# **CIBTAC Privacy Policy**

The Confederation of Beauty Therapy and Cosmetology Limited (CIBTAC) is a not for profit company, limited by guarantee and owned and managed by its members. Registered in England, No: 01293645 Registered Office: Ambrose House, Meteor Court, Barnett Way, Barnwood, Gloucester, GL4 3GG, UK

For the purposes of the GDPR, CIBTAC is the 'controller' and 'processor' of the personal data you provide to us

If you have any queries about this Policy, the way in which CIBTAC processes personal data, or about exercising any of your rights, please send an email to enquiries@cibtac.com or write to Data Protection, CIBTAC, CIBTAC Ltd, Ambrose House, Meteor Court, Barnett Way, Barnwood, Gloucester, GL4 3GG, UK

CIBTAC is committed to data security and the fair and transparent processing of personal data. This privacy policy (Policy) sets out how we will treat the personal data which you provide to us in compliance with applicable data protection law, in particular the General Data Protection Regulation (EU) 2016/679 (GDPR).

Please read this Policy carefully as it contains important information on who we are, how and why we collect, store, use and share personal data, your rights in relation to your personal data, how to contact us and supervisory authorities in the event that you would like to report a concern about the way in which we process your data.

CIBTAC owns and operates www.cibtac.com (Website). This Policy, together with our Website terms of use and any other documents referred to in them, sets out the basis on which CIBTAC processes personal data via our Website.

## What personal data do we collect?

We may collect and process personal data you provide to us if you:

- complete a form on our Website;
- enter into a contract with us to receive products and/or services,
- complete a survey;
- correspond with us by phone, e-mail, or in writing;
- report a problem;
- sign up to receive our communications;
- create an account with us;

### Information we collect about you

If you visit 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, login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;

information about your visit to our Website such as the products and/or services you searched for and view, 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.

We may also receive information about you if you use any of the other websites we operate or the other services we provide.

If you are a tutor, apprentice, or learner, we may also receive information about you from your centre, training provider, or employer when they register to receive products and/or services form us.

In certain limited cases, we may collect certain sensitive personal data from you - such as age, gender, ethnic origin, qualification details etc. However, we will only do so on the basis of your explicit consent.

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

When we ask you to supply us with personal data we will make it clear whether the personal data we are asking for must be supplied so that we can provide the products and services to you, or whether the supply of any personal data we ask for is optional.

Contract performance: we may use your personal data to fulfil a contract, or take steps linked to a contract:

- to provide the products and/or services to you;
- to communicate with you in relation to the provision of the contracted products and services;
- to provide you with administrative support such as account creation, security, and responding to issues; and
- provide you with industry information, surveys, information about our awards and events, offers and promotions, related to the products and/or services.

Legitimate interests: where this is necessary for purposes which are in our, or third parties, legitimate interests. These interests are:

- providing you with newsletters, surveys, information about our awards and events, offers, and promotions which may be of interest to you;
- communicating with you in relation to any issues, complaints, or disputes;
- improving the quality of experience when you interact with our products and/or services, including testing the performance and customer experience of our Website;
- performing analytics on sales/marketing data, determining the effectiveness of promotional campaigns.
- developing, improving, and delivering marketing and advertising for products and services
  offered

NOTE: you have the right to object to the processing of your personal data on the basis of legitimate interests as set out below, under the heading Your rights.

Where required by law: we may also process your personal data if required by law, including responding to requests by government or law enforcement authorities, or for the prevention of crime or fraud.

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

We may share your personal data with members of staff internally

We take all reasonable steps to ensure that our staff protect your personal data and are aware of their information security obligations. We limit access to your personal data to those who have a genuine business need to know it.

We may also share your personal data with trusted third parties including:

- legal and other professional advisers, consultants, and professional experts;
- service providers contracted to us in connection with provision of the products and services such as providers of IT services and customer relationship management services; and
- analytics and search engine providers that assist us in the improvement and optimisation of our Website.

We will ensure there is a contract in place with the categories of recipients listed above which include obligations in relation to the confidentiality, security, and lawful processing of any personal data shared with them.

Where a third party recipient is located outside the European Economic Area, we will ensure that the transfer of personal data will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission where the data protection authority does not believe that the third country has adequate data protection laws.

We will share personal data with law enforcement or other authorities if required by applicable law.

#### How long will we keep your personal data?

Where there is a contract between us, we will retain your personal data for the duration of the contract, and for minimum period of six years following its termination or expiry, to ensure we are able to comply with any contractual, legal, audit and other regulatory requirements, or any orders from competent courts or authorities.

Where you receive marketing communications from us, you may change your preferences or unsubscribe from marketing communications at any time by clicking the unsubscribe link in an email from us.

# Where do we store your personal data and how is it protected?

We store your personal data on our secure onsite server. We take reasonable steps to protect your personal data from loss or destruction. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Where you have a username or password (or other identification information) which enables you to access certain services or parts of our Website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, 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 your personal data transmitted to our Website; any transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access.

# Your rights

Under the GDPR, you have various rights with respect to our use of your personal data:

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request (or view them directly online through your own personal secure login on the website)
- require the organisation to change incorrect or incomplete data (or contact data and communication opt in options can be amended anytime personally online through your personal secure login)
- require the organisation to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing
- object to the processing of your data where the organisation is relying on its legitimate interests as the legal ground for processing; and
- ask the organisation to stop processing data for a period if data is inaccurate or there is a
  dispute about whether or not your interests override the organisation's legitimate grounds
  for processing data.

If you would like to exercise any of these rights, please contact us. You can make a subject access request by requesting and completing the organisation's Subject Access Request Form.

Please note that the GDPR sets out exceptions to these rights. If we are unable to comply with your request due to an exception we will explain this to you in our response.

#### Contact

If you have any queries about this Policy, the way in which CIBTAC processes personal data, or about exercising any of your rights, please send an email to enquiries@cibtac.com or write to Data Protection, CIBTAC Ltd, Ambrose House, Meteor Court, Barnett Way, Barnwood, Gloucester, GL4 3GG, UK

# Complaints

If you believe that your data protection rights may have been breached, and we have been unable to resolve your concern, you may lodge a complaint the applicable supervisory authority or to seek a remedy through the courts. Please visit https://ico.org.uk/concerns/ for more information on how to report a concern to the UK Information Commissioner's Office.

### **Changes to our Policy**

Any changes we may make to our Policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our Policy