



Faculty of Homeopathy Privacy Policy

The Faculty of Homeopathy holds personal data of its members to provide its services. This data security statement summarises the personal data the Faculty may retain, process and share. We are committed to ensuring that your information is secure, accurate and relevant. To prevent unauthorised access or disclosure we have implemented suitable physical, electronic and managerial procedures to safeguard and secure the personal data we hold.

The Faculty respects the privacy rights of individuals and are committed to handling personal information responsibly and in accordance with applicable law. This document sets out the personal information that we may collect and process, the purposes of the processing and the rights connected with it.

The types of personal information the Faculty may process include:

- Identification data – such as name, gender, photograph, date of birth
- Contact details – such as home and business address, telephone/email addresses
- Employment details – such as job title/position, practice location
- Background information – e.g. academic/professional qualifications, education, CV, concerns
- Spouse information, marital status
- Financial information – such as banking details
- IT information – information required to access Faculty IT such as IP addresses, login information
- Sensitive personal data ('special categories')

Generally the Faculty will not try not to collect or process any sensitive personal data relating to members or contacts of the Faculty. In some circumstances we may need to collect some sensitive personal data as part of our service provision for example data relating to racial/ethnic origin for the purposes of equal opportunities monitoring or health and safety assessment. The Faculty may also use personal information where it is considered necessary for complying with laws and regulation.

Purposes for processing personal information

The legal basis for collecting and using personal information described above will depend on the personal information concerned and the specific context in which it is collected. However, normally personal information will only be collected where we have your consent to do so, where we need the personal information to perform a contract i.e. provision of services, or where the processing is in the Faculty's legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases e.g. revalidation services, we may have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person. We have policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed without authorisation and only accessed or used for specific legal purposes. Lastly, we may

also collect and use personal information when it is necessary for other legitimate purposes such as running the Faculty more effectively – for example, for general IT security management when auditing access of website. We may also process your personal information to investigate violations of law or breaches of our own internal policies.

Who we share information with

The Faculty takes care to allow access to personal information only to those who require such access to perform their tasks and duties in relation to the provision of our services, and to third parties who have a legitimate purpose for accessing it to support these purposes. Whenever we permit a third party to access personal information, we will implement appropriate measures to ensure the information is used in a manner consistent with this notice and that the security and confidentiality of the information is maintained. In addition we make certain personal information available to third parties who provide services to us. The Faculty does so on a "need to know" basis with appropriate security measures in place – this is done in accordance with applicable data privacy law. A list of key service providers can be found at the end of this document

The Faculty may also share personal information to third parties on other lawful grounds, including:

- To comply with our legal obligations, including where necessary to abide by law, regulation or contract, or to respond to a court order, administrative or judicial process
- In response to lawful requests by public authorities
- As necessary to establish, exercise or defend against potential, threatened or actual litigation
- Where necessary to protect the vital interests of Faculty employees or another person
- In connection with the sale, assignment, hibernation or other transfer of all or part of the Faculty
- With your expressed consent

Transfer of personal information abroad

The Faculty may need to transfer personal information to countries other than the one in which the information was originally collected. When we export your personal information to a different country steps will be taken to ensure that such data exports comply with applicable laws. For example, if we transfer personal information from the European Economic Area to a country outside it, such as the United States, we will implement an appropriate data export solution such as entering into EU standard contractual clauses with the data importer or taking other measures to provide an adequate level of data protection under EU law.

Data retention periods

Personal information will be stored in accordance with applicable laws and kept for as long as needed to carry out the purposes described in this policy or as otherwise required by applicable law.

Data privacy rights

The following rights are available under applicable data protection law:

- Access, correct, update or request deletion of personal information
- Object to processing of personal information, asking the Faculty to restrict processing of personal information or request portability of personal information
- If the Faculty have collected and processed personal information using a person's consent then this can be withdrawn at any time. Withdrawing consent will not affect the lawfulness of any processing

conducted prior to withdrawal nor affect processing of personal information conducted in reliance on lawful processing grounds other than consent

- The right to complain to a data protection authority about our collection and use of personal information. In the United Kingdom the data protection authority is the Information Commissioner's Office whose website is <https://ico.org.uk/>

The Faculty will respond to all requests received from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. You can read more about these rights at: <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

Updates to this policy

This policy may be updated periodically to reflect any necessary changes in our privacy practices. In such cases an updated version of this document will be available from the Faculty website www.facultyofhomeopathy.org The Faculty encourages members to check this notice periodically to be aware of the most recent version.

Third party organisations:

The following are the Faculty's key partners in relation to storage and manipulation of members' data:

Microsoft – The Faculty makes use of the Microsoft Office suite of products including Microsoft Outlook e-mail client. Please see Microsoft's Privacy Notice for more information, available at <https://privacy.microsoft.com/en-gb/privacystatement>

Blackbaud Europe – the Faculty makes use of Blackbaud's "Raiser's Edge" database product through a shared service arrangement with the British Homeopathic Association (BHA), for the storage of members' data. The British Homeopathic Association Privacy Policy is available at <https://www.britishhomeopathic.org/privacy-policy/>. Blackbaud Europe <https://www.blackbaud.co.uk/privacy-policy>

Data may also be shared with third-parties to meet legal requirements, where the Faculty outsources parts of its services or when providing specific services. These organisations may include, but are not limited to, the following:

British Homeopathic Association – member communications services

Admix Events – digital, web and communications services

Raycon Ltd – desktop / helpdesk support

Sage – accounting

e-FM Ltd – Faculty financial advice, support and payments processing

Sue Thorn Consulting Ltd – *Homeopathy the Journal* business development

HMRC

Hotel groups / venues – Faculty Congress or other meeting related information