#### PRIVACY POLICY

Last Updated: 29th May 2018

Thank you for visiting Pelvic, Obstetric and Gynaecological Physiotherapy (POGP)

Your privacy is important to us. This Privacy Policy is where we explain to you what personal information is collected when you visit our site, become a member of our association, attend one of our events, or submit information to us. This policy also explains how your personal information is collected, how we may use that information, where we store it, how long we store it for, and how we protect it. We will also explain your rights in relation to your personal information.

Please read the following carefully to understand our views and practices regarding your personal information and how we may collect it and treat it.

For convenience, we have divided our data protection policies into three separate pages:

# 1. Our Privacy Policy

This policy explains generally how we collect, use, store, and protect your personal information.

# 2. Our Cookie Policy

Our Cookie Policy is available here <a href="http://www.csp.org.uk/about-site/cookies">http://www.csp.org.uk/about-site/cookies</a> explains more about how we may collect personal information about you via cookies (it also explains what cookies are).

## 3. Our Retention Policy

You can find out how long we may hold onto your personal information and is available on the POGP website.

If you have any questions please do not hesitate to contact our appointed Data Privacy Officers, Fitwise Management Limited, at <a href="mailto:privacyofficers@fitwise.co.uk">privacyofficers@fitwise.co.uk</a> or, if you prefer to call or write to us, then you can find our contact details at the bottom of this page.

## **WHO WE ARE**

We are the Pelvic, Obstetric and Gynaecological Physiotherapy Association a UK based Professional Network affiliated to the Chartered Society of Physiotherapy. Company number RC000107

But, for the purposes of this Privacy Policy, it's just easier if we refer to ourselves as "we".

# WHAT THIS PRIVACY POLICY GOVERNS

This Privacy Policy applies to our site www.pogp.csp.org.uk, our membership services, any communications that we may send to you in connection with your membership with us, when you register for any of our events and any other services that we may provide to you (we'll just call these "our services" for short).

In the context of this Privacy Policy "personal information" means information which, on its own or in combination with other information, can be used to identify you, in particular by reference to an identifier such as your name, your address, banking information, or location data.

Provided that you consent to us collecting your personal information when you visit our site, become a member of our association, attend one of our events, or opt-in to receive communications from us then this Privacy Policy will govern how we may use that personal information.

Because we are an organisation located in the United Kingdom the personal information that you give us or that we collect from you will be held under UK data protection legislation (but we'll just refer to this as "the legislation"). The legislation requires that we tell you that we are a data controller for your personal information or, in other words, we determine the purposes for which and the manner in which any of your personal information are, or are to be, processed by us.

## HOW YOU CONSENT TO US COLLECTING YOUR PERSONAL INFORMATION

Depending on how you interact with us we may seek to obtain your consent in a number of different ways. We will determine which method is more appropriate but, in any event, we will always ask your express consent before collecting your personal information.

### Our website

Our website does not have a cookie pop up. The information we may collect about you via cookies can be found here <a href="http://www.csp.org.uk/about-site/cookies">http://www.csp.org.uk/about-site/cookies</a>. This also includes an explanation on how to block cookies on our website.

There is still some information that we may automatically collect about your computing device when you visit our site. This normally isn't personal information but rather technical information sent by your device and used to connect your computer, tablet, or mobile device to the Internet, including your browser type and version, the time when you visit our site, your time zone setting, certain browser plug-in types and versions, operating system and platform. This type of information is sent by you to our site automatically and it isn't something that we can prevent. We only use this information to administer our site including troubleshooting, load testing, traffic throughput, data analysis, performance testing, and for anonymised research and statistics purposes that we only use internally.

### **Membership**

If you are one of our association members, or would like to become a member of our association, then during your registration process we will ask you for certain types of personal information. Before you can complete the registration process you will be asked to read and understand this Privacy Policy and accept its terms. The information that we ask for as part of your registration process will only be used for the purposes of your membership with the association and we will not ask you for information that is irrelevant.

However, we will need you to accept the terms of our Privacy Policy in order to offer you membership with our association. If you do not consent to us collecting this personal information then we cannot provide you with a membership. It is important to understand that we require this information in order to manage your membership, stay in touch with you about association business, events, and monitor your membership status.

#### **Our Events**

You may have come across our association while attending an event and would like to become a member. Depending on the type of event you attended you may be asked to register with our association through our site or you may be asked to complete a paper-based form. If you are asked to register through our site then you will be prompted to read and accept this Privacy Policy. However, if you have been given a paper-based form then this Privacy Policy should be attached to it and you will be asked to confirm your express consent to us collecting your personal information when completing the form.

We will only hold your personal information as detailed in our Retention Policy.

### INFORMATION WE MAY COLLECT

If you consent to us collecting your personal information then we may process the following data about you:

# Information you give to us:

You may give us personal information about you by filling in forms on our site or by corresponding with us by phone, e-mail or otherwise. This includes information you may provide to us when you register to use our site, subscribe to our services, search our site, attend our events, participate in any discussion boards or other social media functions on our site, enter a competition, promotion or survey, and when you report a problem with our site.

The information you give us may include:

- Your name;
- Address:
- E-mail address:
- Phone number;
- IP address:
- Financial and credit card information;
- Dietary requirements
- Access requirement
- Personal description: and
- Photographs and/or videos.

# Information we collect about you:

## Our website:

When you visit our site we may collect information about you, including which pages you have visited (including date and time) which services and pages you viewed or searched for, page response times, download errors, files downloaded, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from a page and any phone number used to call our customer service number.

The purpose of this information is to allow us to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, improving our site to ensure that content is presented in the most effective manner for you and for your computer, and as part of our efforts to keep our site safe and secure.

## Membership

When you become a member of our association we may, in addition to the information above, collect statistical information about you. For example your areas of professional interest and speciality, and your location in order to help us provide you with the maximum value out of your membership with us. In most cases we will keep statistical information anonymous and we do not use this information for marketing purposes. However, we may retain it for historical, archival, and research purposes in order to further our remit and association goals.

We may also combine personal information that you have given us or we may have collected from you when you attended our events. We may combine the personal information that you pass to us with the information that we have collected about you as part of your engagement with our association. For example, this may include using photographs and videos that we collected about you while you attended one of our events. For the avoidance of doubt, we will only combine personal information that we believe is related and relevant to the purposes of growing and developing the legacy and history of our association and is relevant for archival purposes.

#### Information we receive from other sources:

Data collected from any of the other sites, services, or events that we operate may be shared internally and combined with data collected on this site and through your membership with us. We are also working closely with third parties (including, for example, sub-contractors in technical, payment and delivery services, analytics providers, search information providers, and credit reference agencies) and may receive information about you from them.

The information that we receive from these third parties will normally be in connection with your membership. For example, we may receive RSVP information about you if we use a third party events booking platform or if we use a third party payment gateway such as WorldPay, PayPal, or Stripe to process a payment from you. In these circumstances the information is being received from these sources because it is related to your membership with us or the services that you receive from us.

We do not knowingly pass your personal information to third parties for the purposes of marketing without your express consent.

Communication, engagement and actions taken through external social media platforms that we participate in are subject to the terms and conditions as well as the privacy policies held with each social media platform respectively. We advise our visitors and members to use social media platforms wisely and communicate / engage upon them with due care and caution in regard to their own privacy and personal details. We will never ask for personal or sensitive information through social media platforms and encourage our visitors and members wishing to discuss sensitive details to contact us through our primary communication channels such as by telephone or email.

# Information you may pass to third-parties outside our control:

If we use a third party payment gateway such as WorldPay, PayPal, or Stripe then you may pass your financial details to these companies in order to process payment. In these circumstances we do not receive any of your financial information, rather, we receive confirmation as to whether your payment was successful or not.

## Information we may pass to third-parties

Depending on how you engage with us, we may need to pass certain types of personal information about you to select third parties. We only pass this information to these third parties if it is necessary for the purposes of the services that we offer you and as part of your association membership. For example, if you register to attend one of our events we may need to pass your information to our badging partner in order to generate your badge.

The current third parties that we use are as follows:

1) Company Name: Fitwise Management Ltd.

Company Registered Office: Blackburn House, Redhouse Road, Seafield,

Bathgate, West Lothian, EH47 7AQ

Categories of Data to be processed: Membership and Event information

Territories where Data may be processed: United Kingdom

2) Company Name: SurveyMonkey Inc.

Company Registered Office: One Curiosity Way, San Mateo, CA 94403

Categories of Data to be processed: email address

Territories where Data may be processed: United States of America, and European

Economic Area

3)

Company Name: Amember software hosted by webdeveloper

Richard Pavey

Company Registered Office: 12 South Charlotte Street, Edinburgh EH2 4AX

Company Registered Number: Sole trader

Categories of Data to be processed: All membership information

Territories where Data may be processed: United Kingdom

4) Company Name: Events Air (Part of Centium Software)

Company Registered Office: 21-23 Croydon Road, Caterham, Surrey, CR3 6PA

Company Registered Number: 08440654

Categories of Data to be processed: Event attendees enter in all their event registration

details

Territories where Data may be processed: European Economic Area

5) Company Name: Izettle

Company Registered Office: Regeringsgatan 59, 111 56, Stockholm, Sweden

Company Registered Number: 556806-0734

Categories of Data to be processed: onsite payment at events, individual to enter in their

own details

Territories where Data may be processed: EU/EEA, Brazil, Mexico

6) Company Name: GoCardless Ltd.

Company Registered Office: Sutton Yard, 65 Goswell Road, London, EC1V 7EN,

United Kingdom

Company Registered Number: 07495895

Categories of Data to be processed: Process membership payments individual enters

in their own details and Fitwise doesn't not have access to payment information

Territories where Data may be processed: EEA

7) Company Name: Henry Ling Limited

Company Registered Office: The Dorset Press, Dorchester, Dorset DT1 1HD

Company Registered Number: 224715

Categories of Data to be processed: Members name and address for the Journal

Territories where Data may be processed: United Kingdom

If we need to transfer your personal information to one of the abovementioned third parties then we will ensure that we have provided appropriate safeguards and an adequate level of security for your personal information in order to protect you rights and freedoms.

## HOW WE MAY USE YOUR PERSONAL INFORMATION

When you give us your personal information then we may use it to:

- 1. Manage, maintain, and monitor your membership with our association;
- 2. Carry out our obligations from any contracts entered into between you and us and to provide you with information that you request from us;
- 3. Provide you with information about our news, industry news, events from head office and your chosen branch; and
- 4. Ensure that content from our site is presented in the most effective manner for you and for your computer.

If you provide us with your e-mail then we may contact you by these electronic means (e-mail). We would use this information in order to keep you up to date about our events or to send you notifications about an event you may have registered or have expressed an interest in attending or provide you with general information about the goings-on within our association and wider industry. When you sign up and a member you chose a branch and the branch leads / area reps will email you directly about branch activities. We will

not use your personal information to provide you with emails on behalf of our industry partners without your express consent.

If you do not wish to receive any information by electronic means then please get in touch with our Data Privacy Officers (details below).

We do not engage in profiling and automated decision-making with respect to your personal information. For example we will not analyse or predict aspects concerning your economic situation, health, personal preferences, interests, reliability, behaviour, location or movements without your express consent.

## Marketing

If you are a member we believe that we have a legitimate interest to contact you via email or post for the duration of your membership and to send you reminders about outstanding fees or membership renewals. If you do not wish to receive any information then please get in touch with our Data Privacy Officers (details below).

If you are a non-member who attends one of our events and opts-in to receive information about us then, depending on what personal information we hold about you, we may decide to contact you via:

- E-mail; or
- Post.

With information on similar events which we feel you may be interested in attending. The purpose of opting into receiving communications from us is to help us better understand you, engage with you, share details about the association, and to assist us in providing the types of communications that you wish to receive from us

We will do our best to let you know what method or methods of communication we will use. Don't forget, you can always opt-out from receiving communications from us after you have opted-in.

We may need to pass your personal information to select third parties who are responsible for facilitating communication with you on our behalf.

The third parties that we use are as follows:

1) Company Name: Events Air (Part of Centium Software)

Company Registered Office: 21-23 Croydon Road, Caterham, Surrey, CR3 6PA

Company Registered Number: 08440654

Categories of Data to be processed: Event attendees enter in all their event registration

details

Territories where Data may be processed: European Economic Area

2) Company Name: Forfront (eshot)

Company Registered Office: 3rd Floor Paternoster House, 65 St Paul's

Churchyard, London, EC4M 8AB

Company Registered Number: 03643637

Categories of Data to be processed: name and email address to send emails to membership

Territories where Data may be processed: United Kingdom

If you receive communications but that organisation is not listed above then this might be because we are using that organisation or service on a one-off basis – in which case, we will let you know. If you are unsure then please get in touch with our Data Privacy Officers.

We will not knowingly sell your personal information for marketing purposes or pass your personal information to third parties without explicit consent, for example to the exhibitors after an event.

If you are receiving communications from us in error or you have opted-out then please get in touch with us and we apologise for any inconvenience caused.

## DISCLOSURE OF YOUR INFORMATION

We have appointed Fitwise Management Limited ("Fitwise") to provide the association with certain key management services. These management services are essential to the functioning of our association and we have a close working relationship with Fitwise. As a result, information that we may collect about you will be disclosed to Fitwise. The information processed and collected on our behalf by Fitwise will only be used for the purposes of managing our site, our association membership services, organising events, and communicating with you on our behalf. Fitwise will not use this information for marketing themselves and our association has a documented services agreement between us and Fitwise.

Subject to the disclosure of information to Fitwise, and the listed third parties we will not knowingly share your personal information with anyone outside of our association unless we are required under UK law or where we have anonymised your information so that you can no longer be identified.

Please remember that our Cookies Policy covers matters such as using your personal information for analytics purposes.

In some cases we may disclose information with select third parties:

- We may anonymise and aggregate your information with other users (for example, we may track that 500 men aged under 20 have clicked on a specific page on our site on any given day). We may use such aggregate and anonymised information to help reach a particular target audience or understand who uses our site.
- If we or substantially all of our assets are acquired by a third party, in which case personal information held by us about you may be one of the transferred assets.
- If we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to enforce any agreements with you, or to protect our rights, property, or safety of our employees, or others.

#### WHERE WE STORE YOUR PERSONAL INFORMATION

The personal information that we collect from you will be stored within the United Kingdom and the European Economic Area. We may also store or transfer certain limited types of personal information outside of the European Economic Area where it is necessary for the purposes of your membership with us or where you have received a communication from us and opted-in to providing us with further information. Where we transfer your personal information outside of the EEA then we will ensure that we have provided appropriate safeguards and an adequate level of security for your personal information in order to protect you rights and freedoms.

All personal information you provide to us is stored on our secure servers. Any online payment transactions will be encrypted using Secure Socket Layer/Transport Layer technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your data transmitted from our site and any transmission is at your own risk. Once we have received your personal information, we will use strict procedures and security features to try to prevent unauthorised access. We apply a 'Privacy by Design' approach to protecting your personal information in order to promote privacy and data protection compliance from the start. However, by its very nature our site can be accessed by individuals from around the world and it may be that our members may access or view some of your personal information from outside of the European Economic Area – for example, if you are listed in our private member's directory then that information may be viewable by other members even if they are not located in the European Economic Area.

### YOUR RIGHTS

You have the right to ask us not to process your personal information or to restrict the purposes for which we may process your personal information. However, if you have an account or membership with us and you withdraw your consent then we reserve the right to suspend or terminate your access to certain parts of our site or suspend or termination your membership with us.

You can exercise your right at any time by contacting our Data Privacy Officers. If you consented to us collecting and/or processing your personal information but you change your mind then you can get in touch with us about erasing the personal information we hold about you.

Please be aware that, even if we receive a request from you to delete your personal information, it may be that we cannot entirely remove all of your personal information. This is usually because we have a legitimate interest to hold onto some of that personal information, for example, if you have an ongoing contract with us, there are outstanding payments due by you to us, the personal information relates to a third-party such as a member of stuff, or we have a legal obligation to retain some or all of your personal information – but we'll let you know.

#### **ACCESS TO INFORMATION**

The legislation gives you the right to access a copy of the personal information that we hold about you.

In order to request a copy you need to submit a request to our Data Privacy Officers – details on how to get in touch can be found at the bottom of this page. However, please remember that certain types of data cannot be disclosed to you as part of your request. For example, we cannot disclose information to you which identifies another individual or information that may be subject to legal professional privilege. In many cases we may be required to redact some of the documentation that you receive in order to comply with the legislation.

Additionally, we can't just release your personal information to anyone. We can only release your personal information to you or an authorised third party who can demonstrate that you consented to have your personal information released – this is a legal requirement. Therefore, it is important for us to ensure that we confirm your identity before we can release any personal information.

If you send us a request to provide you with a copy of your personal information then we may ask you to provide some identification. We may ask you to provide a copy of your current and valid passport and/or driving license plus a utility bill (that is no more than 3 months old) and has your current address.

All of this might sound very onerous but please understand that we have an obligation to protect your personal information and we need to be certain that it is being released to the right person.

### WHAT IF I DO NOT CONSENT OR WITHDRAW CONSENT?

If you do not consent to us collecting your personal information then we cannot guarantee the full functionality of our site or your ability to maintain a membership with our association because we must collect certain types of personal information about you and we cannot be held responsible or liable to you for any reduction or restriction in access to our site or any of our other services.

Our site may, from time to time, contain links to and from the sites of our partners and affiliates. If you follow a link to any of these sites, please note that these sites have their own privacy and cookie policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal information to these sites.

## HOW LONG WILL YOU HOLD ONTO MY PERSONAL INFORMATION?

Depending on how you engage with us it may be necessary for us to store your personal information for shorter or longer periods of time. Either way, we will only store your personal information for a legitimate and lawful reason.

You can find details on how long we may hold onto your personal information on our Retention Policy which can be found on our website.

#### CHANGES TO OUR PRIVACY POLICY

We may need to change this Privacy Policy if it's necessary for legal reasons or to reflect changes to our site, association membership, or services. In any case, the provisions of this Privacy Policy may be changed without prejudice to your rights. When we change our Privacy Policy we will make the updated Privacy Policy available on our site and we will also update the "Last Updated" date.

Once we change our Privacy Policy, it will become legally binding on you 30 days after we post it on our site. During that period you're welcome to contact us if you have questions about the changes.

If you don't agree with our changes to the Privacy Policy (regardless of whether you get in touch with us) then unfortunately we may need to restrict or limit your use of the parts of our site or aspects of your membership with our association that require your personal information. We're sorry we have to say that, but we hope you'll appreciate that in order for certain parts of our site or membership services to work properly, be properly maintained, and in order for us to identify you in connection with our services we need to have everyone using our site and our membership services under the same rules instead of different people having different rules – that's why we encourage you to get in touch with us if you have queries.

### **CONTACT US**

This Privacy Policy was prepared with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of our collection and use of your personal information. However, we are happy to provide additional information or explanation needed.

If you have any questions, comments or requests regarding our Privacy Policy then please do not hesitate to get in touch with us. To make things easier for both of us we would appreciate it if your queries were addressed to:

Data Privacy Officers
Fitwise Management Limited
Blackburn House
Redhouse Road
Seafield, Bathgate
West Lothian
United Kingdom

or

privacyofficers@fitwise.co.uk

or

**Telephone:** +44 (0)1506 811077

## **COMPLAINTS**

If you are not satisfied with the way that we have handled any of your requests or queries relating to our use of your personal data then you can contact the Information Commissioner's

Office at <a href="https://www.ico.org.uk">www.ico.org.uk</a>. The Information Commissioner's Office is the statutory body responsible for overseeing data protection legislation and law in the United Kingdom.