

## UMD Professional Ltd Privacy Policy

Dated 30 April 2018

Date to be reviewed 30 April 2019

This privacy notice provides you with details of how we collect and process your personal data.

Fiona Stuart-Wilson is the data controller for UMD Professional Ltd responsible for your personal data, and Paul Archer is the Data Protection Officer who is responsible for privacy related matters. If you have any questions about this privacy notice, please contact the Data Protection Officer at [ilm@umdprofessional.co.uk](mailto:ilm@umdprofessional.co.uk)

The categories of data we process are:

Personal data for the purposes of staff and self-employed team member management

Personal data for the purposes of direct mail, email, text or marketing

The lawful basis of processing personal data such as name, address, email or phone number is:

Consent of the data subject

Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract.

The retention period for records relating to ILM management qualifications is 4 years. The retention period for staff records is 6 years. The retention periods for other personal data is 2 years after it was last processed.

You have the following personal data rights:

The right to be informed

The right of access

The right to rectification

The right to erasure (clinical records must be retained for a certain time period)

The right to restrict processing

The right to data portability

The right to object

Further details of these rights can be seen at the Information Commissioner's website

Comments, suggestions and complaints

Please contact Paul Archer at [ilm@umdprofessional.co.uk](mailto:ilm@umdprofessional.co.uk) if you have a comment, suggestion or a complaint about your data processing.

If you are unhappy with our response or if you need any advice you should contact the Information Commissioner's Office (ICO). Their telephone number is 0303 123 1113, you can also chat online with an advisor. The ICO can investigate your claim and take action against anyone who has misused personal data. You can also visit their website for information on how to make a data protection complaint.

## 2. WHAT DATA DO WE COLLECT ABOUT YOU

Personal data means any information capable of identifying an individual. It does not include anonymised data.

We may process certain types of personal data about you as follows:

Identity Data may include your first name, maiden name, last name, username, marital status, title, date of birth and gender.

Contact Data may include your billing address, home address, email address and telephone numbers.

Financial Data may include your bank account and payment card details.

Transaction Data may include details about payments between us and other details of purchases made by you.

Technical Data may include your login data, and internet protocol addresses

Profile Data may include your username and password, purchases or orders, your interests, preferences, feedback and survey responses.

Usage Data may include information about how you use our website, products and services.

Marketing and Communications Data may include your preferences in receiving marketing communications from us and our third parties and your communication preferences.

#### Sensitive Data

This may include data concerning health issues affecting learners.

Where we are required to collect personal data by law, or under the terms of the contract between us and you do not provide us with that data when requested, we may not be able to perform the contract (for example, to deliver services to you).

### 3. HOW WE COLLECT YOUR PERSONAL DATA

We collect data about you through a variety of different methods including:

Direct interactions: You may provide data by filling in forms on our site (or otherwise) or by communicating with us by post, phone, email or otherwise, including when you:  
order our products or services;  
subscribe to our service or publications;  
request resources or marketing be sent to you; or  
give us feedback.

Automated technologies or interactions: As you use our site, we may automatically collect Technical Data about your equipment, browsing actions and usage patterns. We collect this data by using cookies, server logs and similar technologies.

### 4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when legally permitted to do so. The most common uses of your personal data are:

Where we need to perform the contract between us.

Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

Where we need to comply with a legal or regulatory obligation.

#### Purposes for processing your personal data

We may process your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data.

To register you as a new client

For performance of a contract with you

To process and deliver our services to you including managing payments, fees and charges

To manage our relationship with you which will include:

To deliver relevant website content and advertisements to you and measure and understand the effectiveness of our advertising

To make suggestions and recommendations to you about goods or services that may be of interest to you

Marketing communications

You will receive marketing communications from us if you have:

requested information from us or purchased goods or services from us; or

if you provided us with your details and ticked the box at the point of entry of your details for us to send you marketing communications; and

in each case, you have not opted out of receiving that marketing.

We do not share data with any third parties for marketing purposes.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

## 5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for legitimate purposes:

ILM for processing of qualification registrations and certification

HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.

Banks, direct debit and credit card transaction companies

Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

## 6. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 7. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers.

In some circumstances you can ask us to delete your data. Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please email the DPO at [ilm@umdprofessional.co.uk](mailto:ilm@umdprofessional.co.uk).

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

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

## Cookies

### What are cookies

As is common practice with almost all professional websites, this site uses cookies, which are tiny files that are downloaded to your computer, to improve your experience. This page describes what information they gather, how we use it and why we sometimes need to store these cookies. We will also share how you can prevent these cookies from being stored however this may downgrade or 'break' certain elements of the site's functionality.

### How we use cookies

We use cookies for a variety of reasons detailed below. Unfortunately, in most cases, there are no industry standard options for disabling cookies without completely disabling the functionality and

features they add to this site. It is recommended that you leave on all cookies if you are not sure whether you need them or not, in case they are used to provide a service that you use.

#### Disabling cookies

You can prevent the setting of cookies by adjusting the settings on your browser (see your browser Help for how to do this). Be aware that disabling cookies will affect the functionality of this and many other websites that you visit. Disabling cookies will usually result in also disabling certain functionality and features of this site. Therefore, it is recommended that you do not disable cookies.

#### The cookies we set

In order to provide you with a good experience on this site, we provide the functionality to set your preferences for how this site runs when you use it. In order to remember your preferences, we need to set cookies so that this information can be called whenever you interact with a page which is affected by your preferences.

#### What are the different types of cookies?

Different cookies are used to perform different functions. We detail below our use of cookies. You do have choices about how cookies are used.

We use cookies that are essential and first party; they are set by the web server of the visited page and share the same domain. These cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as filling in forms.

You can set your browser to block or alert you about these cookies, but some parts of the site will not then work. These cookies do not store any personally identifiable information.

Session cookies and persistent cookies; our website is hosted on servers that use two different types of cookies. The first type is known as a 'session-based' cookie and is allocated to your computer only for the duration of your visit to our website. It helps you to move around the website faster. This cookie automatically expires when you close down your browser, or complete a task (such a form completion). The second type of cookie is known as a 'persistent' cookie. These cookies will remain on your computer for a period of time set for each cookie. These cookies allow us to collect data on behaviours such as how many times you visited a page.

#### How to refuse or opt out of cookies

Most browsers and websites automatically accept cookies but provide controls that allow you to block or delete them. This site has an "implied consent" policy for these cookies, which assume the user has set their cookies on their browser to active. A cookie policy banner is visible until the user acknowledges it and accepts the banner (they can also click on it to read more).

If you wish to block cookies from your browser software, please check the browser help menu for relevant instructions. Take care to ensure that you select the correct type and version of your browser software.

Unfortunately, if you choose to decline cookies, some of the interactive features and some functionality of our websites and our services may not be available to you. We advise regular users of our websites and services to accept cookies from us.