## Document Control Information

### Document Details

<table>
<thead>
<tr>
<th>Document Name</th>
<th>CPHC Data Privacy Notice</th>
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</thead>
<tbody>
<tr>
<td>Purpose of Document</td>
<td>To ensure individuals understand their rights with regards to interacting with CPHC</td>
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<td>Document Version Number</td>
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<td>CPHC Officers</td>
</tr>
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### Version History

<table>
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<tr>
<th>Version Number</th>
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<tr>
<td>V1.0</td>
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<td>Document created</td>
<td>M Leslie</td>
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<td>E Smith</td>
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<td>(NB: ignores draft version numbers)</td>
<td>R Levermore</td>
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### Distribution List

<table>
<thead>
<tr>
<th>Name</th>
<th>Title/URL</th>
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<tr>
<td>CPHC Committee</td>
<td></td>
</tr>
<tr>
<td>CPHC website</td>
<td><a href="https://cphc.ac.uk/legal/">https://cphc.ac.uk/legal/</a></td>
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1. Introduction

CPHC is committed to ensuring data security and the fair and transparent processing of your data. This privacy notice sets out how we will treat the personal data which you provide to us in compliance with the Data Protection Act 2018 and the General Data Protection Regulations (EU) 2016/679 (GDPR).

This privacy notice contains important information on how and why we collect, store, use and share personal data, your rights in relation to your personal data and how to contact us if you have any concerns about how we process your data.

JISCMail service policies may be viewed here: https://www.jiscmail.ac.uk/policyandsecurity/

2. What personal data do we collect?

Personal data, or personal information, means any information about you which could be used to identify you. The following information relates to CPHC members and CPHC Committee members.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier, title and date of birth;
- **Contact Data** includes postal address, email address and telephone numbers;
- **Financial Data** includes bank account details;
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website;
- **Profile Data** includes your interests, preferences, feedback and survey responses;
- **Usage Data** includes information about how you use our website and services.

3. How we collect your personal data

We use different methods to collect data from and about you through:

**Direct interactions.** You may give us your identity, contact and financial data by filling in forms or by corresponding with us by post, phone, email or in person. This includes personal data you provide when you:

- provide annual returns for the data collection exercise conducted in advance of membership invoicing;
- apply for our services;
- correspond with CPHC;
- apply for membership;
• register for an event;
• access resources, including videos and podcast recordings;
• participate in surveys; or
• give us some feedback.

Information may be submitted to us on your behalf by your Head of Department. Heads of Department must seek your consent for sharing your personal information prior to submission.

Automated technologies or interactions. As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns including the IP address used; login information; browser type and version, operating systems and platforms. We may also collect information about your visit including the pages you visited; what you searched for; length of visits and methods used to browse away from the page. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive technical data about you if you visit other websites employing our cookies.

4. How we use your personal data

When we ask you to supply us with personal data, we will make it clear whether the personal data we are asking for must be supplied so that we can provide services to you, or whether the supply of any personal data we ask for is optional.

We may use your personal data to fulfil a contract or take steps linked to a contract:
• to provide the services to you;
• to communicate with you in relation to the provision of the contracted services;
• to provide you with administrative support such as account creation, security and responding to issues;
• to collect information for calculating subscription fees and subsequent invoicing;
• to assemble working groups for specific purposes;
• to provide you with surveys and information about our events.

4.1 Legitimate Interests

Where the collection of data is necessary for purposes which are in our legitimate interests. These interests are:

• communicating with you in relation to any queries, issues, complaints, financial transactions;
• improving the quality of experience when you interact with our services including testing the performance and customer experience of our website.
4.2 Where required by law

We may also process your personal data if required by law, including responding to requests by government or law enforcement agencies or for the prevention or crime or fraud.

4.3 Purposes for which we will use your personal data

Below is a description of the ways we may use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

<table>
<thead>
<tr>
<th>Purpose / Activity</th>
<th>Type of data</th>
<th>Lawful basis for processing including basis of legitimate interest</th>
</tr>
</thead>
<tbody>
<tr>
<td>To process and deliver services to you including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us (c) Mailing information</td>
<td>(a) Identity (b) Contact (c) Financial (d) Transaction (e) Communications</td>
<td>(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) (c) consent</td>
</tr>
<tr>
<td>To manage our relationship including: (a) Notification about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey. We may cross-reference your survey responses with information that we already hold about you. This would be for research purposes only, unless you expressly request otherwise.</td>
<td>(a) Identity (b) Contact (c) Profile (d) Communications</td>
<td>(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how members use our services)</td>
</tr>
<tr>
<td>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</td>
<td>(a) Identity (b) Contact (c) Technical</td>
<td>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation</td>
</tr>
</tbody>
</table>
4.4 Event Booking

CPHC uses Eventbrite for the majority of its events bookings and participants will register directly with them. Please refer to their Privacy Policy for details of how they will process your data. If you require updates, amendments or deletion you should contact Eventbrite directly as they are the data controller.

4.5 Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, some parts of the CPHC website may become inaccessible or not function properly. You can also turn off advertising by visiting http://www.youronlinechoices.com/uk/ and adjusting your privacy settings in your browser.

4.6 Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Who we share your personal data with

We may share your personal data with other CPHC members when you provide CPHC with your information. This may include email addresses when setting up working groups or biographical information during Committee elections.

We take reasonable steps to ensure that CPHC members protect your personal data and are aware of their information security obligations. We limit access to your personal data to those who have a business need to know it.
5.1 Third Parties

We may also share your personal data with trusted third parties including:
- Service providers contracted to us in connection with the provision of services;
- CPHC Chair;
- External and internal lawyers and/or specialist advisors
- CPHC may also be bound to share data with the police or other law enforcement agencies in the event of a crime.

We will ensure there is a contract in place with the categories of recipients listed above which include obligations in relation to the confidentiality, security and lawful processing of any personal data shared with them. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

5.2 Extraordinary Circumstances

Occasionally and only where necessary to fulfil our legal obligations, conduct investigations and/or deliver our services, we may share your information with law enforcement organisations such as the police or courts.

5.3 Recordings

We may record events such as workshops and seminars but will ask for the consent of participants before doing so. We do this in the interests of sharing session input with CPHC members.

6. How long will we keep your personal data?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 requirements.

6.1 Financial Data

CPHC will not delete any data which relates to financial transactions that is less than seven years old as we are legally required to hold this information for seven years.
7. Where we store your personal data and how is it protected

We take reasonable steps to protect your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know.

They will only process your personal data on our instructions, and they are subject to a duty of confidentiality. We also have procedures in place to deal with any suspected data security breach. We will notify you and the relevant Regulator(s) such as the ICO of a suspected data security breach where we are legally required to do so.

Where you have a username and password (or other identification information) which enables you to access certain services or the JISCMail portal, it is your responsibility to keep this information secure. Please do not share your password with anyone.

8. Your Rights

You have legal rights under the data protection laws in relation to your personal data. Read below to learn more about each right you have.

We may ask you for proof of identity when making a request to exercise any of these rights. We do this to ensure we only disclose information when we know we are dealing with the right person.

We will not charge you for any of these requests unless we think your request is unfounded, repetitive or excessive. Where a fee is necessary, we will inform you before we proceed with your request.

We will respond to all valid requests within one month. It may however take us longer if the request is particularly complicated or you have made several requests. We will always let you know if we think a response will take longer than one month. To speed up our response, we may ask you provide more detail about what you want to receive or are concerned about.

We may not always be able to do what you have asked, for example, if it would impact the duty of confidentiality we owe to others, or if we are otherwise legally entitled to deal with the request in a different way.

8.1 The right to be informed

You can ask us what data we hold on you and what we do with it.

8.2 The Right of Access / Data Subject Access Request (DSAR)

You can ask us to provide you with a copy of your personal data that we hold about you by contacting the Secretariat at cphc@bcs.uk. Please note that CPHC will not
provide copies of any emails sent to or received from yourself as you already have received this information. We also will not provide any internal emails or documents that may contain your name unless the information contained in the email is:

- significantly biographical with regards to you as the data subject and/or
- you as the data subject were the focus of attention in the document.

We may be unable to make all information available to you if, for example, making the information available to you would reveal personal data about another person or if your request is manifestly unfounded or excessive.

8.3 Correcting Personal Information / Right of Rectification

You can ask us to correct any information about you which is incorrect. We will be happy to correct such information but may need to verify the accuracy of it first. CPHC members can change their own personal information held within JISCMail at any time by logging in to the www.jiscmail.ac.uk website.

8.4 Right to Erasure / Right to Be Forgotten

You can ask us to:

- erase your personal information if you think we no longer need to use of for the purpose we collected it from you;
- erase your personal information if you have either withheld your consent to use using your information (if we originally asked for your consent to use your information), or exercised your right to object to further legitimate use of your information, where we have used it unlawfully or where we are subject to a legal obligation to erase your personal information

We may not always be able to comply with your request, for example, if we need to keep using your personal information in order to comply with our legal obligations or where we need to use it to establish, exercise or defend legal claims.

8.5 Right to Restrict Processing / Withdrawing Consent

Where we have asked for your consent to use your personal information, you will always have the right to withdraw your consent. We will still hold your details on our databases but will not contact you.

8.6 The Right to Object

Requesting a transfer of personal information / Data Portability

You can ask us to:

- provide your personal information to you in a structured, commonly used, and machine-readable format,
- or you can ask to have it transferred directly to another data controller (i.e. another organisation).
You can only do this where we use your personal information in order to perform a contract with you, or where we asked for your consent to use your personal information. This right does not apply to any personal information which we hold, or process based on our legitimate interest or which is not held in digital form.

9. Third Party Requests

We accept third party requests from individuals such as friends, relatives, solicitors or from persons who have power of attorney where:

a. we have a letter from the data subject stating that they want a named person to make these changes on their behalf;

b. we are given evidence of power of attorney;

c. the data subject and third party call together (either by being in the same room at the same time) or by a three-way call with CPHC.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you 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 (for example, to provide you with services). In this case, we may have to cancel a service you have with us, but we will notify you if this is the case at the time.

10. Contact Us

If you would like to contact us about the use of your personal data, or exercising your personal rights then please contact us at cphc@bcs.uk.

11. Your Right to Complain

If you believe that your data protection rights have been breached and we have been unable to resolve your concern, you have the right to report your concern to your local data protection supervisory authority. In the UK this is the Information Commissioner’s Office (ICO) and you can raise your concerns by going to https://ico.org.uk/concerns.

We do ask that you please attempt to resolve any issue with us before contacting the ICO.

12. Review and Monitoring

We will review this privacy notice on an annual basis in line with departmental quality standards and regulatory criteria.