



# *International Federation of Aromatherapists*

## **REGISTRANT PRIVACY POLICY NOTICE**

### **1. INTRODUCTION**

The International Federation of Aromatherapists (IFA) is committed to protecting and respecting your privacy and is a data controller registered with the Information Commissioner's Office, (reference number ZA067772). This policy (together with the terms of use and any other documents referred to in it) sets out the basis on which any personal data the IFA collects from you, or that you provide to it, will be processed.

### **2. THE PURPOSE(S) OF PROCESSING YOUR PERSONAL DATA**

The IFA processes personal data predominantly about those who are registered with it and who have applied to register with it and for those who are no longer registered with it. The IFA holds data about a practitioner's health and criminal convictions if they have given it this information, or if the police have notified it of a conviction. Your personal data is processed for one or more of the following purposes:

- To decide eligibility for classifications of membership
- To decide eligibility to be an approved qualification provider
- To decide eligibility to be an approved teacher
- To decide eligibility to be enrolled on an IFA qualification
- To decide eligibility to be a Board or Committee member
- To decide eligibility to be an IFA Quality Assurance Assessor
- To enable the public to check our register of qualified practitioners and their status
- To enable the public to source and check an approved qualification provider and their status
- To enable the public to source and check an approved teacher and their status
- To administer, maintain and update the practitioner, teacher and qualification provider registers
- To process and respond to enquiries about aromatherapy and training
- To respond to complaints received about a registrant/teacher/approved qualification provider
- To process attendance at events convened by the IFA
- To communicate with registrants and customers about news, updates and events
- To process and dispatch orders made through the IFA's online shop
- To conduct surveys
- To analyse trends and compile statistics
- For audit purposes

#### **Special categories of data**

Any information you have given explicit consent to provide about your DOB, disability or gender will only be used for the purpose of statistical analysis and reported in an anonymised form on the diversity of registrants or in accordance with the Equal Opportunity and Diversity policy/Reasonable Adjustment and Special Considerations Policy for learners to access IFA Qualification(s). If a copy of your health records is required to assist an investigation into a complaint, you consent to your health record being provided to the Disciplinary Committee.

### **3. PERSONAL DATA WE COLLECT**

The IFA collects the following data:

- Full name



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- DOB
- Photo ID (for learners)
- Qualification(s)
- Certificate(s)
- Address
- Telephone number(s)
- Email
- CV (for Teachers, Quality Assurance Assessors, Board and Committee Members, Specialist Advisors, Speakers)
- Passport (for Quality Assurance Assessors travelling overseas)
- Health Records (only if an investigation necessitates or for the purpose of applying reasonable adjustment and special considerations)
- Bank Details
- Marriage Certificate (when there is a name change)
- Doctors Certificate/Death Certificate (for learners to authorise absence from examinations)

#### **4. SHARING YOUR PERSONAL DATA**

Your personal data will be treated as strictly confidential, and will be shared only for the following purposes:

- When it is in the public interest to do so
- To verify applicants' credentials with the Complementary and Natural Healthcare Council (CNHC)
- To register trustee board members with the Charity's Commission and Companies House
- In response to enquiries about aromatherapy
- In response to enquiries about IFA qualifications
- When required to do so by law
- Disclosure and Barring Scheme

The IFA shares with the public the following information about registrants and that you have provided and consented to being shared:-

- Full name
- Qualification/Category of membership status
- Areas of specialism
- City, county country and postcode of workplace
- Telephone number(s)
- Email
- Website
- Profile (for Board and Committee members, Specialist Advisors and Quality Assurance Assessors)

#### **5. WHAT IS THE IFA'S LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA?**

##### **Personal data (article 6 of GDPR)**

- Consent of the data subject;



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- Processing necessary for the performance of the IFA's regulatory function or to take steps to register with the IFA
- Processing necessary for compliance with our legal obligation
- Processing necessary to protect the vital interests of a you or another person
- Processing necessary for providing information in the public interest
- Processing necessary for the purposes our legitimate interests or that of a third party

## **Special categories of personal data (article 9 of GDPR)**

The IFA's lawful basis for processing your special categories of data:

- Explicit consent of the data subject
- Processing necessary for carrying out regulatory function, obligations under employment/sub contracting or a collective agreement
- Processing necessary to protect the vital interests of a data subject or another individual where the data subject is physically or legally incapable of giving consent
- Processing relates to personal data manifestly made public by the data subject
- Processing necessary for the establishment, exercise or defence of legal claims or where courts are acting in their judicial capacity
- Processing necessary for reasons of substantial public interest on the basis of EU or Member State law
- Processing necessary for reasons of preventative or occupational medicine, for assessing the working capacity of a registrant or an employee, medical diagnosis, the provision of health or social care or treatment or management of health or social care systems and services on the basis of EU or Member State law or a contract with a health professional
- Processing necessary for the reasons of public interest in the area of public health
- Processing necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes

## **6. HOW LONG IS YOUR PERSONAL DATA KEPT?**

Your personal data is kept for no longer than reasonably necessary. Please see Record [Retention and Disposal Policy](#).

## **7. YOUR RIGHTS TO YOUR PERSONAL DATA**

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which is held about you;
- The right to request that the IFA corrects any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to request that the IFA provides you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable e.g. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means);



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- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request that a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable e.g. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

To access any of your personal data of you have been subject you must make a written 'subject access request'. This must be sent to the attention of the IFA's Data Protection Officer Keely Eleftheriou at [office@ifaroma.org](mailto:office@ifaroma.org), 146 South Ealing Road, Ealing, London W5 4QJ. The IFA is not obliged to supply the information mentioned above unless the data subject has made a written request and has paid the fee of £10.00. All requests will be addressed promptly and within the statutory deadline of 40 days.

## **8. TRANSFER OF DATA ABROAD**

Transfer of personal data to countries or organisations outside of the EEA will only take place if appropriate measures are in place to protect the security of that data. There is generally no need to transfer data outside of the European Economic Area (EEA).

## **9. FURTHER PROCESSING**

If the IFA wishes to use your personal data for a new purpose, not covered by this Privacy Policy, then you will be provided with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

## **10. DIRECT MARKETING**

The IFA is subject to specific rules under the GDPR in relation to marketing its services. Data subjects have the right to reject direct marketing and the IFA must ensure that registrants are given this option at first point of contact. When a data subject exercises their right to reject marketing the IFA will desist immediately from sending further communications.

## **11. CHANGES TO THIS PRIVACY POLICY**

Any changes we may make to this Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to this Privacy Policy.

## **12. HOW TO MAKE A COMPLAINT**

To exercise all relevant rights, queries or complaints please in the first instance contact the IFA's Data Protection Officer Keely Eleftheriou at [office@ifaroma.org](mailto:office@ifaroma.org). If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](#).