

### **1. Why do we use your data?**

Here at the Care Professional Academy we take your privacy seriously and will only use your information to help us manage your affiliation account with us, to share health and social care information with you from the Care Professional Academy and our partners, to ensure you know about training development opportunities and to successfully deliver our services to you.

### **2. What type of data is stored?**

The type of data that we collect from you could include; your name, organisation, contact details for your place of work, job title, personal details (such as date of birth, address, contact details), your previous The Care Professional Academy activity (such as events attended, courses booked or attended, affiliation status, etc.), any feedback you share with us and any personal requirements you request when attending events or training courses booked through the Care Professional Academy. We may also collect some special categories of personal data including details about your race or ethnicity and information about your health. We will ask for your explicit consent before collecting this data.

Where we need to collect personal data by law, or under the terms of a contract we have with you or your employer, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you or your employer (for example, to provide you with training). In this case, we may have to cancel our provision of training or education to you, but we will notify you if this is the case at the time.

### **3. How is your personal data collected and used?**

Your data is collected either by a direct interaction with us (for example, when you call us or fill out a form, we provide you with when applying to use our services) or by being transferred to us from your employer who has nominated you to use our services.

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you or your employer;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; or
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before obtaining any special categories of personal data (e.g. details of racial or

ethnic origin or health information). You have the right to withdraw consent to marketing at any time by contacting us.

We will only use your personal data to register you as a user of our services or provide our services to you or to manage our relationship with you.

#### **4. Who do we share data with?**

We respond to information requests from our health and social care partners, approved training providers and funders about our members and other care providers only when in relation to quality assurance, safeguarding purposes and in order to successfully deliver training courses through our network of approved training providers.

In order to provide you certain benefits and perks, we will have to share some personal information with our partners, for example in order to activate Gateway Rewards for you, we must share your date of birth and email address as part of their activation process. This will be the case with other benefits which may arise.

We will not share or sell your data to commercial business third parties, such as our network of trusted strategic partners that offer business support services to our members, beyond the above specification and we promise to keep your details safe and secure at all times.

#### **5. How long will we use your personal data for?**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data: see below for further information.

## 6. Under what legal basis do we collect / use / share your personal data?

- a) Consent: We collect, hold, and process your personal data on the basis that you have provided consent. You remain in control of the personal data you share with the Care Professional Academy and can change your preferences at any time, by choosing whether you want to give consent to your data being processed for specific purposes. You can cancel your consent at any time and your details and information will be deleted, by sending an email to [info@CareProfessional.co.uk](mailto:info@CareProfessional.co.uk)
- b) Legitimate Interest: We may collect, hold, and process your personal data on the basis of legitimate interest where it is necessary in order for us to fulfil our needs as a business and to be able to provide you with our services. In particular, when we are providing training or other educational services it is necessary for us to process personal data from you and we have a legitimate interest to do so in our role as an Academy for Care Professionals.
- c) Vital Interest: We may use your personal information if we reasonably believe that there is any safety or health issue. This type of processing is in your vital interest.
- d) Legal Obligation: We may use and process your personal data to comply with our legal obligations such as HMRC requirements, or if the Police or a local authority requests it.
- e) Contract Law: We may process your personal data where it is necessary for the performance of a contract to which the data subject is party, or at the request of the data subject prior to entering the contract.
- f) Medical: We may process your personal data where it is necessary for the purposes of preventative or occupational medicine and for other medical purposes, or for your protection when attending events / courses.

We do not transfer your personal data outside the European Economic Area (**EEA**).

## 7. The following rights may apply to your personal data.

### The right to be informed.

As a data controller, we are obliged to provide clear and transparent information about our data processing activities. This is provided by this privacy policy and any related communications we may send you.

### The right of access.

You may request a copy of the personal data we hold about you free of charge. Once we have verified your identity and, if relevant, the authority of any third-party request, we will provide access to the personal data we hold about you as well as the following information:

- a. The purposes of the processing.
- b. The categories of personal data concerned.
- c. The recipients to whom the personal data has been disclosed.
- d. The retention period or envisioned retention period for that personal data.
- e. When personal data has been collected from a third party, the source of the personal data.

If there are exceptional circumstances that mean we can refuse to provide the information, we

will explain them. If requests are frivolous or vexatious, we reserve the right to refuse them. If answering requests is likely to require additional time or unreasonable expense (which you may have to meet), we will inform you.

#### **The right to rectification.**

When you believe we hold inaccurate or incomplete personal information about you, you may exercise your right to correct or complete this data. This may be used with the right to restrict processing to make sure that incorrect / incomplete information is not processed until it is corrected.

#### **The right to erasure (the 'right to be forgotten')**

Where no overriding legal basis or legitimate reason continues to exist for processing personal data, you may request that we delete your personal data. This includes personal data that may have been unlawfully processed. We will take all reasonable steps to ensure your data is erased.

#### **The right to restrict processing.**

You may ask us to stop processing your personal data. We will still hold the data but will not process it any further. This right is an alternative to the right to erasure. If one of the following conditions applies you may exercise the right to restrict processing:

- a) The accuracy of the personal data is contested.
- b) Processing of the personal data is unlawful.
- c) We no longer need the personal data for processing, but the personal data is required for part of a legal process.
- d) The right to object has been exercised and processing is restricted pending a decision on the status of the processing.

#### **The right to data portability.**

You may request your set of personal data be transferred to another controller or processor, provided in a commonly used and machine-readable format. This right is only available if the original processing was on the basis of consent, the processing is by automated means, and if the processing is based on the fulfilment of a contractual obligation.

#### **The right to object.**

You have the right to object to our processing of your data where:

- Processing is based on legitimate interest.
- Processing is for the purpose of direct marketing.
- Processing is for the purposes of scientific or historical research.
- Processing involves automated decision-making and profiling.

## **8. How can you alter or delete your data with us?**

If at any point you would like to update your details and contact preferences simply email [info@CareProfessional.co.uk](mailto:info@CareProfessional.co.uk) and we will, within reason, try to comply to your requests. Do please let us know particularly if you have a change of contact person details, so we can ensure information reaches the right people at your organisation. Please allow 72 hours for the changes to take effect.

If you would like to stop receiving emails from us entirely you can simply click the unsubscribe link that can be found at the bottom of our emails or you can email [info@CareProfessional.co.uk](mailto:info@CareProfessional.co.uk) to ask to be removed from our distribution list. Please allow 72 hours for the changes to take effect. Please note: If you choose to unsubscribe from the Care Professional Academy's email database, you will miss out on important alerts from our health and social care partners, fully funded training courses and events, relevant updates from the wider Hertfordshire health and social care network and details of services included within your affiliation with us.

## **9. Need to talk to us?**

If you have any questions about the Care Professional Academy's Privacy Policy, please email [info@CareProfessional.co.uk](mailto:info@CareProfessional.co.uk) to or call us on 01707 536020. Alternatively, you can write to us at :-

The Care Professional Academy,  
Mundells Campus,  
Mundells,  
Welwyn Garden City,  
AL7 1FT.

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.