

CISRS Privacy Notice

Introduction

Welcome to the CISRS privacy notice.

CISRS respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you. Please use the Glossary in item 10 to understand the meaning of some of the terms used in this privacy notice.

This privacy notice covers the following content:

- 1. IMPORTANT INFORMATION AND WHO WE ARE**
- 2. THE DATA WE COLLECT ABOUT YOU**
- 3. HOW IS YOUR PERSONAL DATA COLLECTED**
- 4. HOW WE USE YOUR PERSONAL DATA**
- 5. DISCLOSURES OF YOUR PERSONAL DATA**
- 6. INTERNATIONAL TRANSFERS**
- 7. DATA SECURITY**
- 8. DATA RETENTION**
- 9. YOUR LEGAL RIGHTS**
- 10. GLOSSARY**

1. Important Information and Who We Are

Purpose of this privacy notice

This privacy notice aims to give you information on how CISRS collects and processes your personal data, including any data you may provide through card applications, appeals, training queries.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Data Controller / Processor

CISRS is the controller and may at times be the processor and responsible for your personal data. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on [08.03.24].

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Links to third-party websites

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** including first name, last name, title, date of birth and NI Number.
- **Contact Data** including address, email address and telephone numbers.
- **Qualification Data** including records of grades and levels (as applicable) of professional exams, tests, and professional courses you may have taken and all relevant dates of such examinations and/or tests and courses.
- **Technical Data** including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political

opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with an CISRS card. In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity and Contact data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - Apply for a CISRS Card;
 - Submit an appeal;
 - Submit a query about your card status / training;
 - Give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy for further details.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract for the delivery of services we are about to enter into or have entered into with you.
- 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.

Please refer to the Glossary to find out more about the types of lawful basis that we will rely on to process your personal data.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our Legitimate Interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of Legitimate Interest
To register you on the CISRS database	(a) Identity (b) Contact	Performance of a Contract with you
To deal with appeals/queries	(a) Identity (b) Contact	(a) Performance of a Contract with you (b) Necessary for our Legitimate Interests (to deal with customer enquiries effectively)
To process payments for services we provide to you, including: (a) Managing payments, fees and charges (b) Collecting and recovering money owed to us or you	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a Contract with you (b) Necessary for our Legitimate Interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact	(a) Performance of a Contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our Legitimate Interests (to keep our records updated)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for your Legitimate Interests (to define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To validate the information you have provided to us to confirm that you have achieved required professional qualifications	(a) Qualification data (b) Identity	(a) Necessary for our Legitimate Interests (to ensure that you have obtained all required professional qualifications) (b) Performance of a Contract (c) Necessary to comply with a legal obligation

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside of CISRS for marketing purposes.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see <http://cisrs.org.uk/cookies-policy/>

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 an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We use third party service providers from time to time to help us administer certain activities and services, including to assist us in the production of our cards, and we currently use NOCN Job Cards as our card production service provider. We may share personal information about you with third party service providers solely for the purpose of enabling them to perform services on our behalf and they will operate only in accordance with our instructions.

We may also disclose your personal data to other third parties including:-

- Professional advisers including lawyers, bankers, auditors and insurers-based England or Scotland who provide consultancy, banking, legal, insurance and accounting services; and
- Health and Safety Executive, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.

6. International transfers

We do not transfer your personal data outside the European Economic Area unless the countries comply to the GDPR

7. 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. 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.

8. Data retention

How long will you use my personal data for?

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.

For information about retention periods, please contact laura.weekes@cisrs.org.uk

In some circumstances you can ask us to delete your data: see **Request erasure** below for further information.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a Legitimate Interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-

readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact laura.weekes@cisrs.org.uk

No fee usually required

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.

What we may need from you

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.

Time limit to respond

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.

10. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of your and or our business in conducting and managing our business to enable us to give you the best service and the best and most up to date training information. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our Legitimate Interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our Legitimate Interests against any potential impact on you in respect of specific activities by contacting laura.weekes@cisrs.org.uk

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.