



International Federation of Aromatherapists

DATA PROTECTION POLICY

1. INTRODUCTION

The International Federation of Aromatherapists ('IFA') recognises in order to protect the public and fulfil its regulatory function the IFA needs to collect and use personal data for its registrants and customers which will be treated in accordance with the Act. This policy provides the framework through which the IFA effectively manages and fulfils its legal responsibilities.

2. PURPOSE

The purpose of this policy is to set out the IFA's commitment to the Data Protection Act 1998 ('the Act') and set out the principles of data protection that it follows in its work when processing and storing your data.

3. DEFINITIONS

For the avoidance of doubt, personal data, or personal information, means any information about an individual from which that person can be identified. You can find out more about personal data from the [Information Commissioners Office](#).

Identity Data includes first name/last name.

Contact Data includes billing address/delivery address/email address/telephone numbers/social media address.

We also collect, use and share **aggregated data** such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you (this includes 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).

If you fail to provide personal data

Where we need to collect your personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

4. RESPONSIBILITIES

The IFA strives to ensure it treats personal information lawfully and correctly and its staff are trained how to handle personal data during induction and other continual



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professional development activities. The IFA is a registered data controller with the Information Commissioner's Office, reference number ZA067772. This means that it is required by law to ensure that everyone who processes personal data and special categories of personal data during the course of their work with the IFA does so in accordance with the data protection legislation, including the GDPR principles. Any deliberate infringement of the Act will be reported to the IFA's Data Protection Officer Keely Eleftheriou at office@ifaroma.org, which may be considered under the Disciplinary Procedure.

5. SCOPE

The IFA predominantly holds information about those who are registered with the IFA, those who have applied to register and those who are no longer registered with it. The IFA also holds personal information about:

- Board and Committee Members
- Individuals involved in investigating complaints
- Employees
- Contractors
- Specialist advisors
- Those who place an order through our online shop

All personal information is collected, stored, used and disposed of in accordance with the data protection legislation, including the GDPR principles.

6. WHAT IS THE DATA PROTECTION ACT/GDPR?

The UK's data protection legislation, including the General Data Protection Regulations (GDPR) contains strict principles and legal conditions which must be followed before and during any processing of any personal information. The Act implements the European Directive on Data Protection. According to the European Commission *"personal data is any information relating to an individual, whether it relates to her or his private, professional or public life. It can be anything from a name, a home address, a photo, an email address, bank details, posts on social networking websites, medical information, or a computer's IP address."*

The principles

The Act contains eight basic principles:

1. Personal data shall be processed fairly and lawfully and shall not be processed unless certain conditions are met in relation to personal data and additional conditions are met in relation to sensitive personal data. The conditions are:
 - The data subject has given his consent to the processing, or
 - The processing is necessary for the various purposes set out in the Act.
2. Personal data shall be obtained only for one or more specified and lawful purposes and shall not be processed in any manner incompatible with that purpose or those purposes.



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3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and, where necessary, kept up to date.
5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
6. Personal data shall be processed in accordance with the rights of data subjects under the Act.
7. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, data.
8. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

7. USE OF PERSONAL DATA

The IFA's Privacy Policy explains what data we hold about you and who we share it with.

If we have gathered data for one specific purpose, we will not simply use the same information for another incompatible purpose.

8. SECURITY

The personal data we hold for you will be kept confidential and secure and only processed by authorised personnel. The IFA has in place proportionate and appropriate technical and organisational measures to protect against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to data. Appropriate obligations will be incorporated into third party contracts. 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.

9. DATA 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. Details of retention periods for different aspects of your personal data are available in our [Data Retention & Disposal Policy](#).



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In some circumstances 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.

10. DATA SUBJECT RIGHTS

At any time, a data subject can request that the IFA take any of the following actions, subject to certain legal limitations, with regard to their personal data:

- Provide a copy of the personal data we hold for them
- Request corrections to be made to data hold about them
- Request erasure of data (in certain circumstances)
- Request that processing restrictions be put in place
- Request that a restriction is placed on further processing;

To access any of your personal data 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, 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 called a subject access request and has paid the fee of £10.00.

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.

All requests will be addressed promptly and within the statutory deadline of 40 days.

11. BREACHES OF DATA PROTECTION

The IFA and all employees comply with these principles of GDPR and rules at all times in their information-handling practices. We are committed to ensuring that these principles and rules are followed, as the IFA takes the security and protection of data very seriously.

You must inform us immediately if you become aware that any of these principles or rules have been breached or are likely to be breached by contacting the IFA's Data Protection Officer Keely Eleftheriou at office@ifaroma.org, 146 South Ealing Road, Ealing, London W5 4QJ.

A personal data breach will arise whenever any personal data is lost, destroyed, corrupted or disclosed; if someone accesses the data or passes it on without proper authorisation; or if the data is made unavailable and this unavailability has a significant negative effect on a data subject.

In the event of a Breach the IFA's Data Protection Officer will take the following steps:

- Contain the breach;
- Assess the potential adverse consequences for individuals, based on how serious



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or substantial these are, and how likely they are to happen; and

- To limit the scope of the breach by taking steps to mitigate the effects of the breach.
- The Data Protection Officer will determine within 72 hours the seriousness of the breach and if the Information Commissioner's Office (ICO) and/or data subjects need to be notified of the breach.

12. TRANSFER TO ANOTHER COUNTRY

We do not generally have a need to transfer data outside of the European Economic Area (EEA). However, if we are requested to transfer personal data to a country or organisation outside of the EEA, we will not transfer personal unless that country or organisation ensures an adequate level of protection in relation to the processing of personal data and have in place safeguards.

13. CHANGES TO THIS POLICY

We reserve the right to change this policy at any time so please always check this document regularly to ensure you are following the correct procedures. This policy was last updated on 26th May 2018.

14. FURTHER INFORMATION

The Information Commissioner has produced a Guide to the Act. This can be obtained by contacting the Office of the Information Commissioner on (01625) 545745. Alternatively, you can access their web site at www.ico.gov.uk

15. QUERIES, REQUESTS OR CONCERNS

To exercise all relevant rights, queries or complaints in relation to this policy or any other data protection matter between you and us, please in the first instance contact our Data Protection Officer Keely Eleftheriou at 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 please visit their website www.ico.gov.uk.