



The CSP Charitable Trust  
Registered Charity No. 279882

## **THE CHARTERED SOCIETY OF PHYSIOTHERAPY CHARITABLE TRUST (CSPCT)**

### CONTENTS OF PRIVACY NOTICE

#### **1) Introduction**

This Privacy Notice explains in detail the types of data we may collect about you when you interact with us. It also explains how we will store and handle that data, and keep it safe.

We know that there's a lot of information here, but we want you to be fully informed about your rights, and how the Chartered Society of Physiotherapy Charitable Trust (CSPCT) uses your data; for example we will explain things such as our application reviewing procedure.

We hope the following sections will answer any questions you have but if not, please do get in touch with us.

#### **2) What is the CSPCT?**

The CSPCT is an independent, registered charitable organisation in the UK. It supports physiotherapy education and research through annual awards to members, and further supports the development of professional development activities through the ad-hoc funding it provides.

#### **3) Explaining the legal bases we rely on for our business**

The law on data protection sets out the reasons we may collect and process your personal data. We use the following in our business:

- *Consent*

In specific situations, we can collect and process your data with your permission. For example, when we are processing your application for CSPCT funding.



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- *Contractual obligations*

In certain circumstances, we need your personal details to comply with a contractual obligation we have with you.

- *Legal compliance*

If the law requires us to, we may need to collect and process your data.

- *Legitimate interests.*

In specific situations, we require your data to undertake our legitimate business interests of running our charity in a way which might reasonably be expected, and which does not materially impact your rights, freedom or interests.

#### **4) When do we collect and/or use your personal data?**

When you:

- Visit the CSPCT pages of the Chartered Society of Physiotherapy (CSP) website
- Engage with us on our social media platforms, virtual learning environments and other web portals, including iCSP, the CSP's e-portfolio and Researchfish
- Ask us to email you information about a service or funding we provide, including our research and educational awards and any events we run
- Comment on or review our products and services
- Book any kind of event with us
- Choose to complete any surveys we send you. (*We may use third parties to do this*)
- Fill in any forms for example, travel booking or expense claims
- Submit an invoice to us
- Provide bank details to us
- Ask us to book travel and accommodation for you to attend a CSPCT event
- Sign up to use any iCSP networks
- Apply for CSPCT funding



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- Receive CSPCT funding and/or awards
- Join a CSPCT private network on iCSP
- Apply to join the CSPCT or its panel, the Educational Awards Panel (EAP) and the Scientific Panel (SP)
- Join the CSPCT, EAP or SP
- Apply to be a peer reviewer
- Review our applications as an external reviewer
- Create a Virtual Learning Environment (VLE) or e-Portfolio account
- Submit an abstract for PTUK, where this relates to funding you have received from the CSPCT
- Access and/or use any of our online resources
- Access the CSP/CSPCT business premises at any of our sites (CCTV)
- Use CSP/CSPCT provided and maintained IT equipment (device monitoring)
- Contact us by any means with an enquiry
- Access and/or use any of our online resources
- Give a third party permission to share with us the information they hold about you

We use Cookies on our website – a cookie is a small text file that we transfer to your computer that helps our website to remember you. Cookies help to improve your experience of using our website by making the interaction faster and easier e.g. by automatically filling in your contact details in text fields.

Cookies also capture your IP Address which gives us information about the device or operating system you're using. This helps us to improve how our website operates which, in turn, means that we can deliver a better online experience to our supporters.

## **5) What sort of personal data do we collect?**

- Your name, address, e-mail address, phone numbers
- Bank account and invoicing details
- Membership number and profile, your workplace, speciality details, HCPC number (registered members only), iCSP networks



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- Your job title, job role, profession, employer, region of work ( *Dynamics*)
- Identity documents to verify your name and other personal data
- Details of your interactions with us. For example, telephone conversations with the CSP's Enquiries Team may be recorded. We may also make notes of our conversations with you, as well as record details of any queries, complaints or comments you make
- Details of your visits to our website
- Information included within documents of evidence you provide
- Information included within documents provided when applying to join the Trust and/or its Panels
- Details of any medical and accessibility requirements, when registering for and/or attending any of our events
- When you apply for a voluntary position with us we collect your name, address, email address phone numbers, employment history, qualifications/education and for equal opportunities monitoring purposes only, we may collect information on age, gender, ethnicity, region or belief, sexual orientation and disability. It is not compulsory to provide equal opportunities information

## **6) How and why do we use the personal data you provide to us?**

We use this information in order to:

- Comply with contractual and legal obligations we have with you and/or Third Parties, including evaluation of any award that you receive
- Provide our legitimate business as a Charitable Trust, including processing funding applications and recruitment documents. If you choose not to share your personal data with us, or refuse certain contact permissions, we might not be able to process your application
- Prevent and detect financial and /or identity fraud
- Set up your panel membership with us
- Respond to your queries. Handling the information you sent enables us to respond. We may also keep a record of this to inform any future communication with us and to demonstrate how we communicated with you throughout. We do this on the basis of our contractual obligations to you, our legal obligations and our legitimate interests in providing you with the



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best service, and understanding how we can improve our service based on your experience.

- Send you survey and feedback requests to help improve our services. These messages will not include any promotional content and do not require prior consent when sent by email or text message. We have a legitimate interest to do so as this helps make our products or services more relevant to you. We want to provide you with information and services that we think would be of interest to you
- Provide you with specific services and information that you have asked to receive
- Publish your name and award details on our website, where you have successfully received funding from us
- Add your name and short biography to our webpages, where you are a Trustee, or a member of one of our panels

We may keep your details for a reasonable period in order to fulfil any contractual obligations, for example, evaluation of an award you have received from the CSPCT.

If you wish to change how we use your data, you'll find details on how to do so in the 'What are your rights over your personal data?' section below.

We use the CSP's premises to conduct our business. The CSP uses CCTV to protect employees and others, and to protect against theft, vandalism and damage to CSP and CSPCT goods and property. Generally, recorded images are routinely destroyed, and not shared with third parties unless there is suspicion of a crime, in which case they may be given to the police or other appropriate government agency or authority.

## **7) Marketing**

We advertise our awards, Trust and Panel vacancies, and promote the work of the CSPCT via the CSP's online and published resources, for example, the CSP website, it's web portal iCSP, the magazine Frontline and via e-bulletins to CSP members.



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## **8) How we protect your personal data**

Data security is important to everyone. With this in mind, we will treat your data with the utmost care and take all appropriate steps to protect it.

Access to your personal data is password-protected. Where hardcopies of data are kept, the documents are secured in locked storage.

## **9) How long will we keep your personal data?**

We keep your personal data only for as long as it's necessary and in accordance with our internal data retention policy. In some cases, the law may require us to keep personal information for a specific length of time.

## **10) Who do we share your personal data with?**

We sometimes share your personal data with trusted third parties. For example, organisations we collaborate on projects with.

Here's the policy we apply to those organisations to keep your data safe and protect your privacy:

- We provide only the information they need to perform their specific services
- They may only use your data for the exact purposes we specify in our contract with them.
- We work closely with them to ensure that your privacy is respected and protected at all times.
- If we stop using their services, any of your data held by them will either be deleted or anonymised.

We may need to share data under special circumstances, such as where we are under a legal obligation to do so. This includes disclosing your details if required to the police, regulatory bodies or legal advisors.



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We will only share your data with third parties for their own purposes with your consent, given at the time you supply your personal data.

## 11) Where your personal data may be processed

Our data is processed by the below detailed organisations:

- *CSP*  
Our offices are located within the CSP London office, and your data is processed by the CSP, who we have a Data Processing Agreement with. All our data is stored on CSP systems, and the organisation's own privacy policy can be found here: <http://www.csp.org.uk/>.

The CSP's online data sharing resources include:

- The discussion forum iCSP is the community area of the CSP's website, where you can share your knowledge with peers who have interests in common with you.
  - The CSP's e-portfolio and learning hub, where you can access learning activities, such as courses, modules and eBites directly from the CSP, as well as apply for a CSPCT educational award.
  - The CSP website, which hosts the CSPCT's webpages. The website uses [Google Analytics](#), to look at how people use it.
- *Researchfish*  
If you have received research funding from us, your personal data will be processed by Researchfish, a research impact assessment platform for funders, researchers and research institutions.



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- *AMRC*  
If you have received research funding from us, your data may be processed by the Association of Medical Research Charities (AMRC), a membership organisation of the leading medical and health research charities in the UK.

## **12) What are your rights over your personal data?**

The GDPR gives you more control over what happens to your personal information. Under this legislation you have the right to:

- be given clear, transparent and free information about how your data will be used;
- access your personal data so that you can see how your personal information is being used by us;
- have your personal information updated and corrected;
- obtain and reuse the personal data you have given to us for your own purposes;
- request that we stop any consent-based processing of your personal data after you withdraw that consent.
- request that we permanently delete or remove your information where there is no “compelling” reason for us to keep it, for example once the purpose for which we hold the data has come to an end; and
- request that we don’t use your personal data for specific purposes, for example, for direct marketing (either through specific channels, or all channels), and unless we are under a legal or contractual obligation, we must respect your wishes;
- request that, in cases where we are processing your personal data on the basis of our legitimate interest, we stop doing so for reasons connected to your individual situation. We must then stop unless we believe we have a legitimate overriding reason to continue processing your personal data.





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The GDPR also prohibits us from using solely automated technologies to build profiles and make decisions about people who support us which will have “legal or similarly significant effects”, unless:

- it’s necessary to fulfil a contract;
- it’s been authorised by a Union or Member state law; or you’ve given your explicit consent for your information to be used in this way
- If carrying out other types of profiling, we need to tell you about how your information will be used and you can object if you don’t want to be included in that process.

You have the right to request a copy of any information about you that we hold at any time, and also to have that information corrected if it is inaccurate. To ask for your information, please contact CSP Charitable Trust, CSP, 14 Bedford Row, London WC1R 4ED or email [CSPCT@csp.org.uk](mailto:CSPCT@csp.org.uk).

If we choose not to action your request we will explain to you the reasons for our refusal.

### **13) How can you stop the use of your personal data for direct marketing?**

If you are registered on the CSP website, you can update your preferences on your CSP profile,

If you want to change how we are able to use your data, you can change your preferences. Remember, if you choose not to allow us to use your data for some things, we might not be able to provide some services you’ve asked for.

Contact us directly by email at [CSPCT@csp.org.uk](mailto:CSPCT@csp.org.uk).



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#### **14) Contacting the Regulator**

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

You can contact them by calling 0303 123 1113.

Or go online to [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) (opens in a new window; please note we can't be responsible for the content of external websites)

If you are based outside the UK, you have the right to lodge your complaint with the relevant data protection regulator in your country of residence.

#### **15) If you live outside the UK**

For all non-UK contacts:

By using our services or providing your personal data to us, you expressly consent to the processing of your personal data by us or on our behalf. Of course, you still have the right to ask us not to process your data in certain ways, and if you do so, we will respect your wishes.

By dealing with us, you are giving your consent to this overseas use, transfer and disclosure of your personal data outside your country of residence for our ordinary business purposes.

We'll ensure that reasonable steps are taken to prevent third parties outside your country of residence using your personal data in any way that's not set out in this Privacy Notice. We'll also make sure we adequately protect the confidentiality and privacy of your personal data.



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## 16) Transfers out of the UK

We use [Mailchimp](#), [Survey Monkey](#) and Google Analytics to support our web-based activities. (these are all based in the USA). These companies are certified with the [Privacy Shield](#) which requires registered US companies to:

- better safeguard EU citizens' data;
- provide clear privacy information; and
- limit the collection and use of data

The Privacy Shield also allows for more robust monitoring and enforcement by the US Department of Commerce and Federal Trade Commission (FTC) which includes increased co-operation with the European and Swiss Data Protection Authorities.

## 17) Any questions?

We hope this Privacy Notice has been helpful in setting out the way we handle your personal data and your rights to control it.

If you have any questions that haven't been covered, please do contact us:

- Email us at [CSPCT@csp.org.uk](mailto:CSPCT@csp.org.uk)
- Or write to us at CSP Charitable Trust, CSP, 14 Bedford Row, London WC1R 4ED

## 18) Changes to our privacy notice

We keep our policy under regular review, and may amend and update this from time to time. The updated privacy notice will be made available on our webpages, [www.csp.org.uk/charitabletrust](http://www.csp.org.uk/charitabletrust).