



# General Data Protection Regulations - Privacy Notice

The document is *SCAP Privacy Notice 2018 – 2*, and supersedes all other Privacy or Data Protection notices issued by us.

## **Purpose of this privacy notice**

This privacy notice aims to give you information on how Sussex Counselling and Psychotherapy collects and processes your personal data, including any data you may provide through our website when you fill in any website forms, and/or contact us via the website.

It is important that you read this privacy notice together with any other privacy notice on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements other notices and is not intended to override them.

## **Controller**

Sussex Counselling and Psychotherapy is the controller and responsible for your personal data collectively referred to as *SCAP we, us or our* in this privacy notice.

We have a data privacy officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights (see below), please contact the DPO using the details set out below.

## **Contact Details**

Full name of legal entity: Sussex Counselling and Psychotherapy

Name or title of DPO: SCAP Secretary

Email address: [dpo@sussex-counselling.co.uk](mailto:dpo@sussex-counselling.co.uk)

## **Your duty to inform us of changes**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us. **As registered members you are able to log in to the members area and edit your profile at any time.**

## Third-party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. (usually using ‘Cookies’) We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## Data collected and held by us

Personal data, or personal information, means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal data about you for the sole purposes of your membership, and/or to email you periodic news and information relevant to your subscriptions or general topics of interest. We have grouped this data together as follows:

- **Identity Data for the purposes of Membership:** which includes title, first name, last name, username (but not password), feedback from any survey responses you may complete and records of emails sent direct from the website.
- **Contact Data:** includes billing address, email address and telephone numbers.
- **Transaction Data:** includes details about payments from you for Membership registration and seminar bookings. This includes date and type of payment process, but we do not hold credit card, bank details or any other payment information. Transactions for you membership and event/seminar payments made by you are made with PayPal and BACS and we do not hold these personal details.
- **Communications Data:** includes your preferences in receiving information from us through email and newsletters as well as hard copy Members magazines and directory.
- **Practitioner Listing Membership:** All data listed on our website, and in our hard copy directory is supplied and updated by you personally and we do not edit information. This data can include your name and contact details, services you offer and fees you may charge. This data is listed on the public area of our website, and thus available to anyone visiting the site. SCAP reserves the right to remove any listing if we feel it is not in keeping with the interests of Sussex Counselling & Psychotherapy or it's readers/membership.
- **Advertising With Us:** What's on in Sussex, or Members only Jobs Page. You supply the wording and contact details for us to list on our website, and to send out by email, and the information on the website is accessible by the general public.
- **Non Members E-New Subscription:** Name and Email address only.
- **Special Categories**
- We do not collect any Special Categories of Personal Data about you (for example details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, or information about your health). However, If you are a Practitioner Listing member, you may have included some of this information when you manually complete your own listing details. You may edit or remove this manually at any time.

## **If you fail to provide personal data**

Where we need to collect personal data in order to manage your membership, and you fail to provide that data when required on the registration form, we may not be able to perform the contract we have or are trying to enter into with you (e.g. to provide you with membership services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time. This will also include failure to renew a Membership you are subscribed to.

## **How We Collect Data**

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Identity and contact by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply for Membership of SCAP;
- register on our website as a non member;
- create an account with us;
- subscribe to our service or publications;
- enter a survey or give us some feedback.

**Automated technologies or interactions.** We do not collect data on you by using cookies but when you register for an event, email us from the website, or subscribe to our Article's of Interest page your name and email address will be registered with our database.

## **How we use your data**

We will only use your personal data in the following circumstances:

- When we are managing your membership, or other service you have entered into with us, including advertising in the What's on in Sussex, or Jobs Page.
- For the purposes of advertising direct to you any scheduled seminars or workshops for continuing professional development.
- Where we need to comply with a legal or regulatory obligation.

## **Purposes for which we will use your personal data**

- Maintaining your membership account
- Promotional offers from us
- We may use your Identity, and Contact data, to email you articles of interest from the website, or relating to seminars. In each case, you may opt out of receiving these emails.

### **Third-party marketing**

We will not share your data with any organisation or marketing company without your express written permission. However, if you list your Practitioner details or advertising details on the website this information will be in the public domain, and we have no control over how, or by whom it is used.

### **Opting out**

You can ask us to stop sending you email messages at any time by contacting us or by clicking on the opt out links at the foot of each email.

Where you opt out of receiving these messages, this will not effect or apply to personal data provided to us by you as a result of Membership subscription of registration to an event or seminar.

### **Cookies**

Our website does not use cookies by default, but if you select 'remember me' when you log in a cookie will be set on your own computer to remember the webpage you visited. You can deactivate cookie services in your computer browser, but some websites require the use of cookies.

#### ***Cookies Explanation***

*A Cookie is a small piece of data sent from a website and stored on the user's computer by the user's web browser while the user is browsing. Cookies were designed to be a reliable mechanism for websites to record the user's browsing activity (including clicking particular buttons, logging in, or recording which pages were visited in the past). They can also be used to remember arbitrary pieces of information that the user previously entered into form fields such as names, addresses, passwords, and credit card numbers.*

### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. In which case we would advise you first.

### **Data Security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. The website is on a secure server, and all personal data (other than that given by you for public view), is encrypted. In addition, we limit access to your personal data to those (Committee members, or SCAP agents) who have a need to know. They will only process your personal data on our

instructions and they are subject to a duty of confidentiality. An example of this is supplying your postal address to send out hard copy magazines.

### **Data Retention**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for.

We will purge/delete your personal data from our database when your membership account has not been renewed after a period of 2 weeks from the expiry date, or when you contact us and ask us to remove your account.

Advertising will be removed once the contract period has ended, and job vacancies will be removed after the closing date specified or when instructed to do so whichever is the sooner.

### **Your legal rights**

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

- Request to see what personal data we hold.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us.

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights).

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

**Time limit to respond**

We try to respond to all legitimate requests within 2 weeks.