



HFMA privacy policy

Summary

Why do you collect my information?

Healthcare Financial Management Association (“HFMA”) collect personal information for the in order to provide you with services and to ensure we communicate with you effectively. HFMA will ensure that personal information is only collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

Who do you share my information with?

HFMA may share your personal information internally within our organisation and with third-party’s who provide services on our behalf. HFMA may also share some limited information with other third party organisations but will only do so with your explicit consent.

How long do you keep my information?

We will retain your personal information for no longer than necessary and only use it for the purposes for which it was collected.

How do I contact you?

If you have any questions or concerns regarding our Privacy Policy or our processing of your personal information, please contact:

Data Protection Team
HFMA
1 Temple Way
Bristol
BS2 0BU

Email: info@hfma.org.uk.
Phone: 0117 929 4789

Who we are

- HFMA is a registered charity in England and Wales, no 1114463 and Scotland, no SCO41994. HFMA is also a limited company registered in England and Wales, no 5787972.
- HFMA believe it is important to protect your privacy and we are committed to giving you a service that meets your needs in a way that also protects your privacy.
- HFMA recognises The General Data Protection Regulation (“GDPR”) (Regulation (EU) /679) adopted 27 April 2016.

We collect personal information in the following ways:

- when you engage with us and agree to take a service or product from us.
- when you contact us with an enquiry or in response to a communication from us, in which case this may tell us something about how you use our services.
- Information you provide via our websites, digital platforms and services. We also collect information about the services, websites and digital platforms you use and how you use them.
- on behalf of our customers, e.g. NHS staff/student enrolments in training schemes, event bookings provided by an event booker, or sales lead referrals provided by a third party.
- through market research, e.g. contacting NHS associations to collect people's roles, and purchased contact information from third parties.

Wherever possible we use aggregated or anonymous information which does not identify individuals.

Data protection law recognises that certain categories of personal information are more sensitive. This is known as sensitive personal data and covers health information, race, religious beliefs, political opinions, and more. We do not usually collect personal information about our members or customers unless there is a clear reason for doing so.

What personal information we may collect and process

We may collect the following types of personal information:

- contact information (e.g. name, address, phone number, email, contact/subscription preferences)
- records of communication (e.g. emails, telephone calls, written correspondence, meetings)
- membership information (e.g. interests, qualifications, HFMA network affiliation)
- event booking and attendance information
- feedback and survey data
- financial information (e.g. bank account details for processing payments, payroll, and invoices)
- application forms, training records, CPD data and certifications
- resumes and references, employment history, and qualifications
- job roles and employment details
- activity and interactions with HFMA emails

The personal information HFMA collects will be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

Purpose for the collection and use of your personal information:

- to identify you when you contact us;
- to help identify products or services which you could have from us or selected partners from time to time. We may do this by automatic means using a scoring system, which uses the information you have provided, any information we hold about you and information from third party agencies (including credit reference agencies);
- improve our products and services
- to help administer, and contact you about improved administration of, any accounts or services we have provided before, or provide now or in the future;

- to carry out marketing analysis, conduct research, including creating statistical and testing information;
- to help to prevent and detect fraud or loss;
- to contact you in any way (including mail, email, telephone, text or multimedia messages) about services offered by us and/or selected partners unless you have previously asked us not to do so;
- to offer the benefits of HFMA Affiliate membership, such as copies of the member magazine, e-newsletter and HFMA webinars.
- monitor diversity of users of HFMA services and products

We may monitor and record communications with you (including phone conversations and emails) for quality assurance and compliance reasons.

HFMA will ensure that personal information is only collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

HFMA Websites and Digital Platforms

HFMA websites and digital platforms are online systems that HFMA use to deliver services to our members and customers. They include but are not limited to:

- The HFMA Website
- The HFMA Academy Virtual Learning Environment
- The HFMA E-learning Learning Management System
- The FSD events systems
- The HFMA mentor match system

If you register on our website or digital platforms, then the following will also apply:

- HFMA websites and digital platforms collect personal information when you register with us.
- Our website and digital platforms, when you register, will collect information such as name, email address and postcode. Once you register with the website or digital platform you will not be anonymous to us when you subsequently sign in.
- As part of the registration process and continued use of HFMA services, you agree that any registration information you give HFMA will always be accurate, correct and up to date. You can contact HFMA should you need to amend any of your personal information.
- We collect and retain information about your interactions with us so that we can process your interactions and deal with future queries.
- We use cookies to allow us to store limited information on an individual's computer to either track them through tracking cookies or to allow people to have automatic logons as an example. We use this information to provide you with a good experience when browsing our website, digital platforms and to improve the functionality of our site.

Your debit and credit card information

If you use a credit or debit card to buy something or pay for a registration online or over the phone, we will ensure that this is done securely and in accordance with the Payment Card Industry Data Security Standard. You can find out more information about PCI DSS here -

https://www.pcisecuritystandards.org/security_standards/index.php

If we receive an email containing and credit or debit card detail, it will be processed as per your instructions and the email then deleted. Direct debit information will be stored securely within HFMA

finance systems. Paper copies of the direct debits are stored in a secure location for a period of time that is required for administration and audit purposes.

Legal basis & Legitimate Interests

When we collect and use your personal information, we will make sure that this is only done in accordance with at least one of the legal grounds available under GDPR:

- consent has clearly been given by an individual to use your information for a previously notified purpose, such as to send you marketing emails or to provide you with a product, service or information at your request.;
- the processing is necessary for legitimate interests of HFMA or the legitimate interests of an organisation that is delivering services on behalf of HFMA, unless there is good reason to protect the individual's personal data which overrides those legitimate interests.
- the processing is necessary for a contract that HFMA has with an individual, or because they have asked us to take specific steps before entering into a contract;
- processing is necessary for HFMA to comply with the law (not including contractual law);
- the processing is necessary for HFMA to perform a task in the public interest.

In certain instances, we may collect and use personal information where this is necessary in our legitimate interest as a charity, this includes being able to:

- send direct marketing material to members and associates by post or contacting them by telephone for purposes of informing you about services, event and products that we offer.
- conduct research to better understand what our members and associates may be interested in.
- maintain and administer our customer database, digital platforms, and systems.

In all cases, we balance our legitimate interests against your rights as an individual and make sure we only use personal information in a way or for a purpose that you would reasonably expect in accordance with this policy and that does not intrude on your privacy or previously expressed marketing preferences.

Do we process 'sensitive' personal information?

Under data protection law, certain categories of personal information are recognised as sensitive, including health information and information regarding race, religious beliefs, and political opinions ('sensitive personal data'). In limited cases, we may collect sensitive personal data about you. We would only collect sensitive personal data if there is a clear reason for doing so, such as where we need this information to ensure that we provide appropriate facilities or support to enable you to participate in HFMA events and services.

Providing your personal information to others

Subject to your communication preferences and HFMA's terms and conditions, HFMA may share your personal information with our third-party service providers, and associated organisations for the purposes of completing tasks and providing services to you on our behalf. However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place requiring them to keep your information secure and not use it for their own purposes.

We may allow other people and organisations to use information we hold about you, if we have been legitimately asked to provide information for legal or regulatory purposes or as part of legal proceedings or prospective legal proceedings.

We may share non-personal information (for example, aggregated or anonymised data) publicly and with our associations. For example, we may publish research on, or help us generally improve our products and services.

Keeping your personal information

If you request that we stop processing your personal information for the purpose of marketing, we may in some instances need to add your details to a suppression file to enable us to comply with your request not to be contacted.

In respect of other personal information, we will retain it for no longer than necessary for the purposes for which it was collected, taking into account guidance issued by the Information Commissioner's Office.

Your choices

You have a choice about whether, or not, you wish to receive information from us. If you do not want to receive direct marketing communications from us about products, services and events then you can select your preferences by ticking the relevant boxes situated on the form on which we collect your information.

If you are an existing customer of HFMA, we may contact you about services, products and events that are of a legitimate interest to you and HFMA.

You can change your marketing preferences at any time (including telling us that you don't want us to contact you for marketing purposes) by:

- Indicating that you do not wish to receive our marketing emails by clicking the 'unsubscribe' link in at the end of our marketing emails;
- Indicating that you do not wish to receive push notifications from the HFMA mobile app by switching off all notifications
- Contacting us by email: info@hfma.org.uk or telephone on 0117 929 4789 or by writing to us at: Data Protection Team HFMA, 1 Temple Way, Bristol, BS2 0BU
- Updating your contact preferences on our members website portal.

If you have indicated that you do not wish to be contacted for marketing purposes, we will maintain your details on a suppression list to help ensure that we do not continue to contact you for marketing purposes. However, we may still need to contact you for administrative purposes, including (but not limited to):

- Processing membership services payments;
- Providing you with the information you need in order to participate in an activity or event for which you have registered; and
- Explaining any changes to our terms and conditions of service and the delivery of HFMA services or services delivered on behalf of a third party.

Your ability to edit or delete your account information preferences

The accuracy of your personal information is important to us. If your contact details have changed or you think any information we have about you is incorrect or incomplete, you can always update or correct the information we hold about you by contacting us through our contact team. Please contact

our support centre on 0117 929 4789 or info@hfma.org.uk or write to Data Protection Team, HFMA, 1 Temple Way, Bristol, BS2 0BU.

Your data protection rights

Under GDPR, you have the right to request a copy of the personal information we hold about you and to have any inaccuracies corrected. You also have the right to request us to erase your personal information or to restrict our processing of your personal information or to object to our processing of your personal information.

Should you wish to exercise these rights we require you to prove your identity with two pieces of approved identification. Please address requests to the Data Protection Team, HFMA, 1 Temple Way, Bristol, BS2 0BU and we will respond within 40 days, of receipt if your written request and confirmed ID. Please provide as much information as possible about the nature of your contact with us to help us locate your records.

Where you have provided your consent for our use of your personal information, you always have a right to withdraw your consent at any time.

Why we are allowed to process your personal information

Our Privacy and Cookie Policies take into account several laws, including:

- the Data Protection Act 1998
- the Privacy and Electronic Communications (EC Directive) Regulations 2003
- General Data Protection Regulation (EU) 2016/679, which will come into force in the UK in May 2018 and replaces the Data Protection Act 1998.

Generally, our processing of your personal information as described in this policy is allowed by these laws because we have a legitimate need to carry out the processing for the purposes described above. Some processing may also be necessary so that we can fulfil a contract with you or because it is required by law. We only use your information to send you marketing communications by email or text with your consent, and you can always opt out of receipt of marketing communications by post or telephone.

If you have any questions about your personal information, modification, deletion, portability reports or your rights when it comes to any of the forgoing, contact info@hfma.org.uk or telephone on 0117 929 4789.

Security

HFMA takes security seriously. We take various steps to protect information you provide to us from loss, misuse, and unauthorized access or disclosure. These steps take into account the sensitivity of the information we collect, process and store, and the current state of technology. We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff, volunteers and contractors.

Use of 'cookies'

Our HFMA website and digital platforms use cookies to help with tracking information about how people are using them.

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added, and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web

application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

HFMA will ask you to consent to our use of cookies in accordance with the terms of this policy when you first visit our website OR by using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.

Links to other websites and digital platforms

Our websites and digital platforms may contain links to other websites or digital platforms or recommended suppliers. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. We are not responsible for the privacy practices of these other sites. This privacy policy applies only to information collected on our HFMA's websites and digital platforms.

Transfer of data outside EU jurisdiction

We may, on occasion decide to use the services of a supplier outside the European Economic Area (EEA), which means that your personal information is transferred, processed and stored outside the EEA. You should be aware that, in general, legal protection for personal information in countries outside the EEA may not be equivalent to the level of protection provided in the EEA.

However, we take steps to put in place suitable safeguards to protect your personal information when processed by the supplier such as entering into the European Commission approved standard contractual clauses. By submitting your personal information to us you agree to this transfer, storing or processing at a location outside the EEA.

Retention Policy

HFMA will process personal data in compliance with our data retention policy, in accordance with regulations and legislation.

Your rights as a data subject

At any point whilst HFMA is in possession of or processing your personal data, all data subjects have the following rights:

Right of access – you have the right to request a copy of the information that we hold about you.

Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.

Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.

Right to restriction of processing – where certain conditions apply you have a right to restrict the processing.

Right of portability – you have the right to have the data we hold about you transferred to another organisation.

Right to object – you have the right to object to certain types of processing such as direct marketing.

Right to object to automated processing, including profiling – you also have the right not to be subject to the legal effects of automated processing or profiling.

In the event that HFMA refuses your request under rights of access, we will provide you with a reason as to why, which you have the right to legally challenge.

HFMA at your request can confirm what information it holds about you and how it is processed. You can request the following information:

- Identity and the contact details of the person or organisation (HFMA) that has determined how and why to process your data.
- Contact details of the data protection team/officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of HFMA or a third party such as one of its customers/clients, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority – Information Commissioners Office (ICO).
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the rationale involved, as well as the significance and expected consequences of such processing.

To access what personal data is held, identification will be required.

HFMA will accept the following forms of ID when information on your personal data is requested: a copy of your national Insurance/ID card, driving license, passport, birth certificate and a utility bill not older than three months. A minimum of one piece of photographic ID listed above and a supporting document is required. If HFMA is dissatisfied with the quality of the application, further information may be sought before personal data can be released.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by HFMA or its partners, you have the right to complain to the HFMA CEO. Please either write to the CEO at HFMA, 1 Temple Way, Bristol, BS2 0BU or email to info@hfma.org.uk. If you do not get a response within 30 days, you can complain to the Data Protection Regulator.

Information Commissioner's Office

Head Office
Wycliffe house
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: 0303 123 1113

Our details

If you would like any more information or you have any comments about our privacy policy, please either write to us at Data Protection Team, HFMA, 1 Temple Way, Bristol, BS2 0BU or email to info@hfma.org.uk. We may amend this policy from time to time, in which case we will publish the amended version on our website, and you can ask us for a copy by writing to the above address or by emailing at info@hfma.org.uk.

This policy applies to personal information we hold about individuals. It does not apply to information we hold about companies and other organisations.

Approved by Board of Trustees: 3rd May 2018