

## BRITISH PSYCHOANALYTIC COUNCIL PRIVACY POLICY

The British Psychoanalytic Council ("**BPC**" / "**we**" / "**our**" / "**us**") is committed to protecting and respecting your privacy. This policy sets out the basis on which any personal data that we collect from you, or that you or others provide to us, including when using this website ([www.bpc.org.uk](http://www.bpc.org.uk)), will be processed.

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Please read the following carefully to understand how we will treat your personal data.

### 1. ABOUT US

- 1.1 The British Psychoanalytic Council is a company limited by guarantee registered in England under company number 05034324 whose registered office is at Suite 7, 19-23 Wedmore Street, London N19 4RU. The BPC is the data controller in respect of your personal data. This means that we are responsible for deciding how we hold and use personal data about you.

### 2. WHAT INFORMATION WE COLLECT AND HOW WE WILL USE IT

We collect personal data so that we can operate effectively and provide you with the best possible service. The information we collect depends on the context of your interactions with us and with our website. It also depends on the choices you make, for example the functions you use and your privacy settings. You may choose not to provide certain information but if you do, and that information is necessary to provide a particular feature, then you may not be able to use that feature. We will only use your personal data where we have a valid lawful basis to do so.

The table below summarises what information we collect about you, explains how we intend to use it and what our legal basis is for using it. The information that we hold and process about you will depend upon whether you are:

- a “**Visitor**” to our website;
- a “**Therapist**” or in training to become a Therapist; or
- an “**Enquirer**” (through the website or otherwise) consulting our register, wishing to find out more about our services or in relation to working with us, or wishing to raise a concern or complaint about a Therapist.

<b>Visitors</b>			
<b><i>What information will we collect about you?</i></b>	<b><i>How will we collect information about you?</i></b>	<b><i>Why are we processing information about you?</i></b>	<b><i>What is our legal basis for processing information about you?</i></b>
<b>Device and usage data including IP addresses and device identifiers</b>  <b>Device event information including crash logs, hardware settings, browser type and browser language</b>	Automatically collected and stored in our server logs when you interact with our website	To improve the user experience of our website, including to offer you tailored content, and to protect the security of our website.	To pursue our legitimate interests, in particular to understand how our website is used, to improve the user experience of our website, and to maintain the security of our website.
<b>Information derived from cookies and similar technologies</b>	Google analytics	To analyse the traffic to our website	As applicable, your consent or to pursue our legitimate business interests as described above.

<b><i>Enquirers</i></b>			
<b><i>What information will we collect about you?</i></b>	<b><i>How will we collect information about you?</i></b>	<b><i>Why are we processing information about you?</i></b>	<b><i>What is our legal basis for processing information about you?</i></b>
<b>Name, contact details, areas of enquiry</b>	Provided by you	In order to offer you services that may be of interest to you	To pursue our legitimate interests
<b>Name, contact details, job title, areas of expertise, products and services offered, payment information, credit/other references, correspondence and associated records</b>	Provided by you and (as applicable) provided by third parties	In order for us to enter into contracts for you or us to supply goods and/or services, or with a view to working together	To pursue our legitimate interests and (as applicable) to comply with our legal obligations and/or to perform our contractual obligations and/or to take steps in advance of entry into a contract
<b>Name, contact details, details of concerns / complaints and any other information you provide</b>	Provided by you	In order for the BPC to investigate and take appropriate action in response to a concern or complaint about a therapist registered with the BPC.	To pursue our legitimate interests as the operator of a public register of professionals and (as applicable) your consent.

<b><i>Therapists and trainees</i></b>			
<b><i>What information will we collect about you?</i></b>	<b><i>How will we collect information about you?</i></b>	<b><i>Why are we processing information about you?</i></b>	<b><i>What is our legal basis for processing information about you?</i></b>

<p><b>Name, contact details, clinic/affiliation, professional qualifications and accreditations, areas of practice, therapies offered, membership number and other details, payment details.</b></p>	<p>Provided by you / allocated by us (we may additional receive or verify information by contacting relevant third parties)</p>	<p>In order for you to become a registered member of the BPC and for maintenance of our public register.</p>	<p>To pursue our legitimate interests as the operator of a public register of threapists.</p>
<p><b>Name, contact details, clinic/affiliation, professional qualifications and accreditations, areas of practice, therapies offered, areas of professional interest</b></p>	<p>Provided by you</p>	<p>In order for the BPC to set professional standards that a registrant of the BPC will need to meet through CPD submissions. Development services including BPC accredited courses.</p>	<p>To pursue our legitimate interests and (as applicable) your consent to receive marketing communications.</p>
<p><b>Name, contact details, clinic/affiliation, professional qualifications and accreditations, areas of practice, therapies offered, areas of professional interest, details of concern / complaint and individual complainants</b></p>	<p>Provided by you and members of the public and/or fellow professionals</p>	<p>In order for the BPC to investigate and take appropriate action in response to a concern or complaint about a BPC registrant.</p>	<p>To pursue our legitimate interests as the operator of a register of professionals</p>
<p><b>Name, contact details, clinic/affiliation, professional qualifications and accreditations, areas</b></p>	<p>Provided by you / allocated by us</p>	<p>To provide you with a user/member account and enable you to use user/member facilities</p>	<p>To pursue our legitimate interests as the operator of a register of professionals and (as applicable) entering</p>

of practice, therapies offered, username, password, payment details.			into and performing a contract with you
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### 3. CHANGE OF PURPOSE

We may only use your personal data for the purposes for which we collected it, or for another reason that is compatible with the original purpose. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### 4. AUTOMATED DECISION-MAKING

Automated decision-making takes place when an electronic system uses personal data to make a decision without human intervention. Some of the functions on our website – e.g. the function that allows an Enquirer to search our register of Therapists – process personal data in an automated manner.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

### 5. SHARING YOUR INFORMATION

5.1 We may share your personal data with your consent or as necessary with selected third party service providers that support us in the performance of the activities set out in the [table](#) above.

5.2 We may also share your personal data with other third parties, for example in the context of the possible restructuring of our activities or the transfer of some of our responsibilities to another organisation. We may also need to share your personal data with a regulator or otherwise to comply with the law.

5.3 We require all our third party service providers and all other companies within our group to take appropriate security measures to protect your personal data in line with our policies. We do not allow our third party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes in accordance with our instructions.

5.4 The following third-party service providers process personal data about you for the following purposes:

**Landau Morley LLP** processes on behalf of the **BPC** is: suppliers' and customers' contact details included on Xero and personal personnel data processed on Sage Payroll, as well as the British Psychoanalytic Council's annual report and management of accounts. The reason **Landau Morley LLP** processes this data is to: provide accounting and payroll services.

**Circle Interactive** processes on behalf of the **BPC** is: the registrants and member institution details. A list of contact details for recipients of British Psychoanalytic Council's contain the names, titles, email and postal addresses of approximately 2,000 contacts, as well as detailed professional activities. The reason **Circle Interactive** processes this data is to: host and maintain CiviCRM and Drupal, and provide database and website support and development services.

**E-centriQ Ltd** processes this data is to: manage the installation and configuration (systems, software, networks, internet, and more); to provide IT support and solutions; and preventive maintenance. Data processed by **E-centriQ Ltd** on behalf of **British Psychoanalytic Council** should only ever be used for **British Psychoanalytic Council's** purposes as specified and authorised by **British Psychoanalytic Council**. **E-centriQ Ltd** must keep records of the processing activities they carry out on behalf of **British Psychoanalytic Council**.

## **6. STORING YOUR INFORMATION**

- 6.1 The personal data that we hold about you will only be processed and stored within the United Kingdom.
- 6.2 We will only retain your personal data for as long as is necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting obligations. For example, we may need to retain some of your personal data for 6 years after you have made a purchase from us for legal reasons.

## **7. KEEPING YOUR INFORMATION SECURE**

- 7.1 All information that you provide to us is stored on secure servers. We have put in place appropriate measures to protect the security of your information.
- 7.2 The transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of the information transmitted to our site and you acknowledge that any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access or inadvertent disclosure.
- 7.3 You are responsible for keeping confidential any passwords that you have to access our services including and used to log-in to our website. Please do not share your password(s) with anyone else. If you lose control of your password you may lose control over your personal data. If your password has been compromised for any reason please let us know immediately by contacting us at: Telephone 020 7561 9240

## **8. YOUR RIGHTS**

- 8.1 You have the right under data protection laws to:
- (a) 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 that we are lawfully processing it. This right is subject to a number of exemptions which allow information to be withheld in certain circumstances. For example, subject access rights are excluded where compliance would involve disclosing: information relating to another individual; data which consists of

information which is subject to legal professional privilege; negotiations or confidential references;

- (b) request correction or erasure of your personal data (unless we have the legal right to retain it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below);
- (c) 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. You also have the right to object where we are processing your personal data for direct marketing purposes;
- (d) request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it;
- (e) request (in limited circumstances) the transfer of your personal data to another data controller;
- (f) change your data processing preferences at any time.

8.2 If you have a user/member account with us, you can update your account settings by signing in to your account on the website. If you wish to exercise any of the above rights then you may do so by contacting us by email at: Telephone 020 7561 9240

8.3 We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights).

8.4 You should be aware that if you ask us to stop processing your personal data in a certain way or erase your personal data, and this type of processing or data is needed to facilitate your use of the website you may not be able to use the website as you did before. Similarly, if you decline to provide personal data which is necessary in order for us to provide services to you, then we will be unable to provide those services. This does not include your right to object to direct marketing, or your right to withdraw consent for any data processing which is based solely upon your consent. These rights may be exercised at any time without restriction.

## **9. MARKETING**

9.1 We would like to send you information by email about products and services which may be of interest to you (including, for example promotional materials and newsletters). We will only do this with your consent.

9.2 You have the right at any time to stop us from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, you can unsubscribe by using the “unsubscribe” link at the bottom of our marketing messages.

**10. OTHER WEBSITES**

Our website may contain links to other website. This privacy policy only applies to this website so when you link to other websites you should read their own privacy policies.

**11. CHANGES TO THIS PRIVACY POLICY**

We keep our privacy policy under regular review and will post any updates on this webpage. This privacy policy was last updated in May 2018.

**12. HOW TO CONTACT US AND COMPLAINTS**

12.1 The British Psychoanalytical Council is the data controller in respect of your personal data.

12.2 If for any reason you are not happy with the way that we have handled your personal data, please contact us at telephone 020 7561 9240. If you are still not happy, you have the right to make a make a complaint to the Information Commissioner's Office see: <https://ico.org.uk/global/contact-us/>.