

## Privacy Statement

At Practices made Perfect, we are committed to respecting and protecting your privacy.

This Statement explains why and when we collect personal information about people who visit our website, how we keep it secure, how we use it and the conditions under which we may disclose it to others. This privacy Statement must be read together with any other privacy notices we may provide and is not intended to override them.

We may change this Statement occasionally so please check this page from time to time to ensure that you are happy with any changes. By using our services and website, you are agreeing to be bound by this Statement.

If you have questions regarding this Statement and/or our privacy practices, contact us by email at [office@practices.co.uk](mailto:office@practices.co.uk) or telephone 0845 862 0372.

As the Data controller, we determine the purpose for which and the manner in which your personal data is or may be processed. Processing means how we handle your data in relations to information or data we have obtained, recorded or are holding. The information or data that we carry out any operation or set of operations which includes;

- organisation, adaption or alteration of the information or data,
- retrieval, consultation or use of the information or data,
- disclosure of the information or data by transmission, dissemination or otherwise making available or
- alignment, combination blocking, erasure or destruction of the information or data

### Who are we?

We are Practices Made Perfect. We offer policy and strategy development workshops and masterclasses as part of local leadership development and planning programmes. Bespoke strategic workforce planning and risk assessment modelling as part of national and local NHS workforce development programmes.

### What personal information or data do we collect about you?

The personal information or personal data means any information about an individual from which that person can be identified. More information can be found on the [Information Commissioners Office](#).

When you use our website, we obtain information about you.

We may collect, store, use and transfer General Personal data about you. This data includes first name, last name, username, title, billing address, delivery address, email address, telephone numbers and IP Address.

This includes demographic or statistical data for any purpose. Although this data may be derived from your personal data, it does not directly or indirectly reveal your identity and is not considered personal data in the regulation. We may use your usage date for statistical analysis of the using the website. However, if we connect or combine your date personal data that could directly or indirectly identify you, we will treat your personal data in accordance with this Statement.

We do not collect Special Categories of your personal data including details about your; political opinions, ethnicity or race, philosophical or religious beliefs, sexual orientation, sex life, trade union membership, health information, biometric, genetic data, criminal convictions or offences.

### **What if you refuse or fail to provide your personal data?**

By law or under the terms of a contract we have with you, we may need to collect your personal data. We may not be able to perform the contract we have with you or enter into a with you if you refuse or fail to provide the personal data we require. The means we may have to cancel the service or product you have requested from us. If this happens, we would notify you.

### **How do we collect your personal data?**

We collect your data using various methods from you and about you through by requesting marketing information and our products and services.

### **How do we use your personal data?**

Most commonly we will use your personal data, when the law allows us to, using the lawful basis(s) below:

- Contract – When you ask for a request, such as a quote, before entering into a contract or use one of our services or products.
- Legitimate Interest – If you have received a product, service or request for services we may contact you in order to give you the best product/service and most secure experience we will conduct and manage the interest of our business. We will ensure to balance and consider any potential your rights and impact on you, both negatively and positively, before processing your personal data for legitimate interests. We do not use your personal data for our interests and activities which override the impact on you. (unless we are permitted to by law or have your consent).

These activities may include keeping you up to date on our product, services, promotional offers, entered a competition, or registered for a promotion from us. We may use your contact, technical, profile data, usage, and identity to decide if we think you may need, be interested in or want in our product or services. This will include receiving marketing communications from us and in each case you have not opted out of receiving the marketing. You can opt out and any time by simply contacting us by emailing us [office@practices.co.uk](mailto:office@practices.co.uk) or telephone 0845 862 0372.

- Consent – If you are have not made a request for our product or services, like a quote, or have not used our products or services, you may still want to receive marketing and advertising from us. We this we need your consent. From time to time we would like to contact you with details of other [specify products]/[offers]/[services]/[competitions we provide. If you consent to us contacting, you for this purpose please tick to say how you would like us to contact you:

Email  Telephone

We will not pass your details onto other companies or organisations.

You can opt out and any time by simply contacting us by emailing us at office@practices.co.uk or telephone 0845 862 0372.

- Legal Obligation – We will process your personal data when necessary to comply with regulatory or legal obligation that we must comply with.

## Opting Out

We usually do not rely on consent as the lawful basis for processing your personal data. We will not sell your personal data to another company. We may use a third party to help us with direct marketing, such as sending a newsletter or other communications via email or text message. You have the right to withdraw consent to marketing at any time by simply contacting us by emailing us at office@practices.co.uk or telephone 0845 862 0372.

## Cookies

Your browser can be set to refuse some or all browser cookies, as well as alerting you to when websites access or set cookies. If you refuse or disable cookies, please note that some parts of our website may not function properly and become inaccessible. For more information about the cookies, we use to access the cookie Statement on our website when you first log in.

## Summary of how we use your personal data.

Activity or Purpose	Type of Data	Lawful basis for processing is:	Length of time data is held
Services or Product provided or sold to you. Or requested information on services or products, such as quotes.	General Data first name, last name, username, title, billing address, delivery address, email address, telephone numbers and IP Address.	Contract to perform a contract for you.	The duration required to comply with our legal and regulatory obligations.
Services or Product provided or sold to you. Or requested information on services or products, such as quotes.	General Data first name, last name, username, title, billing address, delivery address, email address, telephone numbers and IP Address.  Remember you can opt-out.	Legitimate Interest	The duration required to comply with our legal and regulatory obligations. Generally, this is the same length of time as information being held under Contract, unless you opt-out.
Services or Product provided or sold to you. Or requested information on services or products, such as quotes.	General Data first name, last name, username, title, billing address, delivery address, email address, telephone numbers and IP Address.	Legal Obligation	The duration required to comply with our legal and regulatory obligations.

<p>Requested marketing</p> <p>This requires you to opt-in.</p> <p>However, you have the right to opt out at any time.</p>	<p>General Data first name, last name, username, title, billing address, delivery address, email address, telephone numbers and IP Address.</p>	<p>Consent</p>	<p>For a maximum of three years. This is from the date of each request unless you opt-out.</p>
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### **Change of purpose.**

We only use your personal data for the purpose which we collected it unless for another reason we reasonably consider that we need to use it. The reason would be compatible with the original purpose. You can get an explanation of how the new purpose is compatible with the original purpose, by contacting us by emailing us at office@practices.co.uk or telephone 0845 862 0372. We will notify you if we need to use your personal data for an unrelated purpose and explain which legal basis allows us to do so.

### **Who do we share your personal data with?**

Occasionally we may have to share your personal data set out in the table above as set out below:

- External Third Parties Service:
  - HM Revenue & Customers, regulators and other authorities acting as processors or joint controllers based in the United Kingdom, who require reporting of processing activities in certain circumstances.
  - Professional advisers acting as processors or joint controllers including auditors, bankers, insurers, accountants, based in United Kingdom.
  - Providers acting as processors based across the world who provide IT and Systems Administration Services.
  - Third parties may on occasion act as sub-processors for Practices Made Perfect as a processor.
- Third parties who we may transfer, sell or merge parts of our business or assets. We may also seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data as set out in the privacy notice in the same way.

We require all third parties to treat your personal data in accordance with the law and respect to security. We only permit our third parties to process your personal data for in accordance with our instructions and specified purposes. We do not allow our third parties to use your personal data for their own purposes.

### **Do we transfer your data internationally?**

We share your personal data within our organisation This may involve transferring your data outside the European Economic Area (**EEA**).

Many of our external third parties are based outside the European Economic Area (**EEA**) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by implementing safeguards:

The same safe guards we use for all our IT uses. For more details contact us by emailing at [office@practices.co.uk](mailto:office@practices.co.uk) or telephone 0845 862 0372.

### **How do we keep your personal data secure?**

To prevent your personal data from being disclosed, used, altered, accidentally lost or accessed in an unauthorized way, we have put in place appropriate security measures as prevention. We also limit access to your personal data to those, agents, contractors, employees and third parties who have a business requirement to know. They are subject to a duty of confidentiality and will only process according to our instructions.

### **How long do we retain your personal data?**

We will only retain your personal data for as long as necessary. This is to fulfil the purposes we collected it including for the purpose a satisfying any accounting, legal or reporting requirements. We consider the nature, sensitivity of the personal data, amount, the purposes for which we process your personal data, the potential risk of harm from an unauthorised use or disclosure, to determine the appropriate retention period. We have set out our retention Statement in the table above.

### **What are my legal rights?**

Unless subject to an exemption under the data protection laws, you have the following rights with respect to your personal data:

- The right to withdraw your consent to the processing at any time, where consent was the lawful basis for processing your data
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (this is known as Data Portability), where applicable 9i.e. where our processing is necessary for the performance of our contract with you, based on consent or where we process your data by automated means).
- The right to request your personal data is erased where it is no longer necessary to retain such data.
- The right to request that we correct any personal data if it is found to be out of date or inaccurate.
- The right to request a copy of the personal data which we hold about you.
- The right, where there is a dispute in relation to the processing or accuracy of your personal data, to request a restriction is placed on further processing.
- The right to object to our processing of personal data, direct marketing or processing of statistics, historical research or scientific purposes; where processing is based on legitimate interests or in the performance of a task in the exercise/public interest of official authority.

If you wish to exercise any of the rights set out above, please contact us by emailing us at [office@practices.co.uk](mailto:office@practices.co.uk) or telephone 0845 862 0372 for Subject Access Rights.

### **Do I need to pay a fee?**

To access your personal data or to exercise any of your other rights you will not have to pay a fee. However, we may charge a reasonable admin fee if your request is repetitive, excessive or unfounded. In these circumstances, we may refuse to comply with your request.

### **Do you need information from me?**

Yes. In order to confirm your identity and ensure your right to access your personal data or any of your other rights, we may need to request specific information from you. We would do this as a security measure in order to ensure that we do not disclose your personal data to any person who does not have the right to receive it. We may also contact you to request further information in order to speed up our response.

### **Is there a time limit to respond?**

We try to respond to all legitimate requests within one month. On occasion, it may take us longer than a month if you have made a number of requests or your request is complex. In that case, we will notify you and keep you up to date.

### **Will this notice change, and do I need to tell you if my personal data needs updating?**

This version was last updated on 01 June 2018 and historic versions can be obtained by contacting us. It is important that we hold your current and accurate personal data. Please keep us informed if your personal data changes during your relationship with us.

### **What if I have requests, queries or concerns?**

Contact us first by emailing us at [office@practices.co.uk](mailto:office@practices.co.uk) or telephone 0845 862 0372 to exercise all queries, complaints or relevant rights in relation to any data protection matter or this Statement between you and us.

If we do not resolve your complaint to your satisfaction you have the right to lodge a complaint with the [Information Commissioners Office](https://ico.org.uk/global/contact-us/email) on 0303 123 1113 or via email [https://ico.org.uk/global/contact-us/email/](https://ico.org.uk/global/contact-us/email) or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England, UK.