author:

**Peter Crowhurst**

**Chief Executive Officer**

---

## Introduction

The British Chamber of Commerce Myanmar (the Chamber) manages a considerable amount of personal data with its daily activity. This includes a database of more than 6,000 contacts and a membership database of approximately 1,000 persons. Additionally, the Chamber has approximately 40,000 followers on various social media outlets.

In straightforward terms the Chamber, which includes its board of directors, management team and working group Chairs, has a responsibility to ensure that members and contact data is preserved and not passed to third parties without the consent of Chamber Management or without the consent of the contact owner.

### 1. About this Policy

- a. This policy explains when and why the Chamber collects personal information about its members, how the Chamber uses it, how the Chamber keep it secure and the data owners' rights in relation to the personal information.
- b. The Chamber may collect, use and store your personal data, as described in this Policy and as described when the Chamber collects data from you.
- c. The Chamber reserves the right to amend this Personal Data Protection Policy from time-to-time without prior notice. You are advised to check our website [www.britishchambermyanmar.com](http://www.britishchambermyanmar.com) regularly for any amendments (but amendments will not be made retrospectively).
- d. The Chamber will always comply with the applicable national data protection laws, including but not limited to, the EU General Data Protection Regulation

| Private & Confidential, Propriety & Privileged |

This and future amendments of this document is not for circulation or use by any member or non-member © without written approval from BCCM Management

(**GDPR**) 2016/269 when dealing with your personal data. For the purposes of the GDPR the Chamber will be the “controller” of all personal data the Chamber holds about you.

## 2. Who is The Chamber?

- a. The Chamber is the British Chamber of Commerce Myanmar (the Chamber). The Chamber can be contacted at, **E-mail:** [info@britishchambermyanmar.com](mailto:info@britishchambermyanmar.com)
- b. The Chamber is a Myanmar registered, incorporated not-for-profit business.

## 3. What information does The Chamber collect & store and why?

Type of information	Purposes	Legal basis of processing
Name, address(es), telephone numbers, e-mail address(es) of Members.	Managing the Member's Membership of the Chamber	Performing the Chamber's contract with the Member and for the purposes of our legitimate interests in operating the Chamber
Name, address(es), telephone numbers, e-mail address(es) of Event Attendees.	<p>Managing an event booking.</p> <p>Contacting the Event Attendee regarding future occurrences of the same event or similar events of legitimate interest run by the Chamber.</p>	<p>Performing the Chamber's contract with the Event Attendee.</p> <p>For the purposes of our legitimate interests in operating the Chamber.</p> <p>For the purposes of our legitimate interests in promoting the Chamber.</p> <p>Consent. The Chamber will seek the Event Attendee's consent to contact them regarding future events with each event entry, and the Event Attendee may withdraw their consent at any time by contacting us by telephone, e-mail or letter.</p>

		<p>The Chamber provides an opportunity for a member or non-member participating in any event with the choice to be contacted or not by any event organiser.</p>
<p>Member's profession, title, business sector.</p>	<p>Facilitates relations between the Chamber and Members</p>	<p>For the purposes of our legitimate interests in operating the Chamber.</p> <p>This is useful for when seeking expertise to link members to members.</p> <p>The Chamber would always seek the permission of the named person to share information to third parties.</p>
<p>Photos and videos of Members</p> <p>Photos and videos of Event Attendees .</p>	<p>Publishing on the Chamber's website and social media pages and using in press releases.</p>	<p>For the purposes of our legitimate interests in promoting the Chamber.</p> <p>Consent. The Chamber will seek the Member's consent with each Membership application and the Member may withdraw their consent at any time by contacting the Chamber by telephone, e-mail or letter.</p> <p>Consent. The Chamber will seek the Event Attendee's consent with each event entry and the Event Attendee may withdraw their consent at any time by contacting us by telephone, e-mail or letter.</p>
<p>Member's name and e-mail address</p>	<p>Creating and managing the Chamber's printed and online Membership Directory.</p>	<p>The Chamber will seek the Member's consent with each Membership application and</p>

| Private & Confidential, Propriety & Privileged |

This and future amendments of this document is not for circulation or use by any member or non-member © without written approval from BCCM Management

		the Member may withdraw their consent at any time by contacting us by telephone, e-mail or letter to request the Chamber to remove details from the Membership Directory.
Bank account details of the Member or other person making payment to the Chamber and transaction records.	Managing the Member's Membership of the Chamber and the provision of services and events.	Performing the Chamber's contract with the Member.
Instructor's name, address, email addresses, phone numbers and relevant qualifications and/or experience.	Managing instruction/courses and other webinars at the Chamber.	For the purposes of our legitimate interests in ensuring that the Chamber can contact those offering instruction and provide details of instructors to Members.
Record of visitors and Members' guests in the Guest Book (online or physical) <b>(Name, Chamber name).</b>	Managing non-Member access to the Chamber.	For the purposes of our legitimate interests in operating the Chamber and compliance with the Chamber's Rules and Byelaws.
Special Dietary Requirements.	To ensure the food provided by the Chamber meets an individual's special dietary needs.	To enable the Chamber to safeguard the health and safety of Members and event attendees.  This information is destroyed when the event is over.
Passport Information	The Chamber may provide members and participants of any trade mission invitation letters. To receive visa invitation letters from the Chamber	To develop trade opportunities. From time to time, this may include market visits.

| Private & Confidential, Propriety & Privileged |

This and future amendments of this document is not for circulation or use by any member or non-member © without written approval from BCCM Management

		All passport details will be deleted at the end of any trade mission or visit.
--	--	--

#### 4. How The Chamber protects your personal data

- a. The Chamber has implemented generally accepted standards of technology and operational security to protect personal data from loss, misuse, or unauthorised alteration or destruction. Please note, however, that information to us over the internet can never be guaranteed to be 100% secure.
- b. For any payments which The Chamber takes from you online, the Chamber will use a recognised online secure payment system.
- c. The Chamber will notify you promptly in the event of any breach of your personal data which might expose you to any serious risk.

#### 5. Who else has access to the information you provide us?

- a. The Chamber will never sell your personal data. The Chamber will not share your personal data with any third parties without your prior consent (which you are free to withhold), except where the Chamber is required to do so by law or as set out in the table above, or as set out in paragraph 5b below.
- b. The Chamber may pass your personal data to third parties who are service providers, agents and subcontractors to the Chamber for the purposes of completing tasks and providing services to you on our behalf, e.g. to print newsletters and to send you mailings. However, the Chamber will disclose only the personal data that is necessary for the third party to deliver the service, and only if the Chamber has a contract in place that requires the third party to keep your information secure and not to use it for their own purposes.

#### 6. How long does The Chamber keep your information?

- a. The Chamber will hold your personal data on our CRM system (currently known as Glue Up) for as long as you are a Member of the Chamber, and for as long afterwards as is necessary to comply with our legal obligations.

| Private & Confidential, Propriety & Privileged |

This and future amendments of this document is not for circulation or use by any member or non-member © without written approval from BCCM Management

- b. The Chamber will review data every year to establish whether it is still entitled to process it. If the Chamber decides that it is no longer entitled to do so, the Chamber will stop processing your personal data except where required to retain your personal data in an archived form in order to comply with legal obligations.
- c. The Chamber will ensure that, from time to time, it:
  - i. reviews the length of time for which personal data is retained;
  - ii. considers the purpose(s) for which the personal data is held, deciding whether and for how long to retain it;
  - iii. securely deletes personal data that is no longer needed for the purpose(s), subject to compliance with applicable legal requirements and internal record-keeping policy; and
  - iv. updates, archives or securely deletes information if it goes out of date.
- d. The appropriate retention period is likely to depend on the following:
  - i. what the personal data is used for;
  - ii. the surrounding circumstances;
  - iii. any legal / regulatory requirements; and
  - iv. the Chamber policy and/or best practice.
- e. The Chamber will securely delete your personal data once the Chamber has used it and no longer needs it. Where the Chamber cannot delete personal data for legal, regulatory or technical reasons the Chamber will ensure the security and confidentiality of the data is protected, and only use it for the specified purpose for which it is kept.

## 7. Data Breach & Incident Management

- a. A personal data breach is defined as the unauthorised or accidental disclosure of, access to, loss, theft or alteration, destruction or damage of personal data. Examples of personal data security breaches may include but is not limited to, the following:
  - i. loss or theft of hard copy personal data;
  - ii. disclosing personal data (via letter, fax, email, text message, etc.) to the wrong recipient; or
  - iii. unsecure disposal of hard copy records containing personal data in non-confidential waste bins, resulting in loss or theft of that data.
- b. A personal data breach also includes circumstances where personal data appears to have been lost, stolen or otherwise potentially exposed, even if it is later determined that personal data was not actually exposed.

| Private & Confidential, Proprietary & Privileged |

- c. All Chamber staff must immediately report all personal data breaches of which they become aware to the Chamber's nominated Data Protection Officer irrespective of the perceived severity of the breach.

## 8. Member rights

- a. You have rights under the GDPR:
  - i. to access your personal data held by the Chamber;
  - ii. to be provided with information about how your personal data is processed;
  - iii. to have your personal data corrected; the Chamber may provide links for members to correct or update themselves;
  - iv. to have your personal data erased in certain circumstances;
  - v. to object to or restrict how your personal data is processed;
  - vi. to have your personal data transferred to yourself or to another business in certain circumstances.

For more details, please address any questions, comments and requests regarding the Chamber's data processing practices to our Data Protection Officer: [info@Britishchambermyanmar.com](mailto:info@Britishchambermyanmar.com)