

## FSRH Privacy and Data Protection Policy

(Last updated July 2020)

### General

This is the privacy and data protection policy for FSRH. It sets out how we collect, use, store and protect any information that you give us, in compliance with the requirements of the Data Protection Laws which are the EU General Data Protection Regulation (GDPR) 2016/679 and the UK Data Protection Act 2018.

Should we ask you to provide certain information by which you can be identified when using our website, it will only be used in accordance with this policy.

This policy (together with our [Website Terms of Use policy](#)), sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

### Your consent

By using our website, you are accepting and consenting to the practices described in this policy, and our [Website Terms of Use Policy](#), and [Cookie Policy](#).

We may occasionally update this policy. You should check from time to time to ensure that you are happy with any changes.

### What personal data do we collect, how and why?

The data we collect comes from a variety of sources:

- information you give us;
- information we collect about you.

### Information you give us

You may give us information about you by filling in our online forms or registering on our website or by corresponding with us by phone, email or otherwise.

We currently collect and store the following information about individuals who are either undertaking an FSRH qualification, or who are already FSRH members:

- full name;
- contact information including email and postal address and telephone numbers;
- demographic information such as nationality, gender, ethnicity, sexual orientation, date of birth, job title and role;
- Regulatory body number;
- historical financial information about your membership subscriptions and other payments;
- information necessary for direct debit payments relating to membership subscriptions.

You may only pass us another individual's personal data if you have that person's consent to do so on the understanding that their personal data will be processed as described in this policy.

### Information we collect about you

On each of your visits to our website we may automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page, and;
- any phone number used to call our customer service number.

We may collect, store and use personal information you provide to us when you:

- order from us;
- request information from us;
- subscribe to our e-newsletter;
- provide a business card for the explicit purpose of correspondence and contact;
- make an application to work for us.

The data you provide to use may include:

- name, address, postcode, country, email address, fax number, telephone number;
- how you heard about us;
- information relating to purchases you have made, including payment details;
- information relating to customer surveys or offers;
- (for trade customers), company name, trading address, registration number, website, VAT number, number of employees, trade reference;
- finance application data, where finance has been applied for;
- work experience and interview notes when you apply to work for us;
- any other personal information that you choose to send us.

Please let us know if the personal data we hold about you needs to be corrected or updated.

### **How do we use your information?**

All personal information that we obtain about you will be recorded, used, and protected by us in accordance with current Data Protection Laws and this policy. We may be asked by regulatory bodies (such as the GMC) to provide data on the SRH workforce. Data shared with external bodies is always anonymised. The information that you choose to share will also help us at FSRH to better understand our SRH workforce. Your information will help us to continually develop and improve the availability of our qualifications, guidance and training to the wider SRH workforce.

### **Legal basis for processing the data**

One of the lawful reasons for processing data under the GDPR is 'Legitimate Interest'. This means that we can process your personal information if we have a genuine and legitimate reason and we are not harming any of your rights and interests.

When you provide your personal details to us, we will use your information for our legitimate business interests to carry out our work as a professional body and charity. Before doing this, we will carefully consider and balance any potential impact on you and your rights.

We will primarily use your personal information to provide our services to you and, for example:

- to administer and process your membership;
- to provide you with membership services and benefits;

- for record keeping purposes;
- for statistical and demographic research;
- to carry out market research so that we can improve the services we offer;
- to track activity on our website and via our e-communications for their improvement;
- to provide you with details about the development of our services, including information about us;
- to send you email bulletins, where these have been requested, which we believe might be of interest to you. If at any time you would like to unsubscribe from receiving emails, we include unsubscribe options at the bottom of each email we send you.

We may contact you by email, phone, post or social media unless you indicate otherwise when you supply your data to us.

The other legal reasons for processing are for:

- the processing is necessary to meet contractual obligations into which you have entered as a member, customer, worker, volunteer or supplier;
- when you give us consent to process your personal information;
- when it is our legal duty such as: HMRC or the police.

### **How long we keep your personal information**

We only keep your personal information for as long as we need to, so that we can use it for the reasons described above. Where your information is no longer required, or is no longer relevant, we will ensure it is disposed of securely.

The actual period for which we store your personal information will vary depending on the type of personal information and how it is used.

### **Your rights and control over your personal data**

Under the GDPR, you have the right to:

- **ask us what personal information we hold about you, and to ask us to update, amend or delete any data that is incorrect or out of date.**  
As data controller, we will be as clear and transparent as possible and uphold any requests for data disclosure or amendment as soon as possible. To do this, you must make a [Subject Access Request using our online form](#).  
To protect your privacy and security we may need to verify your identity before disclosing or deleting your data. It may take up to a month for an amendment to become effective
- **rectify, erase or restrict your information, where this is justified.**  
The accuracy of your personal data is important to us. You can log in and [update your personal data online](#), including your address and contact details at any time. If you find any inaccuracy in your data at any time, we will delete or correct it promptly at your request. Proof of identity may be required.
- **object to the processing of your information, where this is justified.**  
You have the right to object to, 'block' or suppress your personal data being processed, for marketing and for research purposes. However, we will retain just enough of your personal data to ensure that the restriction is respected in the future. You can [change your preferences by logging in online](#) or contact our office.

- **The right to make a complaint to the data protection regulator**

The ICO is the UK's independent body set up to uphold your rights to data privacy. They can be contacted at The Office of the Information Commissioner (ICO), Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF, tel: +44 (0) 01625 545745, and online at [www.ico.org.uk](http://www.ico.org.uk).

To exercise any of these rights, please contact the [FSRH Privacy Officer](#).

### **Data transfers**

Your personal data may be stored, processed, and transferred outside the EEA so that we can use your personal data as described in this policy. European data protection laws include specific rules on transferring personal information outside the EEA.

When transferring personal information outside the EEA, we will:

- include standard data protection clauses approved by the European Commission for transferring personal information outside the EEA into our contracts with those third parties (these are the clauses approved under Article 46.2 of the GDPR); or
- ensure that the country in which your personal information will be handled has been deemed "adequate" by the European Commission under Article 45 of the GDPR.

Transfers to the USA will be conducted under the EU US Privacy Shield.

### **Do you disclose my personal data?**

We do not sell trade or otherwise transfer your personally identifiable information to third parties.

To deliver our services to you, we may need to disclose some of the personal information we process about you with staff, trusted suppliers and partners under our control.

We shall keep your personal data within FSRH and our trusted third parties except where disclosure is required by law, for example to government bodies and law enforcement agencies.

Where necessary or required we disclose information to:

- individuals regarding their own membership - you have the right to make a [Subject Access Request](#) to find out what personal data we hold about you;
- current, past and prospective employees of FSRH - we require requests to be made in writing so that we can assess the nature of the enquiry. In compliance with the DPA, GDPR, we will not disclose personally identifiable information, but we do reserve the right to confirm / deny whether your membership subscriptions and qualifications are up to date;
- financial organisations - we share your financial data to process your membership payments, and payments for qualifications;
- trusted third parties who assist us in operating our website, conducting our business, or servicing you, provided that those parties agree to keep this information confidential.

### **How do you contact members?**

We currently communicate with our members via post, email and telephone.

As part of our commitment to reducing administration costs and streamlining membership services and communications, we are transitioning to sending all membership subscription reminder notices and other reminders regarding recertification by email.

As part of FSRH membership, we also send the BMJ Sexual and Reproductive Healthcare Journal by post.

It is your responsibility to ensure that your contact details are up to date, so that we can continue to send you reminders, the Journal and the latest clinical guidance as part of your membership package. [Update your details online](#) by logging in to your account on our website.

### **Is my information secure?**

We are committed to ensuring that your information is safe. Your information will be held in a secure environment, and access to it will be restricted according to the “need to know” principle. To prevent unauthorized access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and protect the information we collect online.

### **Cookies and similar tracking technology**

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website. By continuing to browse the website, you are agreeing to our use of cookies. Please see our separate [Cookie Policy](#).

### **Links to other websites**

Our website may contain links to other websites. Once you have used these links to leave our website, you should note that we do not have any control over the website that you visit. We cannot be responsible for the protection and privacy of any information which you may provide whilst visiting such websites and such websites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

### **Membership terms and conditions**

Please read our separate [Membership Terms and Conditions Policy](#) and our [membership FAQs](#) for more information about member services, communications and payment policies.

For any queries relating to this policy and its application, please write to FSRH, 10-18 Union Street, London SE1 1SZ or email: [info@fsrh.org](mailto:info@fsrh.org).