



# Devon Antenatal & First Aid Privacy Policy & Data Protection Act

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## Privacy Policy

Devon Antenatal & First Aid is committed to protecting your privacy. When you interact with us by phone, mail, in person or online, we sometimes receive personal information about you. This policy, tells you about how we collect, use and store your personal information. Please read this policy carefully to understand how we collect, use and store your personal data. If you have any queries about our privacy policy, please email:

Catherine Mchomvu at [enquiries@devonantenatal.co.uk](mailto:enquiries@devonantenatal.co.uk) or write to her:

Catherine Mchomvu

Devon Antenatal & First Aid Hub

C/o Barnstaple Baptist Church

Boutport Street

Barnstaple

EX31 1TD

What this policy takes into account Our privacy policy takes into account several legal instruments, including:

- the Data Protection Act 1998
- the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by The Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011
- Directive 2009/136/EC of 25 November 2009 ("The European Union Cookie Directive").

- General Data Protection Regulation (GDPR)

1. What information will we use? By participating in one of our courses or contacting us via our website, email or telephone in the United Kingdom we will collect and use information about you and any other delegates within your company (“your information”). This information includes your registration details, purchases and other information that you give us or that we collect, including about your use of internet connected devices. The information you provide when you register for our services is necessary so that you can enter into a contract with us to enable you to participate in our services. If you do not provide this information, you will not be able to participate in our services. When you interact with us, we may collect names, addresses, email addresses, financial information if booking a course, telephone numbers, dates of birth and sometimes medical information. We do not use cookies to collect this type of information. Where permitted to do so we may obtain information about you from third parties which do not participate in our services. This information may include transactional data, payment data, location data, social media identifiers, updates in your home address, demographic data, your interests and hobbies, intent data (for example, which websites you click through to and how long you spend reviewing certain products or pages), IP addresses, cookie and device identifiers. We monitor how people use our website so we can improve it. However, you can use our website anonymously without giving us any information and we won't know who you are. If you visit our site anonymously, we may still record information about the areas of the website you visit the amount of time you spend on the site whether you are new to the site, or have visited it before how you came to our website - for example, through an email link or a search engine the type of computer, browser, network location and internet connection you use. To understand how we may use such information please see “How will your information be used!”.

2. How will your information be used? We, Devon Antenatal & First Aid and other organisations and service providers that we work with or partner with from time to time (as described in more detail in the “Who will we share your information with?” section below), may use your information to:

- Operate the services supplied to you, for example to enable you to obtain the certificate, provide other course related services and ensure that the applicable terms and conditions are observed.
- Analyse how you use the services we provide and our marketing channels such as our website and our Facebook account.
- Assess the effectiveness of our marketing activities and the marketing activities we carry out on behalf of companies participating in our services.
- Understand your behaviour based on the information available to us and to send or show you information, offers, surveys and online advertisements for the products or services which we believe are most likely to interest you.
- Keep you updated, for example when your certificate is due to expire. One of the benefits of using our service is that we can show you offers or adverts that are relevant to you by various channels, including online. We decide what offers and adverts to show you or send you by taking into account: (i) the information you have provided to us as part of your sign up to a course, including, amongst other things, purchases you have made when using our website, (ii) information that we have collected about your online activities and internet connected devices through the use of cookies and similar technologies, and (iii) information obtained from third party sources, as identified in “What information will we use?”. We also work with companies participating in the services we provide to enable them to help the companies whose products they sell or advertise (we call them companies

whose products are sold or advertised “Brands” in this policy) to display the Brands’ online advertising to customers who we believe are likely to be interested in their products. Your information is not shared with the Brands, or third-party website which is displaying a Brand’s advertisement. If you do not want to receive advertisements that we believe are more relevant to you, please see the “Your choices and rights” section of this policy and the Cookie Policy. 3. When we can use your information We collect and use your information in the following situations:

- Where our use of your information is necessary for us to perform the contract or contracts that we have with you. These contracts include the terms and conditions of our services and any other agreements which we enter into with you from time to time
- Where our use of your information is for the purposes of our legitimate interests or legitimate interests of companies participating in our services to you and we have made sure that your information, and your rights in relation to that information, are protected. For example we may rely on this legal basis if we and/or the companies participating in our services to you use your information to understand and improve our (or their) products or services, to help find out what information, products and services are more like to interest you, to send or show you information, offers, and online advertisement for these products or services, or to ensure that the services we give you and its related services are delivered and used in accordance with the law and the terms and conditions that apply to them.
- Where we believe it is necessary to use your information to comply with a legal obligation to which we are subject, and
- Where we have your consent. We will consent to: (i) Collect technical information such as data from cookies and similar technologies as we describe in our Cookie Policy; (ii) Collect device identifiers from your devices, provided you have given consent to the website provider, your mobile provider, or via the device settings; (iii) Use information about your location that we get from these technologies and the website to show you advertisements and offers which we think you may be interested in, and (iv) Use your information for marketing to you by email, text message and other methods of electronic communication from time to time in accordance with your data choices. Where we rely on consent to use your information, you have the right to withdraw consent at any time. Please see the “Your choices and rights” section of this policy for more details. 4. The period for which we will keep your information<sup>[SEP]</sup> We will keep your information for as long as is necessary for us to fulfil the purposes that we describe in this policy. As a general rule, however, we will keep:
  - the information you provide when you register with our services, together with any updates you make to that information, for the duration of your usage of our services;
  - the information that we collect about you and your use of our services (including, for example, when and where you have used our services) for the duration of the usage of our services or, in some cases less time, based on the reason for holding such information and whether such information remains current, for example the cookies we use for third party advertising (as set out in the Cookie Policy) are held for no longer than 12 months If you do not use our services for a period of 36 months we may deem you to be inactive. Your information will be kept and securely stored anonymously for a further period of 12 months after you are deemed to be inactive, following which we will ensure that your personal data is no longer retained. 5. Who will we share your information with? We may share your information within the Devon Antenatal & First Aid Group and with the companies participating in our services and their group companies. We may also share your information with:

- other organisations and service providers (which includes the other members of the Devon Antenatal & First Aid Group) that we work with or partner with from time to time including, for example: third party websites, analytics providers and advertising and media companies to enable them to show you adverts or offers which may interest you, including online, and mailing houses so that we can send you information or offers in the post;
- our professional advisors;
- any law enforcement agency, court, regulator, government authority or other third party where we believe this is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights or the rights of any third party; and
- any third party that purchases, or to which we transfer, all or substantially all of our assets and business. Should such a sale or transfer occur, we will use reasonable efforts to try to ensure that the entity to which we transfer your information uses it in a manner that is consistent with this policy. We promise we'll never share your details with anyone else 6. Transferring your information internationally Your personal information may be transferred internationally. Sometimes we will need to transfer your information out of the United Kingdom, for example, we may outsource some of our IT services to India and to the USA. Countries to which we transfer information may have different standards to control how your information is used and protected and these standards may not be as strict as those in place in the United Kingdom. If we transfer your information to a country which does not have data protection laws which offer an adequate level of protection for your information, we will make sure that the organisation which receives your information is a participant in the Egress Switch Platform (for more information, please visit the Egress Switch website), put in place appropriate safeguards to protect your information, or otherwise ensure that we can transfer your information in a way that complies with data protection law (for example, in some circumstances we may ask for your explicit consent to make a transfer of your information). Where we put in place appropriate safeguards to protection information which we transfer, the safeguards may include securing additional legal agreements to protect your information. You can obtain a copy of these agreements by contacting the Data Protection Officer, Devon Antenatal & First Aid using the details below. 7. Your choices and rights You have a number of rights in relation to your information and can make a number of choices about how we collect and use it. For example, you can decide not to receive marketing material from us, tell us how you want to receive marketing communications from us, and object to some of the ways in which we use your information. Note that some of the choices or changes you make may impact our ability to maintain our services to you or provide you with offers or advertisements, and the services supplied to you may need to be stopped. We will notify you if such action is necessary. You can contact us to access and update the contact and personal details we hold about you;
- view your transaction history;
- opt-out of receiving marketing communications to your device and/or by telephone including calls to your mobile or other number, SMS, and email from us;
- opt-out of receiving postal marketing communications from us and companies participating in our services;
- find out how to opt out if you do not want your information to be shared (in the form of cookies or similar technologies) with third party websites that we may work with from time to time so that those third-party websites can show you adverts or offers that may interest you online. To find out more about how to control or refuse the use of cookies on our website (including the cookies that

we use to serve you adverts relevant to you on our website and elsewhere online and the cookies used to identify and link the devices you use online to you) See our Cookie Policy. You can contact us using the details below to:

- request access to your information
- ask that we update, complete or correct your information; • ask that we erase or restrict our use of your information;
- request that we provide your information to you in a commonly used electronic format and to have that information transmitted directly to another organisation (this is known as the right to 'data portability'); and/or
- object to our, or companies participating in our services, using your information in certain circumstances – for example, to see how you use our services, our website, and to understand your behaviour and identify and link the devices you use to you. If you are concerned about how your information is used, please contact us at FAO Data Protection Officer, Devon Antenatal & First Aid Devon Antenatal & first Aid Hub, C/o Barnstaple Baptist Church, Boutport street, Barnstaple EX311TD. Alternatively you have a right to complain to the Information Commissioner's Office. 8.. Get in touch by contacting the Data Protection Officer in writing at the above address, or you can contact the company director on 07966320081 to raise any questions or concerns. Our privacy policy may change from time to time, so please check this policy occasionally to see if we have included any updates or changes, and that you are happy with them.

Date Updated: 23/05/18

## Data Protection

To ensure that we comply with the General Data Protection Regulation (GDPR) and to make sure that your information is kept secure, we have registered with the ICO (Information Commissioners Office). For further information, click on the link below.

<https://ico.org.uk>

