



# Patient Information Forum

*For everyone involved in health information and support*

[www.pifonline.org.uk](http://www.pifonline.org.uk)

## PIF Privacy Policy

The Patient Information Forum (PIF) is the UK membership organisation and network for people working in, and involved with, healthcare information and support. PIF is an independent, not-for-profit organisation.

### 1. What this Privacy Policy covers

PIF is committed to protecting your privacy in accordance with our obligations under data protection legislation. The current data protection law is found in the Data Protection Act 1998 but with effect from 25th May 2018, the main data protection law will be the General Data Protection Regulation as supplemented by the Data Protection Act 2018 and related laws.

This privacy policy explains what information PIF collects about you through your use of our website [www.pifonline.org.uk](http://www.pifonline.org.uk), including any information you may provide through our website when you register for membership, or an event, sign up to our newsletter or make an email enquiry.

**The Patient Information Forum (PIF)** is the data controller and we are responsible for your personal data (referred to as “we”, “us” or “our” in this Privacy Policy). By providing us with your data, you warrant to us that you are over 13 years of age.

PIF promises to respect any personal data you share with us, or which we obtain from other organisations and keep it safe. We aim to be clear when we collect your data and will not do anything you would not reasonably expect.

If you have any queries regarding this Privacy Policy please contact PIF’s Data Protection Officer, Sarah Greening on: [sarah.greening@pifonline.org.uk](mailto:sarah.greening@pifonline.org.uk)

### 2. How do we collect your information?

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

#### 2.1 Direct interactions:

You may provide data by filling in forms on our site or by communicating with us by post, phone, email or otherwise, including when you:

- register for membership or an event;
- create an account on our website;
- subscribe to a service or publications;
- make a payment;
- request resources or marketing be sent to you;
- enter a competition, prize draw, promotion or survey; or

- give us feedback.

## 2.2 Information collected about you automatically:

As you use our website, 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.

**Cookies:** We use 'cookies' to enhance your experience on our website. When you are accessing our website, your device may provide us with information about the device you're using. This could include the type of device and operating system you are using. Your device manufacturer or operating system provider will be able to provide you with more details about the information your device makes available to us.

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 our website may become inaccessible or not function properly.

**Google Analytics:** We use Google Analytics to help us understand how visitors are using and engaging with our website. This allows us to make improvements to our web services and your online experience.

The Google Analytics tracking tool uses a number of cookies to collect information and report website usage statistics and does so without personally identifying individual visitors to Google or PIF.

The information generated by the cookie about your use of PIF's website will be transmitted and stored by Google on servers in the United States. For more information about Google's privacy policy on Google Analytics, please see [www.google.com/analytics/learn/privacy.html](http://www.google.com/analytics/learn/privacy.html).

When using any of these tracking tools PIF does not identify users or facilitate the merging of personally identifiable information with non-personally identifiable information collected.

## 2.3 Third parties or publicly available sources:

We may receive personal data about you from various third parties and public sources, for example:

- Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as **WorldPay, PayPal**.

## 3. What information do we collect and how do we use it?

The type of personal information we will collect about you will depend on the purpose for collecting the information, but may include any of the following:

- **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, delivery 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, internet protocol addresses, browser type and version, browser plug-in types and versions, time zone setting and location, operating system and platform and other technology on the devices you use to access this website.

- **Profile Data** may include your username and password, purchases or orders, your 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.

We do not collect any sensitive data about you.

### 3.1 What will we use your information for?

Set out below is a description of the ways we intend to use your personal data and the legal grounds on which we will process such data. We have also explained what our legitimate interests are where relevant.

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 email us at [sarah.greening@pifonline.org.uk](mailto:sarah.greening@pifonline.org.uk) 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
To register you as a member	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your membership or event registration including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests to recover debts owed to us
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(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 and to study how customers use our products/services
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests to study how customers use our products/services, to develop them and grow our business
To administer and protect our	(a) Identity	(a) Necessary for our legitimate interests for

business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(b) Contact (c) Technical	running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise  (b) Necessary to comply with a legal obligation
To deliver relevant content and advertisements to you and measure and understand the effectiveness of our advertising	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy
To make suggestions and recommendations to you about products or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests to develop our products/services and grow our business

### 3.2 Marketing communications

We will only contact you by email or text message if you actively consent to this, unless we believe there is a legitimate interest to contact you. By consenting to PIF emails or opting in to email communications, you grant us permission to use your email address to send you email marketing communication. At any stage you may choose to opt out of such communications.

You will receive marketing communications from us if you have:

- (i) requested information from us or registered for services from us; or
- (ii) 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
- (iii) in each case, you have not opted out of receiving that marketing.

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes. You can ask us or third parties to stop sending you marketing messages at any time by emailing us at [sarah.greening@pifonline.org.uk](mailto:sarah.greening@pifonline.org.uk) at any time.

Where you opt out of receiving our marketing communications, this will not apply to personal data

provided to us as a result of a product/service purchase, registration, product/service experience or other transactions.

### **3.3 Your choice**

You always have a choice as to whether and how you want to receive communications about our work, products and services and ways you can get involved. If you do not want us to use your contact details to contact you in the future you can opt out of this.

If you ever want to change your contact preferences, or opt out of communications, you can do this at any time by contacting [sarah.greening@pifonline.org.uk](mailto:sarah.greening@pifonline.org.uk).

### **3.4 Legal basis for processing your personal data**

In some circumstances we will collect and process your personal information using the legitimate interest legal processing basis.

Sometimes, we will need to process your data as it is part of a contract which you have entered into. For example, if you have booked an event, then we will need to contact you and take payment to enable us to provide the relevant services under the agreement with you.

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 you wish to find out more about how the processing for the new purpose is compatible with the original purpose, please email us at [sarah.greening@pifonline.org.uk](mailto:sarah.greening@pifonline.org.uk).

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 for processing this data.

### **3.5 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, plus the current accounting year, after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data. However, we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

### **3.6 Image rights**

When you are at an event your photograph may be taken. If you consent to having your photo taken and used for marketing or publicity purposes we may hold your name and image on file for future re-use. You can ask for your image to be deleted at any time.

## **4. How do we keep your personal information secure?**

We have put in place appropriate security measures to protect your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. 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.

#### **4.1 Third parties**

PIF will not sell your data. We will not share your data for marketing purposes unless you have actively consented to this. However, in some circumstances we may need to share your details with a third party for processing. This could be if we run an event in partnership with another organisation and they need your details in order to fulfil your registration e.g. to produce your name badge. We carry out thorough checks on any companies we work with to ensure that they process your information in line with our expectations.

Third parties might include:

- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- 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.

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.

Some of our service providers, for example, Mailchimp, run their operations outside the European Economic Area (EEA). Although they may not be subject to same data protection laws as companies based in the UK, we do our best to ensure a similar degree of security of data in accordance with UK data protection law. By submitting your personal information to us you agree to this transfer, storing or processing at a location outside the EEA.

If requested we may need to supply your information to the police, regulatory bodies or legal advisors.

### **5. Your right to your personal information**

Under General Data Protection Regulation (GDPR) you have 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.
- Have the 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 us at [sarah.greening@pifonline.org.uk](mailto:sarah.greening@pifonline.org.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.

## **6. Raising Queries or Concerns**

If you have any questions, comments, or concerns about data protection at PIF please contact us:

Full name of legal entity: **The Patient Information Forum (PIF) Ltd**

Name or title of Data Protection Officer: **Sarah Greening, Membership & Communications Officer**

Email address: [sarah.greening@pifonline.org.uk](mailto:sarah.greening@pifonline.org.uk)

Correspondence address: Patient Information Forum, **483 Green Lanes, London N13 4BS**

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at [sarah.greening@pifonline.org.uk](mailto:sarah.greening@pifonline.org.uk)