

# **Privacy policy**

The Community Therapists Network (CTN) is an organisation of allied health professionals that is under the direction of a steering committee, and managed by Innervate Ltd. The CTN provides information, training and education to a network of therapists working within rehabilitation and intermediate care settings and who work across education, health, mental health and social care (local government).

The Community Therapists Network, as managed by Innervate Ltd, is committed to protecting and respecting your privacy in accordance with our obligations under data protection legislation. With effect from 25th May 2018, the main data protection law will be the General Data Protection Regulation (GDPR) as supplemented by the Data Protection Act 2018 and related laws.

This Privacy Policy details the type of information that you provide the CTN and we process as a professional organisation about you through your use of our website <a href="www.communitytherapy.org.uk">www.communitytherapy.org.uk</a>, including any information you may provide when you register to join, or an event, sign up to our newsletter or make an email enquiry. It also details what we do to keep your information secure, your rights and how you can contact us with regards to the information that we hold.

The CTN promises to respect any personal data you share with us, or which we obtain from other organisations and keep it safe. We aim to be clear when we collect your data and will not do anything you would not reasonably expect.

### Information we may collect from you

In order to fulfil CTN membership benefits, administer our website, provide email alert services and consult on our work, Innervate Ltd occasionally captures and processes personal data in various ways.

• Site access: As you use our website, we may automatically collect technical data about your equipment, browsing actions and usage patterns. We collect this data by using cookies, server logs and similar technologies. We use 'cookies' to enhance your experience on our website. When you are accessing our website, your device may provide us with information about the device you're using. The Google Analytics tracking tool uses a number of cookies to collect information and report website usage statistics and does so without personally identifying individual visitors to Google or CTN. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly.

Sometimes, we will need to collect and process your personal data as it is part of a contract or agreement which you have entered into:

- Events hosted by the CTN: If you book to attend a CTN managed event, it will be organised and run by Innervate Ltd. Your email address and other information given when booking will be held on Innervate Ltd system for the purposes of event administration.
- **Mailing List**: If you have opted-in to our mailing list or you are a registered with the CTN via registration page, we will collect and process your personal information to provide you with information about forthcoming CTN events, publications, updates or key pieces of work etc.

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years, plus the current accounting year, after you cease being customers for tax purposes.

If you make a payment to join the Society, your card information is not held by us, it is collected by our third party payment processors, who specialise in the secure online capture and processing of credit/debit card transactions, as explained below.



# How is your information used?

We may use your information to:

- process the joining request that you have submitted;
- to carry out our obligations arising from any contracts entered into by you and us;
- seek your views or comments on the services we provide;
- notify you of changes to our services;
- send you communications concerning the activities of the Society and that may be of interest to you. These may include information about our events, news concerning our supporting organisations;

### **Third Parties**

We will never share your data with third parties, unless where it is necessary to enable us to comply with legal obligations or where permitted by law. We may also receive personal data about you from various third parties and public sources.

Third parties might include:

- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.
- We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions. We have put in place appropriate security measures to protect your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.
- We have put in place procedures to deal with any suspected personal data breach and will notify you
  and any applicable regulator of a breach where we are legally required to do so.

Third Party Product Providers we may work in association with: In the future we may work with third party product providers to bring you a range of quality and reliable products and services designed to meet the needs of our members. If you enquire about or purchase one or more of these products, the relevant third party product provider will use your details to provide you with information and carry out their obligations arising from any contracts you have entered into with them. In some cases, they will be acting as a data controller of your information and therefore we advise you to read their Privacy Policy. These third party product providers will share your information with us which we will use in accordance with this Privacy Policy.

When you are using our secure online payment pages, your payment is processed by a third party payment processor, who specialises in the secure online capture and processing of credit/debit card transactions. If you have any questions regarding secure transactions, please contact us.

#### Access to information

We review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil our statutory obligations. We will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us.

Under General Data Protection Regulation (GDPR) you have the right to request access to your personal data and ask for it to be amended or removed. You can see more about these rights at: <a href="https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/">https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/</a>



If you wish to exercise any of the rights, please email us at <a href="mailto:info@communitytherapy.org.uk">info@communitytherapy.org.uk</a>

## Website Security

When you provide the CTN with personal information we take steps to ensure that it's treated securely.

Non-sensitive details (your email address, etc) are transmitted normally over the internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of the information you transmit to us and do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given (or where you have chosen) a password which enables you to access certain parts our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

## Changes to our Privacy Policy

The CTN may update this privacy policy at any time, so please check this page regularly to ensure you are kept up-to-date.

### Contact

If you have any queries regarding this <u>Privacy Policy</u> please contact the CTN on: <u>info@communitytherapy.org.uk</u> or write to us at the following address:

Community Therapists Network, c/o Innervate Ltd, 117 Waterloo Road, London SE1 8UL

This Privacy Policy was last updated in May 2020.