

# MCA PRIVACY STATEMENT

# **Privacy Policy**

As a membership- based association dedicated to serving the chiropractic profession, we understand the importance of maintaining your privacy, keeping your personal information secure and complying with data protection laws. This policy sets out how we will treat your personal information.

Our lawful basis for processing your personal data is to meet contractual obligations, legal obligations, and for legitimate interests.

For clarity, the MCA may be both data controller and data processor for your personal data under certain circumstances.

This privacy policy describes what personal information the McTimoney Chiropractic Association (MCA) may collect from you, why we use your personal information and more generally the practices we maintain and ways in which we use your personal information.

This policy is subject to change, so please check our website on a regular basis for any updates.

## Please read the following carefully.

The type of information we collect and hold about you will depend on whether you are a member of the MCA, a registered user of our website, simply browsing our resources or contacting us for other purposes.

By providing your personal information to us, you acknowledge that we may use it in the ways set out in this privacy policy. We may provide you with further notices highlighting certain uses we wish to make of your personal information. We may also give you the ability to opt-in or opt-out of selected uses such as marketing when we collect your personal information.

If you are registering other people for one of our events or where you have been nominated as a key contact at a clinic managed by one of our members, you must ensure this privacy policy has been drawn to the attention of those individuals and that you have permission to share their information with us.

From time to time we may need to make changes to this privacy policy, for example, as the result of government regulation, new technologies, or other developments in data protection laws or privacy generally. You should check the <u>MCA</u> website periodically to view the most up to date privacy policy.

#### What information do we collect?

We may collect, store and use the following kinds of personal information:

- information relating to any transactions carried out between you and us on or in relation to your membership with the MCA and the use of our website, including information relating to any purchases you make of our goods or services such as event tickets or membership;
- information that you provide to us for the purpose of joining the MCA;
- information that you provide to us for the purpose of subscribing to our website services, email notifications and/or newsletters.

# If you:

- register with our website;
- use any of our social tools;
- apply for MCA membership;
- register for MCA events or services, including subscribing to updates or bulletins, or
- contact the MCA for any other purpose (including via social media);

you will be asked to submit personal information. This may include your name, surname, date of birth, correspondence and clinic address, post code, telephone number, your MCA membership, GCC registration number, email address, and payment details including bank account details, bank sort code and account number.

If you are a member of the MCA, we collect additional information about you in your membership application. We will also collect information during the course of your membership about the services you use, your preferences, responses to surveys, attendance at events and other contact you have with us (including use of any of our services).

Our website uses cookies. By using our website and agreeing to this policy, you consent to our use of cookies.

Finally, we may monitor and record communications with you (such as voicemail messages and emails) for the purpose of quality assurance, training, fraud prevention and compliance.

## Using your personal information

Personal information submitted to us will be used for the purposes specified in this privacy policy or in relevant parts of the website.

We may use your personal information to:

- carry out our obligations arising from any contracts entered into by you and us;
- administer the website;
- enable your use of the services available on the website;
- send you goods purchased via the website, and supply to you services purchased via the website:
- send statements and invoices to you, and collect payments from you;
- send you email notifications which you have specifically requested;
- send you our MCA bulletin which is used to keep you informed about the MCA, the Membership and the Profession from which you can unsubscribe at any time;
- provide third parties with statistical information about our users but this information will not be used to identify any individual user;
- keep the website secure and prevent fraud;
- send you relevant communications associated with being a member of the MCA;
- seek your views or comments on the services we provide;
- notify you of any changes to our services.

## Sensitive personal information

Sensitive personal information is information which relates to issues including your health, sexual orientation, race or religion. We may obtain sensitive personal information about you only if you volunteer it during any of your contact with us.

If you are a member of the MCA, the fact of your membership is itself sensitive personal information as trade union membership is included in the definition in the GDPR legislation. We will not share details of your membership of the MCA with third parties to use for their own purposes without your consent.

We have additional obligations to treat sensitive personal information with appropriate care, taking into account the nature of that information. The best way to restrict the processing of your sensitive personal data is not to give it to us unless it is necessary for the services you are obtaining from us (for example, providing health details when applying to the Benevolent Fund).

However, if you do volunteer such information, you consent to us processing your sensitive personal information for the purposes for which you have provided the information, or as

either explicitly or impliedly communicated to you at the time you provided the information. In particular you consent to us using our service providers in the normal course of business to process that sensitive personal data under an appropriate contract with us.

You also consent to us confirming the existence of your membership to approved providers who you wish to obtain services from (for example our bloc scheme professional indemnity provider) where either the services are only available to MCA members or a benefit is provided by those providers to MCA members.

If you do not consent to this use of your sensitive personal information, you must let us know when you provide us with this information, or <u>contact us</u>. Please note that, if you do not wish to consent to such use, you may be restricted in the services you are able to obtain from the MCA.

## Who may access personal information?

We will not sell your information to third parties.

We may disclose your personal information to our agents and service providers; this means anyone who is providing a service to the MCA (for example Balens). They will be subject to obligations of confidentiality. They may contact you on our behalf.

In addition, we may disclose your personal information:

- to the extent that we are required to do so by law;
- in connection with any ongoing or prospective legal proceedings;
- in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

From time to time we may also need to disclose information to credit reference agents and law enforcement agencies in connection with any investigation.

**Retention of your personal information** - We are legally required to hold some types of information to fulfil our statutory obligations, for example accounting records for 6 years for HMRC. We aim to remove all other personal information within 28 days of you ceasing to be a member of the MCA.

## Transfers of data out of the EEA

In certain circumstances, we may transfer your personal data to countries outside the European Economic Area. This may include circumstances where we use service providers who are based outside the EEA or who use "cloud" infrastructure, which means that their servers are based all

over the world. We understand our obligation to protect your personal data and consider carefully the appropriateness of these services with reference to the assurances provided by those service providers, and the legal commitments we are able to impose on them.

## Marketing

As set out above, we may use your personal information to contact you about other services or opportunities available from the MCA or selected third parties.

If you do not wish to receive such information, you may indicate this on your application form or at any time by contacting us at the MCA office.

## Managing your personal information

You may be entitled to obtain access to personal information that we process about you. If you wish to do so, you should put your request in writing;

- include proof of your identity and address (e.g. a copy of your driving licence or passport, and a recent utility or credit card bill);
- specify the personal data you want access to, including any account or reference numbers where applicable.

If you would like to correct any inaccuracies in your data, this can be done free of charge. To do this, you should:

- email us at admin@mctimoney-chiropractic.org;
- provide us with enough information to identify you (e.g. membership number, address);
  and
- specify the information that is incorrect and what it should be replaced with.

If you wish to update or change any of the membership details that we hold about you yourself, you may do so by logging into your member area of the website, or by telephone (01491 739120).

#### Security

On our website there are certain areas where you can transmit bank, credit card or debit card details in order to purchase a product or service. Such details are transmitted in an encrypted manner via a Secure Socket Layer (SSL). Similar details collected through other sources (for example by telephone or surface mail) are stored in accordance with relevant legislation. No financial details are passed to third parties without your explicit permission or unless we are required to do so by law.

Despite our best efforts, unfortunately no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot warrant the security of any information you transmit to us from our online products or services, and you do so at your own risk. Once we receive your transmission, we make our best efforts to ensure its security on our systems.

# Changes to our privacy policy

If we change our privacy policy, we will post the changes on this page and may place notices on other pages of the website, so that you may be aware of the information we collect and how we use it at all times.

#### Links to other websites

Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

# **Updating information**

As a member of the MCA you can update the information we hold about you yourself, simply login to the member area of the website and change as necessary. Otherwise, please let us know if the personal information which we hold about you needs to be corrected or updated.

#### Contact

If you have any questions about this privacy policy or our treatment of your personal information, please contact\_admin@mctimoney-chiropractic.org