

IP Inclusive Management Data Protection Policy



Formal details

1. IP Inclusive Management is an unincorporated association. We oversee activities carried out under the IP Inclusive banner. This Data Protection Policy applies to all such activities, including those of IP Inclusive's associated groups: the *Women in IP* group, *IP Out*, *IP & ME*, *Careers in Ideas*, and the Equality, Diversity and Inclusion (EDI) Charter working group.
2. The association is a data controller within the meaning of the General Data Protection Regulation (Regulation (EU) 2016/679) (the GDPR). We are registered as a data controller with the Information Commissioner's Office (ICO), under the reference ZA328855.
3. We can be contacted c/o The Chartered Institute of Patent Attorneys, 2nd Floor, Halton House, 20-23 Holborn, London EC1N 2JD or by emailing our Secretary at ipimsecretary@gmail.com. Correspondence regarding any aspect of our data protection policy should be sent to The Data Protection Officer either at the above address or by email at ipinclusivedata@gmail.com.
4. In view of the size of our association and the nature and scope of its activities, the role of Data Protection Officer is discharged by the association as a whole.
5. Our Privacy Notice (Annex I) sets out key information, about our data processing activities, for the individuals whose data we process. The Privacy Notice is available on our websites and to any person on request. We bring it to the attention of everyone who provides personal data to us, or whose personal data we intend to process in a new way or for a new purpose.

The purposes for which we process personal data

6. We hold and process certain limited personal data (see 12 below) about IP Inclusive supporters, for purposes which we make clear when the data is provided to us and in our Privacy Notice.
7. Those purposes are:
 - a. When a person subscribes to one of our mailing lists, or signs up to the IP Inclusive Equality, Diversity and Inclusion (EDI) Charter: keeping the person informed about our activities and the support we need to continue them, and about issues and resources relevant to equality, diversity and inclusivity in the IP professions.
 - b. When a person registers to attend an IP Inclusive event (which includes an event co-organised by IP Inclusive and one or more third parties): organising the event and communicating with them about it, including with appropriate follow-up materials.
 - c. When a person communicates with us in any other way (including to make or offer a donation to an IP Inclusive project, or to ask us to publish an announcement on our

Careers in Ideas website): responding to and where appropriate acting on their communication.

Our lawful basis for processing personal data

8. The lawful basis on which we hold and process personal data is our legitimate interests in (a) furthering IP Inclusive's objects of promoting equality, diversity and inclusivity in the IP professions, and (b) supplying a service requested from us (for example access to an event, the publication of an announcement, or – in the case of a mailing list – the provision of information and updates) by the person who provides the data.
9. The data and the ways in which we process it are limited to what we believe is necessary in order to meet these interests. We have satisfied ourselves that there is no less intrusive way to do so in an efficient and appropriately secure manner.
10. We only hold and process data which has been provided to us voluntarily for one or more of the purposes set out in 7a to 7c above.
11. We have a responsibility to protect the interests of the people who provide us with their personal data. We believe that:
 - a. we only use people's personal data in ways that they would reasonably expect;
 - b. we do not use people's personal data in ways they would find intrusive or which could cause them harm; and
 - c. the interests of the people concerned do not conflict with or override our legitimate interests as set out in 8 above.

The types of data we process

12. In order to fulfil the purposes set out in 7a to 7c above, we hold and process the following data.
 - a. When a person subscribes to one of our mailing lists: their name and email address and optionally their organisation and/or job title.
 - b. When a person signs up to the IP Inclusive EDI Charter: the name and address of the signatory; the name, email address and telephone number of a person authorised to make the Charter commitments on behalf of the signatory; and the name, email address and telephone number of the signatory's appointed EDI Officer.
 - c. When a person registers to attend an IP Inclusive event: their name and email address and optionally their organisation and/or job title.
 - d. When a person communicates with us in any other way: their name, contact details and other information sufficient for us to respond to and where appropriate act on their communication.
13. We do not hold or process financial, legal or medical information about people, or information about potentially sensitive personal characteristics such as age, ethnicity, gender, sexuality or disabilities.

How we use the data – general

14. Other than in the circumstances described in 17 to 20 below, in which publicly available online services enable us to operate more efficiently within our limited administrative resources, we do not share personal data with third parties.
15. We do not use or share it for marketing purposes.
16. We do not use automated decision making or profiling to process it.

How we use the data – mailing lists

17. For the purposes set out in 7a above, we may collect, store, manage and/or use the data through a third party marketing automation platform such as MailChimp®. Such platforms allow us to create, send and manage communications with subscribed email addresses.
18. Where we do this, we will inform the relevant subscribers. We will advise such subscribers to check the third party's privacy notices and to tell us if they do not agree to our allowing the third party to receive and process their data and to send communications to them on our behalf.

How we use the data – event registrations

19. For the purposes set out in 7b above, we may share the data provided to us with trusted third parties which are co-organising or hosting the event.
20. Where a person registers to attend an IP Inclusive event via a third party online event organising platform such as Eventbrite®, or through a third party which co-organises an event with us, that person will be providing data directly to the third party under the terms of the third party's own data protection policies. The third party will allow us access to the data for the purposes set out in 7b above and again, we may share the data with trusted third party event hosts and organisers.

How we store personal data

21. We store personal data securely and take reasonable and appropriate measures to protect it from loss, damage and misuse, and from unauthorised access, disclosure, alteration and destruction.
22. We password-protect it and keep the passwords secure.
23. We implement reasonable and appropriate back-up measures so as to allow it to be restored if lost or damaged, with minimum disruption to the people who provided us with the data and to the services we supply to them.
24. Access to the data is restricted to senior IP Inclusive volunteers and IP Inclusive Management members who need it (a) for one or more of the purposes set out in 7a to 7c above, (b) to respond to a request, query, concern or complaint relating to our data processing activities, or (c) to demonstrate our compliance with data protection laws.
25. We keep a separate data set for each of our mailing lists, events, projects and campaigns. We do not merge or cross-reference these data sets.
26. For the avoidance of doubt, data associated with communications of the type referred to in 7c above is not stored or processed as part of a data set, unless linked with a specific IP Inclusive project, event or campaign.

27. The IP Inclusive Updates mailing list is managed by IP Inclusive Management. Each of the other data sets is managed by a specific IP Inclusive group, with oversight by IP Inclusive Management. In order to exercise this oversight, IP Inclusive Management has access to all the data sets.
28. Where we store or process data through a third party such as those referred to in 17 to 20 above, points 21, 22, 24, 25 and 27 still apply to its security and accessibility.

Data storage and processing outside of the UK

29. Where we store or process data through a third party such as those referred to in 17 to 20 above, or in an internet-based storage system, the data may be stored and/or processed on third party servers outside of the UK.

Our data retention policy

30. We only hold and access personal data for as long as we need it to fulfil one or more of the purposes set out in 7a to 7c above or to demonstrate our compliance with data protection laws.
31. In the case of a mailing list, or data provided on signing up to the IP Inclusive EDI Charter, we do not delete the data until the person who provided it asks us to do so, for example by unsubscribing from the mailing list.

Record keeping

32. We keep records of when personal data is provided to us and in what context, including the information we provided to the data subject at that point.
33. We keep a record of each activity (for example an email communication) for which we make use of personal data.
34. We keep a register of the data sets we hold. For each we record the type of data it contains; the purpose(s) for which and the lawful basis on which the data is held and processed; which part of IP Inclusive manages it; who has access to it; and if applicable when it is to be deleted.
35. We will keep these records for so long as we deem appropriate in order to demonstrate our compliance with data protection laws.

Third party data controllers and data processors

36. Where we store or process personal data through a third party in one of the ways referred to in 17 to 20 or 29 above, we satisfy ourselves that the third party's data protection policies are in line with the regulatory requirements of the GDPR and with our own data protection standards, and ideally that it participates in the EU-U.S. Privacy Shield Framework or a similar certification framework.
37. We tell people who provide their personal data to us the identities of any third parties which will be involved in its handling, and encourage them to check the third party's data protection policies before providing their data.
38. We comply with the written terms of the contract between the third party and ourselves as a user of their services.

39. As far as is feasible we limit the amount of personal data which we allow third parties to handle, and ensure that their access to and use of the data (a) does not go beyond what is necessary to allow us to fulfil one or more of the purposes set out in 7a to 7c above, and (b) is limited to what the person who provided the data to us would reasonably expect.

Data subjects' rights

40. A person who provides their personal data to us for one or more of the purposes set out in 7a to 7c above has the following rights in connection with that data:
- to be informed what personal data we hold about them, the basis on which we obtained it and how we will use it;
 - to access and if necessary amend the data;
 - to have it deleted from our records, if it is no longer necessary for the purpose(s) for which they originally provided it, including by unsubscribing from a mailing list on which it is held; and
 - in certain circumstances provided for in the GDPR, to restrict our processing of the data.
41. If requested to restrict processing of someone's personal data, we will move the data to a separate location to enable us to process it in the restricted manner.
42. A person who provides their personal data to us for one or more of the purposes set out in 7a to 7c above also has the right to object to our processing that data on grounds relating to their particular situation. In such a case, we will immediately stop processing the data, unless we can demonstrate compelling legitimate grounds for continuing, which override the person's individual interests, rights and freedoms, or if the continued processing is necessary to establish, exercise or defend a legal claim.
43. The rights referred to in 40 to 42 above can be exercised at any time by writing to The Data Protection Officer at ipinclusivedata@gmail.com or at our London address. We will respond promptly and without charge.

Complaints handling

44. A person who provides their personal data to us has the right to complain or raise a concern about the way in which we store or process it.
45. Complaints and concerns should be sent in writing to The Data Protection Officer at ipinclusivedata@gmail.com or at our London address.
46. We will do all we can to resolve such issues, promptly and without charge. If a complainant is not satisfied with our response, they can refer their complaint or concern to the ICO.

Personal data breaches

47. In the event of a personal data breach which we believe is likely to represent a risk to the relevant data subjects' rights and freedoms, we will:
- report it to the ICO as soon as is feasible;
 - notify the relevant data subjects as soon as feasible, and tell them what we know about the nature and extent of the breach and its potential implications; and

- c. subsequently report to those people on the action we took in response to the breach.
48. A personal data breach is a security incident that has affected the confidentiality, integrity or availability of personal data provided to us, for example accidental or unauthorised disclosure of, access to, use of, or alteration or deletion of, the data.
 49. If an IP Inclusive supporter or volunteer, or any person who has provided data to us, becomes aware of a breach affecting the data we handle, they should notify us immediately.
 50. The individual(s) who manage the data set(s) affected by a breach will assist us to the best of their abilities in responding appropriately.
 51. We will keep a record of any personal data breach and of our response to it.

The risks associated with our data processing activities

52. We take our responsibilities as a data controller seriously. We treat the data provided to us with respect, and take all reasonable steps to safeguard its security and proper use and the rights, freedoms, privacy and security of the people who provided it, to whom we regard ourselves as accountable.
53. We have conducted a basic assessment of the level of risk associated with our data processing activities, the outcomes of which are set out in Annex II.
54. We believe that the size of our association, and the nature and scope of its activities, do not warrant a more detailed data protection impact assessment at this stage.

Training and review

55. The members of IP Inclusive Management will share access to information, updates and training on data protection issues which are available to them through their own organisations, in particular changes to data protection law and practices which could affect data processing activities carried out under the IP Inclusive banner.
56. We will review this policy annually, or more frequently if necessary in view of changes in our activities or circumstances or in applicable data protection laws.
57. Our review will include:
 - a. a reassessment of the lawful basis on which we handle personal data, the purposes for which we do so, and associated legitimate interests;
 - b. a reassessment of our need for an individual Data Protection Officer and for a formal data protection impact assessment; and
 - c. a review of the suitability of the third parties through which we store or process data.
58. Following each review, we will delete data which is no longer needed either for any of the purposes set out in 7a to 7c above or to demonstrate our compliance with data protection laws.
59. We will keep our volunteers and supporters, and the people whose personal data we handle, informed of material changes to our data protection policy and data handling systems.

Annex I

IP Inclusive Management Privacy Notice

This Privacy Notice sets out key information about the types of personal data we process; the purposes for which and lawful basis on which we do so; and your rights in connection with the data we process about you. If you want to know more about our data processing activities, you can read our full Data Protection Policy on the IP Inclusive website, www.ipinclusive.org.uk.

Formal details about us

This Notice applies to data processed by IP Inclusive generally and by its associated groups: the *Women in IP* group, *IP Out*, *IP & ME*, *Careers in Ideas*, and the Equality, Diversity and Inclusion (EDI) Charter working group. In each case, activities carried out under the IP Inclusive banner are overseen by IP Inclusive Management, which is an unincorporated association. IP Inclusive Management is a data controller within the meaning of the General Data Protection Regulation (Regulation (EU) 2016/679) (the GDPR). It is registered as a data controller with the Information Commissioner's Office (ICO), under the reference ZA328855.

Correspondence regarding our data protection policies should be addressed to The Data Protection Officer, either at IP Inclusive Management, c/o The Chartered Institute of Patent Attorneys, 2nd Floor, Halton House, 20-23 Holborn, London EC1N 2JD, or by email to ipinclusivedata@gmail.com.

The purposes for which we process personal data

IP Inclusive Management handles personal data about IP Inclusive supporters for the following purposes.

1. If you subscribe to one of our mailing lists, or sign up to the IP Inclusive EDI Charter: keeping you informed about our activities and the support we need to continue them, and about issues and resources relevant to equality, diversity and inclusivity in the IP professions.
2. If you register to attend an IP Inclusive event (which includes an event co-organised by IP Inclusive and one or more third parties): organising the event and communicating with you about it, including with appropriate follow-up materials.
3. If you communicate with us in any other way (including to make or offer a donation to an IP Inclusive project, or to ask us to publish an announcement on our *Careers in Ideas* website): responding to and where appropriate acting on your communication.

We will not use your personal data for marketing. Nor will we use automated decision making or profiling to process it.

Sharing personal data with third parties

We will not share your personal data with anyone else, other than in the following situations where publicly available online services enable us to operate more efficiently within our limited administrative resources.

If you subscribe to one of our mailing lists, or sign up to the IP Inclusive EDI Charter, we may collect, store, manage and/or use your data through a third party marketing automation platform such as MailChimp®. Such platforms allow us to create, send and manage communications with subscribed email addresses. We will tell you if this applies to your data, and advise you to check the third party's privacy notices so that you can let us know if you do not want us to allow the third party to receive and process your data and to send communications to you on our behalf.

If you register to attend an IP Inclusive event, we may share your data with trusted third parties which are co-organising or hosting the event. Please note that where you register to attend an IP Inclusive event via a third party online event organising platform such as Eventbrite® or Billetto®, or through a third party which co-organises an event with us, you will be providing your data directly to them under the terms of their own data protection policies. You should therefore check their privacy notices before submitting your data. They will allow us access to the data for the purposes set out in point (2) above and again, we may share the data with other trusted third party event hosts and organisers.

These third parties may store and/or process your data outside of the EU. We satisfy ourselves that their data protection policies are in line with the regulatory requirements of the GDPR and with our own data protection standards, and ideally that they participate in the EU-U.S. Privacy Shield Framework or a similar certification framework.

Our lawful basis for processing personal data

The lawful basis on which we hold and process your data is our legitimate interests in (a) furthering IP Inclusive's objects of promoting equality, diversity and inclusivity in the IP professions, and (b) supplying a service you requested from us (for example access to an event, the publication of an announcement, or – in the case of a mailing list – the provision of information and updates) when you provided the data.

How we handle personal data

We will store your personal data securely and take reasonable and appropriate measures to protect it from loss, damage and misuse, and from unauthorised access, disclosure, alteration and destruction. We will only hold and access it for so long as we need it to fulfil the relevant purpose(s) or to demonstrate our compliance with data protection laws.

Your rights

You have certain rights in connection with the personal data we handle about you. You can find out more about these rights from the ICO, at <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>. They include the rights:

- to be informed what personal data we hold about you, the basis on which we obtained it and how we will use it;
- to access and if necessary amend the data;
- to have it deleted from our records, if it is no longer necessary for the purpose(s) for which you originally provided it;

- in certain circumstances provided for in the GDPR (see <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-restrict-processing/>), to restrict our processing of the data; and
- to object to our processing the data on grounds relating to your particular situation.

You can exercise these rights at any time by writing to The Data Protection Officer at ipinclusivedata@gmail.com or at our London address above. We will respond promptly and without charge.

Complaints

We do not believe that our data processing will have any adverse effects on you and we hope you will be satisfied by the precautions we have taken and the explanations we have provided.

However, you have the right:

- to complain or raise a concern about the way in which we store or process your personal data.

Please send your complaint or concern in writing to The Data Protection Officer at ipinclusivedata@gmail.com or at our London address above. We will do all we can to resolve the matter for you, promptly and without charge. If you are not satisfied with our response, you can refer your complaint or concern to the ICO: see <https://ico.org.uk/for-the-public/raising-concerns/>.

Personal data breaches

If you become aware of a personal data breach, please immediately notify The Data Protection Officer at ipinclusivedata@gmail.com so that we can take appropriate action. A personal data breach, in this context, is a security incident that has affected the confidentiality, integrity or availability of personal data you provided to us, for example accidental or unauthorised disclosure of, access to, use of, or alteration or deletion of, the data.

Annex II

Basic data protection risk assessment

- i. We hold and process only limited personal data about IP Inclusive supporters, for purposes which we make clear when the data is provided and in our Privacy Notice.
- ii. This data is limited to the minimum we believe is necessary in order to satisfy our legitimate interests, as set out in point 8 of our Data Protection Policy, and to fulfil the purpose(s) for which it was provided.
- iii. We are satisfied that:
 - a. we only use people's personal data in ways that they would reasonably expect;
 - b. we do not use people's personal data in ways they would find intrusive or which could cause them harm; and
 - c. the interests of the people concerned do not conflict with or override our legitimate interests as set out in point 8 of our Data Protection Policy.
- iv. We only handle data which is provided voluntarily, either directly to us or to a trusted third party such as an online event organising platform. We do not purchase personal data from other parties.
- v. We do not believe the data we handle is sensitive, being limited to basic contact details and affiliations which are typically in the public domain. We do not hold or process financial, legal or medical information about data subjects, or information about potentially sensitive personal characteristics such as age, ethnicity, gender, sexuality or disabilities.
- vi. In view of the nature and amount of data we handle, the circumstances in which we collect it and the ways in which we process it, we do not therefore believe there is a high risk of adverse effects for data subjects, or for their individual rights and freedoms, through our data processing activities.
- vii. We do not believe there is a high risk of adverse effects for data subjects, or for their individual rights and freedoms, in the event of a personal data breach. We will nevertheless respond promptly and transparently to any data breach, with due regard to the rights and freedoms of the relevant data subjects.
- viii. We expect the occurrence and seriousness of complaints and concerns about our data processing activities to be low.