

HMSA



Hypermobility Syndromes Association

Privacy Policy

Introduction

We are committed to safeguarding the privacy of our website visitors and members; in this policy we explain how we will handle your personal data.

We will ask you to consent to our use of cookies in accordance with the terms of this policy when you first visit our website.

his privacy policy was last updated on 22/08/2019

Credit

This document was created using a template from SEQ Legal (<http://www.seqlegal.com>).

How we use your personal data

3.1 In this Section 3 we have set out:

- (a) the general categories of personal data that we may process.
- (b) the purposes for which we may process personal data; and
- (c) the legal bases of the processing.

3.2 We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.

3.3 We may process your account data ("**account data**"). The account data may include your name and email address. The source of the account data is you. The account data may be processed for the purposes of operating our website, providing

our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

3.4 We may process your information included in your personal profile on our website ("**profile data**"). The profile data may include [your name, address, telephone number, email address, profile pictures, gender, date of birth, and social media ids. The profile data may be processed for the purposes of enabling and monitoring your use of our website and services. The legal basis for this processing is consent.

3.5 We may process your personal data that are provided in the course of the use of our services ("**service data**"). The service data may include your name, address, telephone number, email address, and other information sent to us for example as part of an enquiry to our helpline. . The source of the service data is you. The service data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is consent.

3.6 We may process information that you post for publication on our website or through our services] ("**publication data**"). The publication data may be processed for the purposes of enabling such publication and administering our website and services. The legal basis for this processing is consent

3.7 We may process information contained in any enquiry you submit to us regarding products and/or services ("**enquiry data**"). The enquiry data may be processed for the purposes of offering, marketing and selling relevant products and/or services to you. The legal basis for this processing is consent

3.8 We may process information relating to transactions, including donations or purchases of goods and services, that you enter into with us and/or through our website ("**transaction data**"). The transaction data may include your contact details, your card details and the transaction details. The transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely our interest in the proper administration of our website and business.

3.9 We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("**notification data**"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is consent.

3.10 We may process information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the

website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.

3.11 We may process any of your personal data identified in the other provisions of this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

3.12 In addition to the specific purposes for which we may process your personal data set out in this Section 3, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

3.13 Please do not supply any other person's personal data to us, unless we prompt you to do so.

Providing your personal data to others

4.1 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice and managing legal disputes

4.2 We will share limited donor personal data (profile and/or service) to the relevant fundraiser where donations are made, insofar as reasonably necessary to inform them that an associated donation has been made.

4.3 We may disclose name and contact details to our suppliers or subcontractors insofar as reasonably necessary for organising or attending events.

4.4 Financial transactions relating to our website and services are handled by our payment services providers, Stripe, GoCardless, and Paypal. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. You can find information about the payment services providers' privacy policies and practices at the following URLs:

- Stripe (URL <https://stripe.com/gb/privacy>)
- GoCardless (URL <https://gocardless.com/legal/privacy/>)
- Paypal (URL <https://www.paypal.com/ie/webapps/mpp/ua/privacy-full>)

4.5 Your data may also be available to our website provider to enable us and them to deliver their service to us, carry out analysis and research on demographics, interests and behavior of our users and supporters to help us gain a better understanding of them to enable us to improve our services. This may include connecting data we receive from you on the website to data available from other sources. Your personally identifiable data will only be used where it is necessary for the analysis required, and where your interests for privacy are not deemed to outweigh their legitimate interests in developing new services for us. In the case of this activity the following will apply:

1. Your data will be made available to our website provider
2. The data that may be available to them include any of the data we collect as described in this policy.
3. Our website provider will not transfer your data to any other third party, or transfer your data outside of the EEA.
4. They will store your data for a maximum of 7 years.
5. This processing does not affect your rights as detailed in this privacy policy.

4.6 In addition to the specific disclosures of personal data set out in this Section 4, we may also disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

International transfers of your personal data

5.1 In this Section 5, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA).

5.2 You acknowledge that personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

Retaining and deleting personal data

6.1 This Section 6 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

6.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

6.3 We will retain and delete your personal data as follows:

(a) *Data collected through this website* will be retained for 7 years following *the date it was collected*, at the end of which period it will be deleted from our systems.

6.4 Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal

obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

Amendments

7.1 We may update this policy from time to time by publishing a new version on our website.

The “last updated” legend at the top of this Privacy Policy should be used to indicate when this Privacy Policy was last updated.]

7.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

7.3 We may notify you of changes to this policy by email.

Your rights

8.1 You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).

8.2 We may withhold personal information that you request to the extent permitted by law.

8.3 You may instruct us at any time not to process your personal information for marketing purposes.

8.4 In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

Third party websites

9.1 Our website includes hyperlinks to, and details of, third party websites.

9.2 This privacy policy only governs our websites and we are not responsible for the privacy policies that govern third party websites even where we have provided links to them. If you use any link on our website we recommend you read the privacy policy of that website before sharing any personal or financial data

9.3 We operate a number of social media pages (including Facebook, Twitter, You Tube, LinkedIn and Instagram). Although this policy covers how we will use any data collected from those pages it does not cover how the providers of social media websites will use your information. Please ensure you read the privacy policy of the social media website before sharing data and make use of the privacy settings and reporting mechanisms to control how your data is used.

Personal data of children

10.1 Our website and services are targeted at persons over the age of [13]

10.2 If we have reason to believe that we hold personal data of a person under that age in our databases, we will delete that personal data, unless it is information that is necessary to fulfil our contractual obligations regarding membership.

Updating information

11.1 Please let us know if the personal information that we hold about you needs to be corrected or updated.

About cookies

13.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

13.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

13.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

Cookies that we use

14.1 We use cookies for the following purposes:

1. **Necessary cookies:** Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.
2. **Statistic cookies:** Statistic cookies help website owners to understand how visitors interact with websites by collecting and reporting information anonymously.
3. **Marketing cookies:** Marketing cookies are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third party advertisers.

Cookies used by our service providers

15.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

15.2 We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. This data may be stored

outside the EU, under a EU-US Privacy Shield agreement. The information gathered relating to our website is used to create reports about the use of our website.

Google's privacy policy is available at: <https://www.google.com/policies/privacy/>. [The relevant cookies are: `_ga`, `_gid`, `_gat`, `__utma`, `__utmt`, `__utmb`, `__utmc`, `__utmz` and `__utmv`.

Managing cookies

16.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- (c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- (e) <https://support.apple.com/kb/PH21411> (Safari); and
- (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

16.2 Blocking all cookies will have a negative impact upon the usability of many websites.

16.3 If you block cookies, you will not be able to use all the features on our website.

Our details

17.1 This website is owned and operated by The Hypermobility Syndromes Association.

17.2 We are a registered charity in England and Wales under registration number 1011063 and our registered office is at 49 Greek Street, Soho, London, W1D 4EG

17.3 You can contact us:

- (a) by post, using the postal address given above;
- (b) using our website contact form;
- (c) by telephone, on [the contact number published on our website; or

(d) by email, using the email address(es) published on our website from time to time.

Data protection officer

18.1 Our data protection officer's contact details are: *Donna Wicks*, email donna@hypermobility.org

Complaints

20.1 If you have a complaint about us, or the treatment of your data, you can contact the Charity Commission. The Charity Commission is the independent watchdog for charities. You can make a complaint about a charity on their website at www.charity-commission.gov.uk.

20.2 If you've got a complaint about our fundraising activities you can also complain to the Fundraising Regulator. To find out how to go about making a complaint, go to the Fundraising Regulator website at <https://www.fundraisingregulator.org.uk/make-a-complaint/complaints/>