# **Privacy Policy**

The effective date of this privacy policy is May 25<sup>th</sup> 2018.

This privacy notice is in two parts.

Part 1: Under the EU General Data Protection Regulations (GDPR), we, the European Association for Body Psychotherapy [EABP], are required to update the data protection references in our communications with our members and, in the case of individual members, provide certain details regarding EABP and collection and use of your personal data. This is set out in more detail below.

Part 2: The second part sets out, in relation to information we collect from this website, the practices we follow to respect the privacy of all visitors.

## Part 1

The address of EABP is Tintorettostraat 29/1, 1077 RP Amsterdam, Netherlands. Our Data Protection Officer can be contacted at secretariat@eabp.org.

# What are your rights?

If at any point you believe the information we process on you is incorrect you can request to see this information and even have it corrected or deleted. If you wish to raise a complaint on how we have handled your personal data, you can contact our Data Protection Officer as above who will investigate the matter.

If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law, you can complain to the Information Commissioner's Office (ICO) in the Netherlands or the equivalent in the country where you reside.

Unless otherwise agreed with you, we will only collect basic personal data about you, which does not include any 'sensitive personal data'. This information does, however, include the likes of your name, work address, email address and job title.

A full list of your rights under GDPR is as follows:

- 1. The right to access the personal data we hold on you
- 2. The right to correct and update the personal data we hold on you
- 3. The right to have your personal data erased
- 4. The right to object to processing of your personal data
- 5. The right to data portability
- 6. The right to withdraw your consent to the processing at any time for any processing of personal data to which consent was sought.
- 7. The right to object to the processing of personal data where applicable.
- 8. The right to lodge a complaint with the Information Commissioners Office in the UK or the equivalent in the country where you reside.

### **Data Collection**

We need to know basic personal data in order to provide you with

- (a) Our marketing and informational communications, including our newsletters, and information about the services we can offer you and updates about our activities. For this purpose, we use Mailchimp. Mailchimp's Privacy Policy describes what personal data it collects and how it uses it. You may contact Mailchimp directly to request access to information that Mailchimp may hold about you.
- (b) **Our membership services,** and to claim our right to be paid in return for our services, under our contract we have with you. If you do not provide this information then we will be unable to provide the services you have requested.

We will not collect any personal data from you that we do not need in order to provide our marketing and informational communications as referred to above or to provide our services we have agreed to provide you with.

### Use of Data

Except in relation to our transfer of your personal data to Mailchimp as described above for the purposes of providing marketing and informational communications, all the personal data we hold about you will be processed by us in the Netherlands and no third parties will have access to your personal data unless there is a legal obligation for us to provide them with this. We have set out below the legal bases for the Firm to process your data.

Some of our processing is necessary for compliance with legal obligations. For example, we may be obliged to report certain matters to law enforcement agencies.

We may also process data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract. An example of this would be processing your data in connection with providing you with membership services.

We will also communicate with you information about other services we can offer you and update you about our activities.

Where your information is used other than in accordance with one of these uses, we will first obtain your consent to that use.

We take all reasonable steps to ensure that your personal data is processed securely and more information on this can be found on our website.

# How long we keep it

We will generally keep your personal data for a minimum of 6 years after which time it will be destroyed if it is no longer required for the lawful purpose(s) for which it was obtained. If you consent to marketing, any information we use for this purpose will be kept with us until you notify us that you no longer wish to receive this information.

# Sharing your personal data

Your personal data will only be shared with third parties including other data controllers where it is necessary for the performance of the data controllers' tasks or where you first give us your

prior consent. It is likely that we will need to share your data with our agents, suppliers and contractors. For example, we may ask a supplier to send out newsletters on our behalf (for example Mailchimp as referred to above under the heading **Data Collection** above, or to maintain our database software, or to provide us with administration, IT and other related services:

Any personal data transferred to countries or territories outside the European Union will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the European Union.

### Part 2

At EABP we have focused on implementing fair information practices that are designed to protect your privacy. If you have questions or you do not feel that your concerns have been addressed in our privacy statement, or you just want to talk with us, feel free to contact us by email at <a href="https://www.eabp.org/contact.php">www.eabp.org/contact.php</a>.

### **Data Collection**

We collect personally identifiable information that is voluntarily provided by visitors to this Website (User Data). The User Data that EABP receives from Website visitors includes name, title, address, email address, screen name, telephone and fax numbers, and any other information provided by visitors in email messages or attachments thereto.

Typically, User Data is collected in order to assist visitors to:

- register for certain areas of the Website
- distribute requested reference materials
- contact us for further information
- register for events, courses and conferences.

It is EABP's policy to limit the information collected to only the minimum information required to complete a Website visitor's request.

EABP's intention is not to seek any sensitive information through our Website unless legally required. Sensitive information includes a number of types of data relating to race or ethnic origin, political opinions, religious or other similar beliefs, trade union membership, physical or mental health, sexual life, or criminal record.

### Use of User Data

User Data obtained by the Website is used for internal business purposes of EABP and in connection with a visitor's request. This data is not shared with others for unrelated purposes unless stated in this Privacy Policy or otherwise communicated to the Website visitor.

EABP makes every practical effort to avoid excessive or irrelevant collection of data. If a visitor believes the Website has collected excessive information, we encourage the visitor to contact us at <a href="https://www.eabp.org/contact.php">www.eabp.org/contact.php</a> to raise any concerns.

Except for instances where visitors explicitly choose to receive specific EABP marketing or other informational materials, EABP will not use personal data collected from our Website to distribute marketing or informational materials.

#### Third Parties

It is EABP's policy only to disclose User Data to third parties under the following circumstances:

- when explicitly requested by the visitor
- when requested to deliver marketing or other informational materials to the visitor which we will do using Mailchimp who send out such materials on our behalf in accordance with the provisions of the Data Collection and Sharing your Personal Data sections in Part 1 of this Privacy Policy above
- when required to deliver publications or reference materials requested by the visitor
- when required to facilitate conferences or events hosted by a third party
- when required to meet any other request of a visitor.

Categories of third parties that EABP may share personally identifiable information with include federal, state, and local government entities and Mailchimp who send out marketing and other informational materials on our behalf in accordance with the provisions of the **Data Collection** and **Sharing your Personal Data** sections in **Part 1** of this Privacy Policy above. This Website does not collect or compile personally identifying information for dissemination or sale to outside parties for consumer marketing purposes, or host mailings on behalf of third parties.

#### Use of Cookies

A cookie is a tiny element of data that a website can send to a visitor's computer's browser so that this computer will be recognised by the Website on their return. Cookies allow our web server to recognise a computer on connection to the Website, which in turn allows the server to make downloading of pages faster than on first viewing. In addition, cookies may also be used by us to establish statistics about the use of the Website by Internet users by gathering and analysing data such as: most visited pages, time spent by users on each page, site performance, etc. By collecting and using such data, we hope to improve the quality of the Website.

The data collected by our servers and/or through cookies that may be placed on your computer will not be kept for longer than is necessary to fulfil the purposes mentioned above. In any event, such information may not be kept for longer than one year.

Navigation data about site viewers is automatically collected by our servers. If you do not wish to have this navigation data collected, we recommend that you do not use the Website. A visitor can also set their browser to block the recording of cookies on their hard drive to minimise the amount of data that may be collected about your navigating on the Website. The browser on a computer can be set to notify the user when a cookie is being recorded on their computer's hard drive. Most browsers can also be set to keep cookies from being recorded on their computer. However, for optimal use of the Website, we recommend that visitors do not block the recording of cookies on their computer.

EABP's servers and computer systems are protected from outside intrusions. As a result, all data that may be collected about Website viewers through the use of cookies will be protected from unauthorised access.

Cookies used on the Website are only active for the duration of the visit. Cookies used on this site are not stored on visitor's computer once you have closed your web browser. Information generated by the use of cookies may be compiled into an aggregate form so that no individual can be identified.

We may at some stage use cookies to identify users when they visit the Website to use personalised services. In such circumstances these cookies may be kept on the hard drive of their computer following closure of the web browser. Cookies used in connection with such services enable us to build up a profile of our users and to develop personalised versions of the Website.

For more information about cookies, please see the Information Commissioner's website home page or the Interactive Advertising Bureau.

A visitor may choose to not receive a cookie file by enabling your web browser to refuse cookies. The procedure for refusal of cookies may vary for different software products. Please check with your internet browser software help or your software supplier if you wish to refuse cookies.

# Transfer of User Data outside the User Jurisdiction

The Internet is a global environment. In order to provide the Website we may need to transfer User Data to locations outside the jurisdiction in which a visitor is viewing the Website (the User Jurisdiction) and process User Data outside the User Jurisdiction. If the User Jurisdiction is within the European Economic Area (the EEA) please note that such transfers and processing of personal data may be in locations outside the EEA. Any data sent or uploaded by users may be accessible in jurisdictions outside the User Jurisdiction (including outside the EEA). The level of data protection offered in such jurisdictions may be less than that offered within the User Jurisdiction or (as the case may be) within the EEA.

By continuing to use the Website and by providing any personal data (including sensitive personal data) to us via the Website or email addresses provided on the Website, visitors are consenting to such transfers, provided that they are in accordance with the purposes set out above and elsewhere in the Privacy Policy. Please do not send us any personal data if you do not consent to the transfer of this information to locations outside the User Jurisdiction (including, if applicable, outside the EEA.

# Third-party Links

There are several places throughout this Website that may link to other websites that do not operate under EABP's privacy practices. When visitors link to other Websites, EABP's privacy practices no longer apply. We encourage visitors to review each site's privacy policy before disclosing any personally identifiable information.

### Choices

As a policy, visitors are not required to register to gain access to this Website. Personally identifiable information provided to EABP through this Website is provided voluntarily by visitors. Should visitors subsequently choose to unsubscribe from mailing lists or any registrations, we will provide instructions on the appropriate Website area or in communications to our visitors; or a visitor may contact EABP at www.eabp.org/contact.php.

### Access

Each visitor has the right of access to personal data they have submitted through this Website.

User updates of information should be handled by going back through the registration process. Enquiries about the accuracy of identifying information previously submitted, or requests to have information removed, should be directed to <a href="https://www.eabp.org/contact.php">www.eabp.org/contact.php</a>.

# Security

Only authorised personnel are provided access to personally-identifiable information and these persons are required to agree to ensure confidentiality of this information.

### **Modifications**

EABP reserves the right to modify or amend this statement at any time. The effective date will be displayed at the beginning of this statement. To keep visitors informed, EABP will notify users of material changes to our Privacy Statement by prominently identifying a link on our website home page to the updated Privacy Policy for a period of not less than two weeks.

#### Consent

By continuing to use the Website and by providing any personal data (including sensitive personal data) to us via the Website or email addresses provided on the Website, visitors are consenting to our use of your personal data as set out in this Privacy Policy. Please do not send us any personal data if you do not want that information to be used by us in this manner.

# Copyright

All documents, programmes, publications, designs, products, processes, software, technology, information, and ideas (Content) provided by or described in this Website are the property of EABP and/or its affiliates or suppliers and are protected by U.K. and international copyright laws and other intellectual property laws, unless stated otherwise. The Content is provided to users of this Website for informational purposes only. Except as expressly permitted below or by applicable law, users may not copy (except to the extent required in order to use the Website in accordance with the Legal Notice), store in any medium (including in any other website), distribute, transmit, re-transmit, broadcast, modify, or otherwise make available or communicate to the public any part of the Website or systematically extract material from the Website or any document available through it or in any other way exploit commercially all or any part of the Website or any document available through it without our prior written permission.

Users may print or save one copy of any page of the Website and documents available through it (other than documents provided by third parties) for their own personal use.