

# APAC Privacy Notice - For Trainees, Clients and General Users



## Introduction

Academy of Play and Child Psychotherapy (APAC) Privacy Policy is in accordance with de facto web site standards.

We will only collect information in accordance with the Data Protection Act 1998. Our contact details are listed below. APAC's Privacy Statement follows: APAC (ICO registration Z5023611) takes your privacy very seriously. This Privacy Notice is intended to set out your rights and answer any queries you may have about your personal data. If you need more information, please contact:

Data Controller Eileen Braham [eileen@apac.org.uk](mailto:eileen@apac.org.uk)

Our personal information handling policy and procedures have been developed in line with the requirements of the 1995 European Union Data Protection Directive (Directive 95/46/EC) and the General Data Protection Regulation (in force from 25 May 2018) and applicable national law.

### 1. What information do we collect?

We collect and process personal data about you and if you are a registrant your clients and clinical supervisor when you communicate with us and our services and when you purchase goods and services from us. The personal data we process includes:

- your name;
- your PTUK membership number and password.
- your home or work address, email address and/or phone number;
- your job title;
- your professional revalidation data
- your payment and delivery details for our journals, professional documents, certificates, including billing and delivery addresses and credit card details, when you make purchases from us;
- information related to the browser or device you use to access our web site;
- internet browser cookies and operating system data;
- and/or any other information you provide

### 2. How do we use this information and what is the legal basis for this use?

We process the personal data listed in section 1 above for the following purposes:

- as required to establish and fulfil a contract with you, for example, if you make a purchase from us or enter into an agreement to provide or receive services. This may include verifying your identity, taking payments, communicating with you, providing customer services and arranging the delivery or other provision of products or services. We require this information in order to enter into a contract with you and are unable to do so without it;
- to comply with applicable law and the requirements of the Professional Standards Authority in the accreditation of the 'Register of Play and Creative Arts Therapists';
- in accordance with our legitimate interests in protecting APAC's legitimate professional interests and legal rights, including but not limited to use in connection with legal claims, compliance, regulatory and investigative purposes (including disclosure of such information in

connection with legal process or litigation).

- with your express consent to respond to any comments or complaints we may receive from you, and/or in accordance with our legitimate interests including to investigate any complaints received from you or from others, about our web site or our products or services;
- we may use information you provide to personalise (i) our communications to you; (ii) our web site; and (iii) products or services for you, in accordance with our legitimate interests;
- to monitor use of our web sites and online services. We may use your information to help us check, improve and protect our products, content, services and web sites, both online and offline, in accordance with our legitimate interests;
- if you provide a credit or debit card, we may also use third parties (such as POS payment providers) to check the validity of the sort code, account number and card number you submit in order to prevent fraud, in accordance with our legitimate interests and those of third parties;
- we may monitor any customer account to prevent, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime, in accordance with applicable law and our legitimate interests;
- in circumstances where you contact us by telephone, calls may be recorded for quality, training and security purposes, in accordance with our legitimate interests; and
- we may use your information to invite you to take part in market research or surveys.

**Legitimate interest** – APAC need to communicate the facts that the recipients need to have to comply with their professional and training obligations to enable safe and effective therapeutic practice with children and meet the standards of the ‘Register of Play and Creative Arts Therapists’ accredited by the Professional Standards Authority. The Register’s occupation title of the recipient is included in the communication. Recipients may also include those who have an influence upon the current and future work of our registrants in the matter of children’s emotional well-being and mental health.

### **3. With whom and where will we share your personal data?**

We may also share your personal data with the below third parties:

- our professional advisors such as our auditors and external legal and financial advisors;
- other registrants and other Professional Standards Authority Accredited Registers;
- personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if needed for the legal protection of our legitimate interests in compliance with applicable laws;
- personal data may also be shared with third party service providers who will process it on behalf of APAC for the purposes above. Such third parties include, but are not limited to, providers of APAC hosting, email services, maintenance, call centre operation and identity checking.
- in the unlikely event that our organisation or any part of it is sold or integrated with another organisation, your details will be disclosed to our advisers and those of any prospective

purchaser and will be passed to the new owners of the organisation.

#### **4. How long will you keep my personal data?**

We will not keep your personal information for any purpose for longer than is necessary and will only retain the personal information that is necessary in relation to the purpose. We are also required to retain certain information as required by law or for as long as is reasonably necessary to meet regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our terms and conditions.

Where you are a registrant, we will keep your information and those required for annual revalidation for your lifetime to provide evidence for the public and yourself in the event of a complaint against you.

Where you are a prospective registrant and you have expressly consented to us contacting you, we will only retain your data (a) until you unsubscribe from our communications; or, if you have not unsubscribed, (b) while you interact with us and our content; or (c) for 5 years from when you last interacted with us or our content.

In the case of any contact you may have with our support services team, we will retain those details for as long as is necessary to resolve your query and for two years after the query is closed.

We will retain your data for a short time beyond the specified retention period, to allow for information to be reviewed and any deletion to take place. In some instances, laws may require APAC to hold certain information for specific periods other than those listed above.

#### **5. Where are my data stored?**

Your data are stored on APAC's server located in the UK which is not directly connected to the Internet. The personal data that we collect from you may be transferred to, and stored outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers, in which case the third country's data protection laws will have been approved as adequate by the European Commission or other applicable safeguards are in place.

#### **6. What are my rights in relation to my personal data?**

If the information we hold about you is inaccurate or incomplete, you can notify us and ask us to correct or supplement it. You also have the right, with some exceptions and qualifications, to ask us to provide a copy of any personal data we hold about you.

Where you have provided your data to us and it is processed by automated means, you may be able to request that we provide it to you in a structured, machine readable format.

If you have a complaint about how we have handled your personal data, you may be able to ask us to restrict how we use your personal data while your complaint is resolved. In some circumstances you can ask us to erase your personal data (a) by withdrawing your consent for us to use it; (b) if it is no longer necessary for us to use your personal data; (c) if you object to the use of your personal data and we don't have a good reason to continue to use it; or (d) if we haven't handled your personal data in accordance with our obligations.

## **7. Where can I find more information about APAC's handling of my data?**

Should you have any queries regarding this Privacy Notice, about APAC's processing of your personal data or wish to exercise your rights, you can contact APAC's Data Controller using this email address [eileen@apac.org.uk](mailto:eileen@apac.org.uk)

If you are not happy with our response, you can contact the Information Commissioner's Office: <https://ico.org.uk/>

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