

School of Natural Therapies - Privacy Statement (Reviewed September 2020)

The School of Natural Therapies (SNT) is committed to protecting the privacy of its learners and working partners, to provide a safe online experience in respect of the use and storage of personal data.

This Statement of Privacy explains how we use the **personal data** you provide in compliance with UK data protection law and the General Data Protection Regulation EU 2016/679 (GDPR).

For the purposes of the GDPR, SNT is the 'controller' of the personal data you provide to us.

What is personal data?

Personal data is information relating to an identified or identifiable natural person, such as name, age, address, date of birth, gender and contact details.

Personal data may contain information that is known as 'sensitive' data. This may be information relating to an individual's health, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic and biometric data, or data relating to or sexual orientation. Data relating to criminal convictions and offences is also considered sensitive data.

Who do we process personal data about?

As a data controller, we process personal data about our current learners, potential learners, third party business contacts, awarding and professional associations, tutors and learning centre staff.

Why do we need to process personal data?

We only process personal data where this is necessary for the purposes of fulfilling a service you have contracted to receive; this will include: -

- Establishing or negotiating course bookings, to provide the services you have requested in respect of Certificate, Diploma and short courses of learning with SNT.
- Promoting our own goods and services, such as our newsletter database.
- Managing payment and account records for our learners, service providers and business contracts.

- If required by law, including responding to law enforcement authorities and competent bodies to prevent or detect crime, fraud and money laundering – this also extends to government track and trace obligations relating to the Coronavirus Act 2020, where legally, SNT must provide relevant information to these agencies.

What information do we collect about you?

We collect information about you when you apply for one of our courses via our website, or if you make a booking with us using telephone communication or email. We also collect information when you voluntarily complete course satisfaction surveys or provide feedback.

Website usage information is collected using cookies.

Personal data we collect will include: -

- Name
- Date of birth
- Gender
- Address
- Email address
- Telephone number
- Business name
- Payment information – payment card details are not stored on our systems, but you may pay for one of our courses using PayPal, Bank Transfer, Credit/Debit Card.
- Special categories of personal data such as health.

If you object to the collection, sharing and use of your personal data we may be unable to provide you with our products and services.

Use of your Personal Information

SNT uses your personal information to maintain and monitor: -

Learners

- Course progress – examples of this will include assignments, case study work, exam results
- Payment information, in respect of course and any examination fees
- General course related help and support communications.
- Newsletters, promotional subject matter and service updates relating to the supply of our courses and course materials.

Service Providers and Business Contacts/Contractors

- Establishment and delivery of products and services that SNT has contracted to purchase, or supply; this will include fulfilment of our own record keeping and regulatory reporting obligations.
- Payment transactions for goods and services we have contracted to purchase, such as replacement qualification certificates or badges.

In general

- Respond to requests to be contacted, queries, which include telephone, email or written communications.
- Resolution of any complaints or disputes

Sharing Personal Information

SNT does not sell, rent, or lease its student, customer lists and business contacts data to any third parties.

SNT may share data with trusted partners including: -

- Legal, government and regulatory bodies, advisers, consultants and professional experts.
- When we are required to do so by law or similar obligation placed upon SNT.
- Postal and delivery service providers, who deliver certificates and any other related learning material.

Special category (sensitive) personal data

SNT may be obligated to collect and process special category data, only where necessary.

The special category data we use is limited to:

- Evidence of physical or mental health or condition required to provide confirm eligibility for special learner adjustments. This may include evidence of your condition or needs such as a medical report, details of your needs relating to a disability, or learning difficulties. SNT will not process this information for any other purpose. You have a right to withdraw your consent for processing this special category information at any time except where the processing relates to an overriding legal or regulatory obligation placed upon SNT. Withdrawing consent for processing medical data may result in the withdrawal or refusal for learning support arrangements.
- SNT may collect and process information such as race, religion and ethnicity where we are legally required to report on statistics relating to equal opportunities, discrimination and diversity.
- SNT does not include special category personal information in relation to any automated processing or profiling activities.

Marketing

Where you have given your express consent to receive marketing communications, we may use your personal data to send you newsletters – this will usually be email communication, but is not limited to other forms of communication, such as telephone calls if absolutely necessary, or where other forms of contact have failed.

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

How long do we retain your personal data?

We will retain your personal data for the duration of any contract between us, and for a period of seven years following its termination or expiry, to ensure we are able to comply with any contractual, legal, audit and other regulatory requirements.

Security of your Personal Information

SNT secures your personal information from unauthorised access, use or disclosure, by adopting recognised best practice standards and techniques to manage the security of your personal information throughout its lifetime. This extends from initial creation of a record to its destruction. We have robust processes in place to deal with any suspected security incidents that include notifying you and any regulatory bodies where we are legally required to do so.

Our computer servers and applications are password protected and we operate in a controlled, secure environment, protected from unauthorised access, use, disclosure, damage, or destruction.

When personal information (such as a credit card number) is transmitted to PayPal, it is protected through the use of encryption. PayPal have their own unique Privacy Statement, which can be accessed by using the following link: -

<https://www.paypal.com/uk/webapps/mpp/ua/privacy-full>

Where you create an account to use our online booking services, you are responsible for keeping your password confidential. We advise you not to share your password or use a password you commonly use on other websites as the transmission of information over the internet is not guaranteed to be secure.

Your Rights

Under the GDPR, and UK data protection law, you have specific rights over the processing of your personal data. These include:

1. A general right to be informed about the processing of your personal data
2. A general right to have your information processed securely
3. A right to request access (e.g. receive a copy of the personal data SNT holds about you).
4. A right to have inaccurate personal data corrected (rectification).
5. A right to be informed about how long your personal information will be retained.
6. A right to request erasure of your personal data if SNT has no legal, statutory or regulatory reason for processing it.
7. A right to restrict the processing of your personal information causing, or likely to result in harm or distress.
8. A right to portability in certain circumstances (i.e. to have your personal data provided in machine readable format to another organisation without constraint)
9. A right to object to the direct marketing material.
10. A right to have any automated processing and the logic used explained to you.
11. A right to complain to the UK data protection supervisory authority (the UK Information Commissioner if you believe your rights have been breached and SNT have been unable to resolve the issue, and a further right to obtain judicial remedy through the courts if your complaint is upheld.

For more information in how to make a formal complaint to the regulator, visit: - www.ico.gov.uk

If you would like to exercise any of the rights listed above, please write to the SNT Data Protection Officer at the Contact Information section below.

Changes to this Statement

SNT will occasionally update this Statement of Privacy to reflect company and customer feedback.

Contact Information

SNT welcomes your comments regarding this Statement of Privacy. If you believe that SNT has not adhered to this Statement, or have any concerns about how we process your personal data please contact us at: -

Data Controller - School of Natural Therapies

Unit 5b
Clapham North Art Centre
26–32 Voltaire Road
London
SW4 6DH

Tel: - 0203 544 6544

Email: - info@schoolofnaturaltherapies.com