

# **Privacy Policy**

(Last updated November 2018)

It is our policy to collect, process and share your Data provided to us by you in order to carry out the services requested by you and any contact in relation to those services only. Your Data will not be used for any other purposes other than those explicitly stated in this policy or requested by you in your dealings with us.

This Privacy Policy describes how the Irish Massage Therapists Association (IMTA) collects, uses, protects, processes and shares your personal data (Data) when you become a member, communicate directly with us or otherwise interact with us.

This Privacy Policy does not apply to the information processed by third parties on behalf of IMTA, however we have reviewed their Privacy Policy's and are happy they meet General Data Protection Regulations 2018 (GDPR) standards.

We may update this Privacy Policy at any time to ensure we can carry out the services we provide in the most effective and efficient way possible. If we make changes we will notify you by revising the date on our published document on our website and in clinic, or for more substantial changes by contracting you via email or text to seek consent.

## 1. The identity of the controller.

You are hereby informed that the Data that you provide is collected, used, protected, processed and shared by the current executive committee on behalf of the IMTA.

#### 2. Collection of Data

We may collect Data about our members, prospects and visitors.

Your Data are collected when you browse our website, contact us via email, phone or in person or through our website.

Data we collect fall into the following categories:

- Identification information
- Contact information
- Educational and professional information
- Browsing information

These Data are gathered directly from you via online membership application and from direct communication with us, i.e. membership application form, emails, phone calls. Browsing history is collected via automated methods.

## 2.1. Information you provide to us

We process Data you provide directly to us, in particular when you complete a membership application form or create an online account with us.

For example, we collect Data when you apply for membership or renewal, register for an event or an online course, apply for a job, request customer support or otherwise communicate with us.

The Data may include the following data as well as any other type of information that we specifically request you to provide to us through our membership application forms, such as:

- Names
- Address
- Date of Birth
- Phone no
- Email
- Qualifications
- Work contact details
- Insurance details
- Browsing data

## 2.2. Data We collect automatically when you use our online services

When you access or use our online services, we automatically collect the following information about you:

- <u>Log Information</u>: We log information about your use of the Services, including the type of browser you use, access times, pages viewed, your IP address and the page you visited before navigating to Our Services.
- <u>Device Information</u>: We collect information about the computer or mobile device you use to access Our Services, including the hardware model, operating system and version, unique device identifiers and mobile network information.
- Location Information: We may with your consent collect information about the location of your device each time you access or use one of Our mobile applications. If you initially consent to Our collection of location information, you may be able to subsequently stop the collection of these Data through your device operating system settings. You may also stop Our collection of location information by following the standard uninstall process to remove Our mobile applications from your device.

## 2.3. Information we collect automatically through Cookies and other tracking technology

We may use cookies, web beacon and other similar technologies on our online Services to collect information and provide you with the services or products that you have requested.

A "cookie" is a small text file that is placed onto an Internet user's web browser or device and which is used to record information related to the navigation or the use of a device or a website.

A "web beacon" is a small object or image that is embedded into a web page, application, or email and is used to track activity. They are also sometimes referred to as pixels and tags (also known as "tracking pixels"). It may be used in Our Services or emails and help deliver cookies, count visits, understand usage and campaign effectiveness and determine whether an email has been opened and acted upon. For more information about cookies, and how to disable them, please see "Your Choices" below.

We use cookies and other similar technologies to collect information for the purposes described in this Privacy Policy. We may also combine the information collected by these technologies with information we have collected about you by other means that are described in this Privacy Policy.

Some of the cookies are used for the exclusive purpose of enabling or facilitating communication or are strictly necessary for the provision of our online services.

These are essentially of session cookies for authenticating and connecting to our online services, as well as memorizing navigation items during a session.

You have the ability to decline cookies by changing the settings on your browser but this might prevent you from benefiting from some elements of our online services. You can also consult or destroy cookies if you wish, since they are stored on your hard disk.

We may also use these technologies for other purposes than our online service operation such as:

- To improve our online services;
- To remember you, for your convenience, when you use our online services.

We inform you, in particular, that We use Google Analytics to collect information about use of our online services. We do not combine the information collected through the use of Google Analytics with personally identifiable information. We inform you that Google Analytics plants a permanent cookie on your web browser to identify you as a unique user the next time you visit our site, the cookie cannot be used by anyone but Google. Google's ability to use and share information collected by Google Analytics about your visits to this site is restricted by the Google Analytics Terms of Use and the Google Privacy Policy. You can prevent Google Analytics from recognizing you on return visits to this site by disabling cookies on your browser. For more information on Google Analytics, please visit Google Analytics.

## 2.4. Third Party Cookies

When you access or use our online services, one or more cookies from third party are likely to be placed on your equipment.

We inform you that we have no access and cannot exercise any control over third party cookies. However, we shall ensure that the partner companies agree to process the information collected on our online services in compliance with the GDPR and undertake to implement appropriate measures for securing and protecting the confidentiality of the Data.

### 3. How we use the Data

We may use information about you for the following purposes:

- provide, maintain and improve our services
- provide and deliver the service you request, process transactions and send you related information including application processing updates, invoices, renewal reminders, receipts
- send you technical notices, updates, security alerts and support and administrative messages
- send you industry advertisements and association news relevant to your membership
- respond to your comments, questions, requests and provide customer service
- monitor and analyse trends, usage and activities in connection with our services
- personalize and improve the services we provide

According to the GDPR, each Data processing is performed on one of the following legal basis:

- your consent
- the performance of the service requested by you

## 4. How we share your Data

- We share your Data with our online membership management system to help us provide our service including membership database management, transactions, renewals etc.
- In response to a request for information if we are required by, or believe disclosure is required by, any applicable law, regulation or legal process, including in connection with lawful requests by law enforcement, national security, or other public authorities.

## 5. The period of Data retention

I would like to say we hold onto membership files indefinitely but we are missing many files.

## 6. Data transfer

Upon receiving a written request from you seeking Data transfer, we will provide a copy of your original file that we hold with no alterations from the original. These will be handed in person or send by registered post.

## 7. Data amendments

Upon receiving a request from you in regards to updating Data held by us, the General Secretary will seek to correct our records at the earliest possible time.

## 8. Security

We are committed to taking appropriate measures designed to keep your Data secure. Our technical, administrative and physical procedures are designed to protect Data from loss, theft, misuse and accidental, unlawful or unauthorized access, disclosure, alteration, use and destruction. We follow generally accepted standards to protect the personal information submitted to us, both during transmission and once it is received.

## 9. Your rights

Under the General Data Protection Regulations 2018 (GDPR) individuals have the significantly strengthened rights to:

- obtain details about how their data is processed by an organisation or business;
- obtain copies of personal data that an organisation holds on them;
- have incorrect or incomplete data corrected;
- have their data erased by an organisation, where, for example, the organisation has no legitimate reason for retaining the data;
- obtain their data from an organisation and to have that data transmitted to another organisation (Data Portability);
- object to the processing of their data by an organisation in certain circumstances;
- not to be subject to (with some exceptions) automated decision making, including profiling.

#### 10. In the event of a Breach

Every precaution will be taken to avoid a breach of your Data, but if such a breach should occur, it will be documented, assessed as to its severity and appropriate action taken. The Data Proctection Commissioner will be informed, An Garda Siochana and financial institutions will be contacted for assistance and you will be contacted to help you take steps to mitigate the risks to yourself, if it is deemed a severe enough breach as to put you, your identity, your financial means etc. at risk.