

Website privacy and cookies policy

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About this policy

The National Centre for Smoking Cessation and Training (**NCSCT/we/us/our**) is a social enterprise committed to support the delivery of effective evidence-based tobacco control programmes and smoking cessation services provided by local stop smoking service providers.

This policy explains how we collect and use personal data from and about visitors to our website through browsing, purchasing items and registering to access online training courses through our website. This policy does not apply to our face-to-face training courses; please see our Training Course Attendee Privacy Notice.

Our objective is to ensure that you are never surprised by how your personal data has been used by us. You are therefore encouraged to read this policy. As we make changes to our website, we may need to update this policy. If we make any important changes that affect your rights and interests, we will make sure we bring this to your attention and explain what this means for you.

If you have any questions in relation to this policy or wish to exercise any of your rights under data protection law, you should Dr Andy McEwen by email at <u>andy.mcewen@ncsct.co.uk</u>.

Who we are

This website is operated by NCSCT, the trading name of NCSCT Community Interest Company. We are registered in England and Wales under company number 07394485. We are also registered as a controller in relation to personal data with the UK Information Commissioner's Office under number 22647905.

The personal data we collect about you

Personal data means any data that identifies or can be used to identify a person. It does not include data where the identity has been removed (anonymous data).

You may provide the following kinds of personal data to us:

- Identity and contact data: your name and contact details (generally work rather than personal details) when you <u>subscribe to our mailing list</u>, purchase any items from the <u>NCSCT</u> <u>Shop</u>, get in touch with us by <u>email, post or telephone</u>, or register for any of our <u>online</u> <u>training programmes</u>
- Biographical data: if you register for any of our online training courses, the name and type
 of your employing organisation, local authority (if applicable), background profession, job
 title, smoking cessation role, proportion of role spent on smoking cessation, specific lead
 area or area of interests. We may optionally ask for your age, gender and ethnicity
- Login data: your login details when you create an account for the NCSCT shop or online training
- Online training data: details of online training courses taken including, where applicable, courses(s) for which you have registered, date course(s) taken, results of training assessments, certification status

- Transactional data: details of any items purchased through the NCSCT Shop including payment card details (which we are unable to view)
- Preference data: preferences for e-bulletins and other email communications
- Communications data: the content of any messages you exchange with us by email, post or telephone and any posts and messages directed to us on social media

Unless you specifically inform us or we ask for the data on an optional basis, we do not collect any 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.

We also collect the following analytical data through your use of our website:

- the IP address assigned to you or to someone who provide you with Internet access
- the unique identifier of the device used by you to visit our website
- technical data about the device used by you to visit our website including device type, operating software, browser and browser plug-ins, screen resolution and time zone setting
- data about how you browsed our website including how you arrived at our website, the time and frequency of your visits, the time spent by you on each page, how you interacted with the website, the links that you click, documents you download and content that you view

The extent to which this analytical data can identify you is very limited and we do not use analytical data to identify specific visitors to our website.

How we use your personal data

We will only use your personal data when the law allows us to. We will generally rely on one of three legal grounds for using your personal data:

- where we need to perform the contract we are about to enter into or have entered into with you (see our <u>Terms & Conditions</u>)
- where necessary for our legitimate interests or those of a third party, provided those interests do not override your fundamental rights and interests
- where we need to comply with a legal or regulatory obligation

Specifically, we will use your personal data as follows:

Purpose(s)	Categories of personal data	Legal ground(s) for use	
To register you as a customer for the NCSCT Shop or as a user for Online Training	Identity and contact data; biographical data; login data	Performance of our contract with you (to sell items to you or provide you with access to online training); necessary for our legitimate interests (understanding the demographic profile of online training attendees for research purposes and to develop our offering)	
To process and deliver any orders for items through the NCSCT Shop	Identity and contact data; login data; transactional data	Performance of our contract with you	
To provide online training and assessment	Identity and contact data; biographical data; login data; online training data	Performance of our contract with you	
To maintain and publish a list of <u>NCSCT Certified Practitioners</u> on our website	Identity and contact data; online training data	Consent (which can be withdrawn at any time by contacting us)	
To maintain and send messages to contacts on our mailing lists	Identity and contact data	Consent (which can be withdrawn at any time by clicking the unsubscribe link in the relevant communication)	
To respond to any enquiries you have submitted to us through our website or social media	Identity and contact data; communications data	Necessary for our legitimate interests (responding to any requests for information and other enquiries and providing advice and guidance)	
To improve our website and its functionality	Analytical data	Necessary for our legitimate interests (improving the relevance and usability of our website and its functionality and informing our strategy)	

Who we share your personal data with

We may share your personal data with:

- service providers including our hosting provider, email marketing platform and analytics provider
- your employing organisation, where appropriate
- HM Revenue & Customs, the tax authority in the UK who require reporting of our processing activities in certain circumstances
- any third parties to whom we may choose to sell, transfer or merge parts of our business or assets or third parties we may seek to acquire or merge with (if any change happens to our business, the new owners may use your personal data in the same way as set out in this policy)

We may use data on aggregated and anonymised (so that it can no longer be associated with you) basis for research purposes and such aggregated and anonymised data may be shared with third parties (including but not limited to funding bodies such as Public Health England)

Where your personal data are stored

Some of the service providers that we use in connection with our website and the services provided through it are based outside the European Economic Area (**EEA**), which means that your personal data may be transferred outside the EEA. Whenever we transfer your personal data outside the EEA, we ensure that a similar degree of protection applies to your personal data in one or more of the following ways:

- the country to which your personal data is transferred is deemed by the European Commission to provide a similar degree of protection for your personal data;
- we have entered into a specific contract with our service providers that has been approved by the European Commission as providing a similar degree of protection for your personal data; and
- where any service provider is based in the US and they have self-certified under the <u>EU-US</u>
 <u>Privacy Shield Framework</u> which requires them to provide a similar degree of protection for your personal data.

How we keep your data secure

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. We also limit access to your personal data to those within our organisation that have a need to access it. They will only process your personal data on our instructions and they are required to keep your personal data confidential. We have put in place procedures to deal with any suspected personal data breach and will notify you and the Information Commissioner's Office or any other relevant regulator where we are legally required to do so.

How long we keep your personal data for

We will only keep your personal data for as long as necessary in connection with the purposes we collected it for and to comply with any legal, accounting or reporting requirements. To determine how long we keep your personal data for, we consider the amount, nature and sensitivity of the personal data, the purposes for which it was collected and the potential risk of harm from us continuing to keep it.

- If you have purchased any items through the NCSCT Shop, we will retain details of your order for a period of six years from the date of your order for tax purposes.
- We will retain personal data relating to email marketing data until you unsubscribe or your email address has become permanently unavailable.

In some circumstances we will anonymise your personal data for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Cookies

This website uses cookies. Cookies are small text files that are stored on your device and contain a uniquely generated reference which is used to distinguish you from other people each time your visit our website, even if the IP address of the device used by you to visit our website changes. None of the cookies used on our website store data that can directly identify you.

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. You can read more information cookies and how they work at <u>All About Cookies.org</u>.

The cookies used by our website fall into the following categories:

• Strictly necessary cookies: these are required for the effective and secure use of our website to include enabling you to send messages to us securely, log into secure areas of our website and to make payments securely:

We are required to obtain your consent to all cookies except those that are strictly necessary. You will be asked to confirm your consent when you first visit our website. Alternatively, you can <u>clear cookies</u> after you visit our website. The specific cookies used by our website are as follows:

Cookie	Туре	Duration	Further details
PHPSESSID	Strictly necessary	When browsing session ends	These cookies are use to establish a unique user session on the web server. It is used, for example, to enable you to login and to remember the items stored in your basket as you browse the website.
session	Strictly necessary	When browsing session ends	

If you block or restrict cookies, you may not be able to use certain features of our website.

Your rights

You have a number of rights in relation to the personal data we hold about you:

- Access: You have the right to be provided with a copy of your personal data together with certain information about the processing of such personal data
- Correction: You have the right to ask for any inaccurate or incomplete personal data to be corrected
- Restriction: You have the right to ask for the use of your personal data to be restricted, for example, to confirm its accuracy or the company's reasons for holding it
- Objection: You have the right to object to the company holding your personal data based on its legitimate interests or those of a third party based on your particular circumstances. You also have the right to object to the company holding your personal data for direct marketing purposes
- Deletion: You have the right to ask the company to delete or remove your personal data where there is no good reason for the company to continue holding it or where you have exercised your right of objection
- Portability: You have the right to receive or request the transfer of a copy of your personal data in an electronic format where the basis of the company holding such data is your consent or the performance of a contract and the information has been processed by automated means
- Complaints: You have the right to complain to the <u>Information Commissioner's Office (ICO)</u> or any other <u>EU supervisory authority</u> in relation to how the company collects and uses your personal data

You will not have to pay any fee to exercise any of the above rights, though the company may charge a reasonable fee or refuse to comply with your request if any request is clearly unfounded or excessive. Where this is the case, you will be notified in writing. The company may ask you to verify your identity before fulfilling any request in relation to your personal data. For further information about your rights visit the ICO's website at: www.ico.org.uk/your-data-matters.

To protect the confidentiality of your personal data we may ask you to verify your identity before fulfilling any request in relation to your personal data.

Your feedback on this policy

Did you find this policy clear and easy to read? We would love to hear from you.