



Privacy Notice – For Trainees, Clients and General Users

ACADEMY OF PLAY AND CHILD PSYCHOTHERAPY

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Introduction:

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

We will only collect information in accordance with the Data Protection Act 2018.

Our contact details are listed below.

APAC's Privacy Statement follows: Academy of Play and Child Psychotherapy (ICO registration Z5023611) (APAC) 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 Protection Officer, Radek Kwietniewski, at dpo@apac.org.uk

Our personal information handling policy and procedures have been developed in line with the requirements of 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 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 purchase from us;
- Information related to the browser or device you use to access our website;
- 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. 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 Standard 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 website or our products or services;
- We may use information you provide to personalise (i) our communication to you; (ii) our website; and (iii) products and services for you, in accordance with our legitimate interests;
- To monitor the use of our website and online services. We may use your information to help us check, improve and protect our products, content, services and websites, 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 third parties;
- We may monitor any customer account to prevent, investigate and/ or report fraud, terrorism, misinterpretation, 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 Standard Authority (PSA).

The Register’s occupation title of the recipient is included in the communication. Recipients may also include those who influence 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 Standard Authority Accredited Registers;
- Personal data may be shared with government authorities and/ or law enforcement officials if required for the purpose 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 purpose 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 we keep your 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 PTUK 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 PTUK 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 your 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 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 your rights in relation to your personal data?

Under data protection law you have the rights in relation to your personal data that include the rights to:

- **Request Access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check we are lawfully processing it.
- **Request Correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected; although we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data ("also known as the right to be forgotten"). This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with the local law. Note, however, that we may not always be able to comply with your request for erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Where you object to direct marketing, we shall maintain a restricted record of Contact and Identity Data recording that you have opted out of receiving marketing and we can ensure no future marketing is carried out. Unless otherwise informed no other processing shall be carried out in relation to this restricted record.

- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or a third party. We will provide you, or a third party you have chosen, your personal data in a structured,

commonly used, machine-readable format. Note this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of these rights set out above, please email us at dpo@apac.org.uk

You will not have to pay a fee to access your personal data (or exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive or refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk) We would be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

7. Where can you 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 Protection Officer using this email address: dpo@apac.org.uk

If you are not happy with our response, you can contact the Information Commissioner's Office: [HTTPS://ICO.ORG.UK/](https://ico.org.uk/)

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