

DATA PRIVACY NOTICE

Last updated 15 June 2018

Lifespan Integration UK Ltd is committed to the protection of the privacy of all who come into contact with us. Your personal data is really important to us and we understand how important it is to you. Our aim is to be as clear and open as possible about what we do with your personal data and why we do it.

Definitions

- **“Processing”** means anything that we do with your personal data – obtaining it, holding it, using it, or passing it on. The processing of personal data is governed by the General Data Protection Regulation (the “GDPR”).
- **“You”** means you as an individual. You are known as the **data subject** within the context of the GDPR and UK data protection law.
- **“We”** means the Lifespan Integration UK Ltd. The directors are the **data controller** as defined within the context of the General Data Protection Regulation (GDPR) and UK data protection law. This means we decide how your personal data is processed and for what purposes and are legally responsible for making sure your information is processed correctly and lawfully.
- **“Data processors”** are the organisation or individuals who handle your data, for example the course organiser, administrator, or other members of the Lifespan Integration UK team.
- **“Third party”** means anyone outside of Lifespan Integration UK Ltd, for example Lifespan Integration LLC in the USA, or another individual or organisation.

Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller’s possession or likely to come into such possession. Examples of the data we may process include:

- Names
- Contact details such as addresses, emails, telephone numbers
- Financial identifiers such as bank account details for refunds or if you pay for a training course
- Demographic information such as gender, date of birth, nationality
- Some of the data we process is likely to constitute sensitive personal data: access requirements or additional needs, training qualifications and therapy experience, past job history, personal biography, registered professional bodies, accidents logs

For freelance workers or members of the Management Team, we will process a greater amount of personal data. This will include the above examples and may also include:

- non-financial identifiers such as passport numbers, driving licence numbers, taxpayer identification numbers, tax reference codes, national insurance numbers
- Financial information such bank details for expenses claims
- Sensitive Personal data for equal opportunity monitoring such as racial or ethnic origin, gender, sexual orientation, religion, marital status, disability status

How do we process your personal data?

Lifespan Integration UK Ltd complies with its obligations under the “GDPR” by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We use your personal data for the following purposes:

- To process training applications;
- To process CPD applications;
- To administer subscription records;
- To provide a ‘find a therapist’ page on our website;
- To carry out comprehensive safeguarding procedures (including due diligence and complaints handling) in accordance with best safeguarding practice from time to time;
- To fundraise;
- To maintain our own accounts and records;
- To process a payment or donation that you have made;
- To keep registers of attendees at events;
- To undertake research;
- To inform you of news, events, training and activities run by Lifespan UK Ltd;
- To notify Lifespan Integration LLC (USA) of therapists who have completed training;
- To seek your views or comments.

For Freelance workers or members of the Management Team, we may also use your personal data:

- For legal, personal, administrative and management purposes and to enable us to meet our legal obligations, for example to pay Freelance workers or monitor performance;
- Process sensitive personal data such as information about physical or mental health or condition in order to take decisions as to the role holders fitness for work;
- To coordinate volunteer team lists.

Our website and cookies

Pieces of information transferred to your computer’s hard disk from a website are known as cookies. They allow websites to store information about your browsing patterns, making the website more useful to you. Many major sites use cookies: in fact, they are commonly used throughout the internet to offer personalised services. Most browsers are automatically set to accept cookies. Each time you use a website, the cookie is accessed. You may disable cookie support on your browser if you wish.

Our website is a Wordpress site which is run by Automattic Inc. We use a standard WordPress service to collect anonymous information about users' activity on the site, for example the number of users viewing pages on the site, to monitor and report on the effectiveness of the site and help us improve it. But this does not provide us with any personal information - we do not know who is visiting us from these statistics. For more information about how WordPress processes data, please go to <https://automattic.com/privacy/>

What is our lawful basis for using your information?

The lawful basis for using your information falls under 6 main categories. Under each category we have outlined some examples.

1. Processing is necessary for the performance of a contract

For freelance workers and members of the Management Team, we do require information to be supplied. If you don't want to supply these details we would not be able to employ you or accept you as a volunteer. Similarly, if you wish to apply for a training course, we would require certain personal information from you. Without this information we would not be able to accept you onto the course.

2. Processing is necessary for compliance with a legal obligation

For example we are required to keep financial records for HMRC.

3. Processing is necessary to protect the vital interests of you or another person

If you are physically or legally incapable of giving consent, but we need to protect your vital interests, in an emergency, we may use your personal information. For example, if you had been taken seriously unwell whilst attending a training event, we may pass on next of kin details or medical information to emergency services.

4. In the exercise of official authority or in the public interest

For example, if we felt there was a safeguarding issue, we would be required by law to inform the appropriate authorities/bodies.

5. Processing on the basis of legitimate interest

For example, where you have registered for a workshop or course we will use your information to communicate with you about that training, both before the event, and in follow up after the event. We may also use your information to contact you about other workshops or courses which follow on from the one you undertook.

6. Processing on the basis of Consent

For most communications we will only process your information if you have given us explicit consent. For example,

- Where you have chosen to give us your contact details so that we can keep in touch with you about Lifespan Integration news, training and information.
- Where you have voluntarily subscribed to the news email list and explicitly consented to receiving our emails. You can unsubscribe from this list at any time using the unsubscribe link in the footer of those periodic emails. Our news emails are sent using Mailchimp. You can read their Privacy Policy here: <https://mailchimp.com/legal/privacy/>
- Where you have explicitly consented for us to publish your details on the Lifespan Integration website.

Special Category data (sensitive personal data such as therapy experience, past job history, personal biography, registered professional bodies or ethnic origin) needs more protection. We will only process such data if it meets one of the above categories **and** one of the conditions below:

1. the data subject has given explicit consent to the processing of their personal data for one or more specified purposes
2. processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent
3. processing relates to personal data which is manifestly made public by the data subject (for example when processing personal data on therapists who already publish this information on their own website or a public body listing)

Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

How secure is your information?

We take security very seriously and will do everything within our power to keep your information safe. Any printed documents are stored securely, where possible in a locked cupboard, and any electronic files are kept encrypted.

Sharing your personal data

Your personal data will be treated as strictly confidential and will only be shared within the Lifespan Integration UK Team for the purposes outlined in this notice.

If you apply for a Level 1, 2 or 3 Lifespan Integration training course, we will need to share your details with the Trainer in order for her to approve your application. We are also required to provide Lifespan Integration LLC in the USA with information about delegates who have completed our Lifespan Integration training courses.

We will only share your data with other third parties with your prior consent, or unless required to do so by law.

Transfer of Data Abroad

The GDPR imposes restrictions on the transfer of personal data outside the European Union, to third countries or international organisations. These restrictions are in place to ensure that the level of protection of individuals afforded by the GDPR is not undermined. Transfers may be made where the Commission has decided that a country ensures an adequate level of protection. Our current trainer for our Lifespan Integration courses is based in Switzerland, which is listed as one of the countries providing adequate protection. When we send application forms or other delegate information to our trainer, we will ensure it is sent securely and that the trainer follows the requirements and responsibilities set out in this Privacy Notice.

The GDPR provides derogations from the general prohibition on transfers of personal data outside the EU for certain specific situations. Transfer may be made where the transfer is:

- necessary for the performance of a contract between the individual and the organisation;
- necessary for the performance of a contract made in the interests of the individual between the controller and another person;
- made with the individual's informed consent

We are required in our contract with Lifespan Integration LLC in the USA to send a list of delegates completing Lifespan Integration with their names and country of origin. We will however seek your informed consent before we send any further contact information.

Our website is accessible from overseas so some personal data (eg a listing on the 'find a therapist' page) may be accessed from overseas.

How long do we keep your personal data?

We endeavour to maintain only data that is relevant, accurate and up to date. We have internal processes to periodically review the data we hold and delete data that is no longer relevant to our purpose for processing. We may keep some other records for an extended period of time and others permanently if we are required to do so, for example safeguarding records.

Your rights and your personal data

You have the following rights with respect to your personal data:

1. The right to access information we hold on you

- At any point you can contact us to request the information we hold on you as well as why we have that information, who has access to the information and where we obtained the information from. Once we have received your request we will respond within one month.
- There are no fees or charges for the first request but additional requests for the same data may be subject to an administrative fee,

2. The right to correct and update the information we hold on you

- If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated.

3. The right to have your information erased

- If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase the data we hold.
- When we receive your request we will confirm whether the data has been deleted or the reason why it cannot be deleted (for example because we need it for our legitimate interests or regulatory purpose(s)).

4. The right to object to processing of your data

- You have the right to request that we stop processing your data. Upon receiving the request we will contact you and let you know if we are able to comply or if we have legitimate grounds to continue to process your data. Even after you exercise your right to object, we may continue to hold your data to comply with your other rights or to bring or defend legal claims.

5. The right to data portability

- You have the right to request that we transfer some of your data to another controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.

6. The right to withdraw your consent to the processing at any time for any processing of data to which consent was sought.

- You can withdraw your consent easily by telephone, email, or by post (see Contact Details).

7. The right to object to the processing of personal data where applicable.

- Where we use your personal information to perform tasks carried out in the public interest then, if you ask us to, we will stop using that personal information unless there are overriding legitimate grounds to continue.

8. The right to lodge a complaint with the Information Commissioner's Office.

- If you feel we have used your information incorrectly or without lawful basis, or you dispute our lawful basis, you have the right to lodge a complaint with the Information Commissioner's Office (ICO).

Please contact us if you wish to exercise any of these rights.

Contact Details

We can provide you with access to your personal data at any time. We ask that requests are emailed to info@lifespanintegration.org.uk or by post: The Data Compliance Officer, Lifespan Integration UK Ltd, Unit 3, Newhouse Business Centre, Old Crawley Road, Horsham, RH12 4RU.

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

Changes to this notice

We keep this Privacy Notice under regular review and we will place any updates on the Lifespan Integration web page www.lifespanintegration.co.uk.

Version 1 was published 18 May 2018

Version 2 was published 29 May 2018

Version 3 (current version) was published 15 June 2018