



## YOUR PERSONAL INFORMATION GENERAL DATA PROTECTION REGULATION (GDPR)

GDPR (implemented by DPA2018 in the UK) brought in new legal protection for personal information from 25<sup>th</sup> May 2018. This tells you what personal information we hold and why, and what your rights are.

**Organisation name:** Association of Reflexologists

**Address:** Victoria House, Victoria Street, Taunton, TA1 3FA

**Telephone No:** 01823 351010

Please direct any enquiries relating to GDPR to [DataController@aor.org.uk](mailto:DataController@aor.org.uk)

### **Purpose of processing the Information we hold:**

The purpose of holding and using the information we retain is to provide you with the best possible membership related support and related services support.

### **Lawful Basis for holding and using Member and non-Member Information:**

The lawful basis under which we hold and use your information is **"our legitimate interests"** i.e. Our requirement to retain the information you provide to us in order to provide you with the best possible membership related support and related services support.

### **What information we hold and what we do with it:**

In order to provide our wide range of membership services and support, we need to ask for and keep information about you. We will not use this information for any other purpose (except as required for legal purposes) without your prior consent. The information to be held is:

- Your contact details
- Your qualifications and past Reflexology related work history
- Your CPD information (including copies of CPD certificates)
- Record of any contact with you
- Record of any sales. *Please note that we use a third party provider to deliver our quarterly journal, Reflexions, they are only permitted to use your name and address to send the journal out to you.*

We may retain this information (other than sales records) in respect of non-members, in case of:

- An unsuccessful applicant who may wish to reapply at a later date
- A lapsed member who may wish to re-join at a later date
- A complaint lodged against a member

### **How long we keep your information for:**

The criteria used for determining the retention period is as follows:

1. For current members: we keep all information while membership is current in line with our legitimate interest above
2. For non-members and lapsed former members: we keep all information to enable us to:
  - a. issue a speedy response in case you wish to re-apply for membership at a later date
  - b. be able to confirm any details of past membership which you may ask us about
3. For a complaint: we need to retain complaint related information to be able to investigate the complaint, and to respond to any related queries. Thereafter, in

line with the NHS England Complaints Policy (2020), we keep the information for a 10 year period from the date of closure of the complaint, or if there is a series of linked complaints, then retention is for 10 years after the closure of the last complaint.

### **Data Security:**

We are committed to ensuring that your personal data is secure. In order to prevent unauthorised access or disclosure, we have put in place appropriate technical, physical and managerial procedures to safeguard and secure the information we collect from you. We will contact you using the contact preferences you have given us.

### **Your rights:**

GDPR gives you the following rights:

- The right to be informed:  
*To know how your information will be held and used (this notice).*
- The right of access:  
*To see our records of your personal information, so you know what is held about you and can verify it.*
- The right to rectification:  
*To tell us to make changes to your personal information if it is incorrect or incomplete.*
- The right to erasure (also called "the right to be forgotten"):  
*For you to request us to erase any information we hold about you if you ask us not to hold it anymore*
- The right to restrict processing of personal data:  
*You have the right to request limits on how we use your personal information*
- The right to data portability: *under certain circumstances you can request a copy of personal information held electronically so you can reuse it in other systems.*
- The right to object:  
*To be able to tell us you don't want them to use certain parts of your information, or only to use it for certain purposes.*
- Rights in relation to automated decision-making and profiling.
- The right to lodge a complaint with the Information Commissioner's Office:  
*To be able to complain to the ICO if you feel your details are not correct, if they are not being used in a way that you have given permission for, or if they are being stored when they don't have to be.*

Full details of your rights can be found at <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

### **The Association of Reflexologists rights:**

Please note:

- If you don't agree to us keeping records of information about you and your membership, then we will not be able to accept you as a member, or to renew your membership, and we will not be able to answer any queries you may have at a later date.
- We have to keep your records for a certain period as described above, which may mean that even if you ask us to erase any details about you, we might have to keep these details until after that period has passed
- We can move records between our computers and IT systems, as long as your details are protected from being seen by others without your permission.