

Membership - Privacy Notice

1. Introduction

Central England Co-operative Limited (CEC) is committed to ensuring the privacy of colleagues is protected. Should we ask you to provide personal data, then it will only be used in accordance with this Privacy Notice. CEC collects and processes personal data relating to you to manage our employment relationship. We are committed to being transparent about how we collect and use that personal data and to meet our data protection obligations.

2. Who we are

Central England Co-operative Limited (CEC)

ICO registration: Z616328X

Queen Street
Lichfield
Staffordshire
WS13 6QD

We have appointed a Data Protection Officer (DPO), who can be contacted via the following email address should you have any questions about the way your personal data is handled.

Email: enquiries@centralcoop.co.uk

Personal data we collect about you

We collect and process a range of personal information about you, to allow us to manage our relationship with you. This includes:

Category of personal information	Description
Identity details	First name, last name, title, date of birth, image, membership number, membership application
Contact details	Telephone number(s), email address(es), postal address(es), work address(es), delivery address(es).
Communication details	Feedback, marketing preferences, questions, notes, any data that is contained within a message body or a subject from an individual.
Bank details	Sort code, card number, expiry date, account number, account name, bank branch, transaction date.

Transaction data	Items purchased, spending details, purchase history.
Membership Data	Voting history, shares, dividends, meeting minutes, meeting attendance, personal vouchers.

3. How we collect your personal data

We will collect your personal data in the following ways:

- When you provide your membership card when making a purchase;
- When you sign up for to become a member;
- When you attend membership meetings;
- When you sign up to the CEC membership app;
- When you are captured on our CCTV systems;
- When you enter any competitions or prize draws with us;
- When you consent to receive marketing from us; and
- When you correspond with us via email, text, telephone or post.

4. Why do we process your personal data?

We are only allowed to process your personal data if we have a lawful basis to do so and are required to inform you of what that lawful basis is. We have set out in the table below: the purposes for processing your data, the categories of personal data affected, and the lawful basis on which we rely on when we process your personal data.

In some circumstances we can use your personal data if it is in our legitimate interest to do so, provided that we have told you what that legitimate interest is. A legitimate interest is when we have a business or commercial reason to use your information which, when balanced against your rights, is justifiable. If we are relying on legitimate interests, we have set that out in the table below.

Purposes for processing	Categories of personal data	Lawful basis for processing	Legitimate Interests (if applicable)
To process card payments that you make with us.	• Identity • Bank details	• Performance of a contract • Legal Obligation	N/A
For the administration and delivery of your membership card.	• Identity • Contact • Bank • Membership	• Performance of a contract	N/A
To facilitate and manage our member app.	• Identity • Contact • Membership • Technical •	• Performance of a contract	N/A

To invite you to member meetings and engage with member voting.	• Identity • Contact • Membership	• Performance of a contract	N/A
To pay you shares and dividends	• Identity • Contact • Membership	• Performance of a contract	
To send you offers, vouchers and information about products and services.	• Identity • Contact	• Consent	N/A
To administer any prize draws or competitions that you have entered.	• Identity • Contact	• Consent	N/A
To communicate with you regarding your membership with us.	• Identity • Contact • Communication	• Legitimate Interests	To keep you updated with information relating to your membership with us.
To cleanse our membership database.	• Identity • Contact • Membership	• Legitimate Interests	To ensure our membership database is maintained and remove data that does not need to be retained.
To communicate with your enquires, complaints and compliments.	• Identity • Contact • Communication	• Legitimate Interests	To manage your relationship with us and further improve our services.
To record health and safety incidents that in our stores.	• Identity • Contact • Health	• Legal Obligation	N/A
When we capture your image on our CCTV systems including body worn cameras.	• Identity	• Legitimate Interests	For your safety and for the prevention and detection of crime.
To analyse purchase data and history.	• Identity • Membership	• Legitimate Interests • Consent	To continually improve and provide a more bespoke service to our members.

5. Who we share your data with?

In order to administer our services and meet our legal obligations, we only share your personal data with third parties in the following circumstances:

- To administer card payments made in store or online;
- For the administration and creation of your membership card;
- Our mail service provider to send you offers and vouchers;
- To conduct membership database cleansing;
- To manage and store your personal data; and
- To meet legal obligations, for example, for the purposes of national security, auditors, taxation and criminal investigations.

If requested, we will share your personal data with authorities such as:

- The Police;
- The Health and Safety Executive;
- Local Authorities;
- Her Majesty's Revenue and Customs (HMRC);
- The Courts; and
- Central or Local Government Bodies.

Before we share your personal data with a third party, we will ensure that there is an appropriate Data Processing or Data Sharing Agreement in place to protect the sharing of data.

6. Transferring personal data outside of the EEA

The EEA is the European Economic Area, which consists of the EU Members States, Iceland, Liechtenstein and Norway. If we transfer your personal data outside of the EEA, we must tell you and we must rely on one of the following:

- **Adequacy Decision:** The country we send your personal data to provides an adequate level of protection which has been approved by the European Commission.
- **Standard Contractual Clauses (with the IDTA Addendum):** The recipient of your personal data has provided us with signed Standard Contractual Clauses with the IDTA Addendum include. This holds the recipient accountable to safeguard the personal data.
- **International Data Transfer Agreement (IDTA):** The recipient of your personal data has provided us with a signed IDTA which has been approved by the Information Commissioners Office (ICO). This holds the recipient accountable to safeguard the personal data.

Currently there are no circumstances where your personal data may be transferred outside of the EEA.

7. How do we protect your personal data?

We take the security of your personal data seriously. We have internal policies and controls in place to ensure that we have implemented measures to ensure that your data

is not lost, accidentally destroyed, misused, or disclosed without our authority, and is not accessed except by our colleagues only in the performance of their professional duties.

Where we engage third parties to process personal data on our behalf, they do so on the basis of written instructions, are operating under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

8. Retention of your personal data?

We will only retain your personal data for as long as necessary to fulfil the purposes of our processing. This includes satisfying any legal, accounting, or reporting requirements.

When we assess the retention of your personal data, we will take the following into consideration:

- Nature of the information;
- Sensitivity of the information;
- Potential risks if the information was breached;
- The purpose(s) for which we initially processed the information;
- Whether we can achieve the purpose(s) through less invasive means; and
- Any applicable legal requirements.

9. Your Rights

All individuals who engage with us have data subject rights relating to the processing of their personal data. These are the rights that apply to your personal data held within CEC:

- **The right to be informed** – you have the right to know what information we hold and process about you which is why we have provided this Privacy Notice.
- **The right of access** – you have the right to ask for a copy of the information we hold regarding yourself.
- **The right to rectification** – you have the right to ask for us to correct any information we hold which may be inaccurate or incorrect.
- **The right of erasure** – you have the right to have your personal data ‘erased’ in the following situations:
 - Where the personal data is no longer required for the purpose(s) for which it was originally collected or processed;
 - Where the processing was based on consent and you have withdrawn your consent;
 - When the personal data was unlawfully processed; and
 - When the personal data has to be erased in order to comply with a legal obligation.

We will erase your records when one of the above situations apply.

- **The right to object** – you have the right to object to the processing of your personal data in the following circumstances:

- The purpose of the processing activity is direct marketing;
 - Where the processing is based on legitimate interests; and
 - Processing for the purposes of scientific/historical research and statistics.
- **The right to restriction of processing** – you have the right to ask us to restrict the processing of your personal data in certain situations such as:
 - Where you contest the accuracy of your personal data, we will restrict the processing until you have verified the accuracy of your personal data;
 - When processing is unlawful, and you oppose erasure and request restriction instead; and
 - Where we no longer need the personal data, but you require the information to establish, exercise or defend a legal claim.
- **The right to data portability** – You have the right to request that we transfer your personal data to a third-party. This right only applies to automated personal data which you have either provided your consent for us to use or where we have used your personal data to perform a contract with you.
- **Rights in relation to automated decision-making including profiling** – you have the right to question decisions being made about you without any human involvement.

If you would like to exercise any of these rights, please contact us at enquiries@centralcoop.co.uk

10. Changes to this Privacy Notice

We may update this Privacy Notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions in relation to this notice, please contact our DPO at enquiries@centralcoop.co.uk

11. Not happy?

Please let us know if you are unhappy with how we have used your personal data by contacting our DPO.

As stated in The Data (Use & Access) Act 2025, you have the right to lodge a data protection complaint with us, should you be unhappy with the way we have processed your personal data.

Your complaint will be managed and responded to by our Data Protection Officer (DPO). Their role will be to conduct an independent investigation into the grounds for your complaint and provide an outcome to you. Your complaint will be responded to with a final written response within 30 days of receipt.

Should you wish to make a data protection complaint, this can be done by contacting the DPO in the following ways:

Email: enquiries@centralcoop.co.uk

If you are dissatisfied with how your data protection complaint has been managed, you also have the right to lodge a complaint with The Information Commissioner's Office (ICO). We would be grateful for the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

You can find their contact details below:

Address: Information Commissioner's
Office,
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire,
SK9 5AF

Telephone: 0303 123 1113