Privacy policy for BMA House

Introduction

Welcome to the British Medical Association's privacy notice for BMA House events and conferences (**BMA House**).

The British Medical Association (**BMA**) respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how and why we collect, use and share your personal data and will tell you about your privacy rights, how the law protects you and how to contact us.

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1. Important information and who we are

Purpose of this privacy notice

This privacy notice applies when you visit our website (*www.bmahouse.org.uk*). It also applies when you make a booking for room hire at BMA House, sign up to our newsletter, take part in a survey or contact BMA House for any other purpose (including via social media).

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them. For example, if you are a BMA member the BMA's privacy policy which can be found on the BMA's website (*www.bma.org.uk*) will apply when the BMA collects or processes personal data about you.

Controller

The British Medical Association is the controller and responsible for your personal data (collectively referred to as "**BMA**", "**we**", "**us**" or "**our**" in this privacy notice).

We have appointed a data protection officer (**DPO**) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, please contact the DPO using the details set out below.

Contact details

Our registered office is BMA House, Tavistock Square, London, WC1H 9JP.

If you have any queries relating to how we use your information please contact our DPO:

Name: Joel Henderson

Address: as above

Email address: dpo@bma.org.uk

Tel number: 02030587415

You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact our DPO in the first instance.

Changes to the privacy notice and your duty to inform us of changes

From time to time, we may change our privacy notice. We will post a notice on our website to notify you of any significant changes or update you by other appropriate means.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit (for example to see how they use your information and to find out how to opt out, or delete, such information).

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name and title.
- **Contact Data** includes job title, postal and billing address, email address and telephone number.
- **Financial Data** includes bank account and payment details.

- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased and used from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, services, events and conferences.
- **Marketing and Communications Data** includes your preferences in receiving marketing and other communications from us.

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.

Sensitive personal information (also known as **Special Categories of Personal Data**) is information which relates, for example, to your health, race or religion. We may obtain sensitive personal information about you if you volunteer it during any of your contact with us. For example, you may provide us with dietary requirements which could imply religious preference.

We have additional obligations to treat sensitive personal information with appropriate care, taking into account the nature of that information. The best way to restrict the processing of your sensitive personal data is not to give it to us unless it is necessary for the services you are obtaining from us.

If you fail to provide personal data

Where we need to collect 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 event services). In this case, we may have to cancel an event or service you have with us but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Identity, Contact and Financial Data mentioned above by filling in an event booking form (on our website or in paper form) or by corresponding with us by post, phone, email or otherwise.

Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may

also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy [http://www.bmahouse.org.uk/legal/cookie-policy] for further details.

Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:

- Technical Data from analytics providers such as Google based outside the EU.
- Contact, Financial, Credit and Transaction Data from providers of technical, payment and delivery services.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. This means the interests of our business in conducting and managing our business to enable us to give you the best event/service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data. If we ever need to for a specific purpose we will request consent from you at the time we collect your personal data, however, you will not be obliged to give your consent if you choose not to. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of the ways we use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Legal basis for processing

Client and event booking administration such as: - registering you as a client; - processing your event booking including: (a) managing payments, fees and charges (b) collecting and recovering money	(a) Performance of a contract with you. (b) In our legitimate interests.
owed to us - holding your data on our client and events booking databases; - management and statistical analysis of our databases - confirming your identity when you contact us; - contacting you about your booking - registering and assisting delegates/guests, which may include children (e.g. when attending a wedding)	
To provide you with information, products and services that you request from us or our business partners (such as reception, caterers, audio-visual and technology, flowers, security, porters, taxi etc.). Please also see paragraph 5 below on 'disclosures of your personal data'.	It is in our legitimate interests to respond to your queries and provide any information, products and services requested in order to ensure we offer a good and responsive service and to generate and develop business. We consider this use to be proportionate and will not be prejudicial or detrimental to you.
Sharing your personal data (and those of delegates and guests) with our business partners (as above). Please also see paragraph 5 below on 'disclosures of your personal data'.	(a) Performance of a contract with you. (b) In our legitimate interests (as above).
To send you alerts, newsletters (on a quarterly basis), bulletins, announcements, and other communications concerning BMA House events and services or which we believe may be of interest to you	It is in our legitimate interests to market our services. We consider this use to be proportionate and will not be prejudicial or detrimental to you. You can always opt-out of receiving direct marketingrelated email communications or text messages by following the unsubscribe link.

To invite you to events, conferences or other functions we believe may be of interest to you	It is in our legitimate interests to market our services. We consider this use to be proportionate and will not be prejudicial or detrimental to you. You can always opt-out of receiving direct marketingrelated email communications or text messages by following the unsubscribe link.
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey or participate in market research	(a) Performance of a contract with you (b) To comply with a legal obligation (c) It is in our legitimate interests to keep our records updated and to study how clients use our events and services.
To administer and protect our business and our website (including	(a) It is in our legitimate interests for running our business, provision of administration, IT services and
troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	network security. (b) To comply with a legal obligation.
To deliver relevant website content and measure or understand the effectiveness of the work we do	It is in our legitimate interests to study how clients use our events and services, to develop them, to grow our business and to inform our marketing strategy.
To use data analytics to improve our website, events/services, marketing, client relationships and experiences	It is in our legitimate interests to define types of clients for our events and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy.
To make suggestions and recommendations to you about events or services that may be of interest to you	It is in our legitimate interests to develop our products/services and grow our business. You can always opt-out of receiving direct marketingrelated email communications or text messages by following the unsubscribe link.
To promote BMA House by social media, for example, by using social sharing buttons and links which help share web content	(a) Consent (b) Legitimate interests

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or booked events, purchased products or services from us and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We will not share your data outside the BMA group of companies for marketing purposes without your consent.

Opting out

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time at events@bma.org.uk.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of you becoming a client, booking an event, product/service purchase or experience or other transactions.

Cookies

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. For more information about the cookies we use, please see http://www.bmahouse.org.uk/legal/cookie-policy.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal third parties:

- Other companies in the BMA Group acting as controllers, joint controllers or processors who are a part of providing our events, products and services (such as the BMJ who do our invoicing for us).

- External third parties:
  - Service providers acting as processors who assist in the operation of BMA House and in the provision of services such as our events booking system, data cleansing, IT and system administration and support services, data storage, hosting and back up services, back office functions and mailing houses.
  - Business partners and others acting as processors, joint controllers or controllers in their own right who provide some of our events services and products such as reception, catering, audio-visual, security, porters, cleaners etc. and alternative venues should they be required.
  - Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
  - HM Revenue & Customs, regulators (such as the ICO) and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
  - Market research and customer satisfaction survey providers acting as processors who help to develop and improve our services.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party data processors and service providers to use your personal data (which we have shared with them) for their own purposes and only permit them to process such personal data for specified purposes and in accordance with our instructions.

Please note, if you purchase a product or service directly from our business partners or others you will become a client of theirs and will have a direct relationship with them. This means that they will be responsible for the personal data they collect from you and for informing you of their use of your personal data.

6. International transfers

We may transfer your personal data to countries outside the European Economic Area (**EEA**). This may include circumstances where we use service providers who are based outside the EEA or who use “cloud” infrastructure which means that their servers could be based overseas. We understand our obligation to protect your personal data and consider carefully the appropriateness of these services.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.

- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

Please contact us http://www.bmahouse.org.uk/legal/cookie-policy if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7. Data security

We understand that the security of your information is important to you. 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 use industry standard physical and procedural security measures to protect information from the point of collection to the point of destruction. This includes encryption, firewalls, access controls, policies and other procedures to protect information from unauthorised access.

Where data processing is carried out on our behalf by a third party, we take steps to ensure that appropriate security measures are in place to prevent unauthorised disclosure of personal data.

In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

Despite these precautions, however, we cannot guarantee the security of information transmitted over the internet or that unauthorised persons will not obtain access to personal data. 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.

8. Data retention

How long will you use my personal data for?

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.

The criteria we use for retaining different types of personal data, includes the following:

- General queries - when you make an enquiry or contact us by post, email or telephone, we will retain your information for as long as necessary to respond to your queries. After this period, we will not hold your personal data for longer than five (5) years if we have not had any active subsequent contact with you.

- Direct marketing - where we hold your personal data on our database for direct marketing purposes, we will retain your information for no longer than five (5) years if we have not had any active subsequent contact with you.

- Legal and regulatory requirements - we may need to retain personal data for up to seven (7) years after we cease providing events services and products to you, where necessary, to comply with our legal obligations, resolve disputes or enforce our terms and conditions.

- Delegates/guests – we retain delegate/guest lists for no longer than three (3) months.

In some circumstances you can ask us to delete your data: see ‘request erasure’ below for further information.

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.

9. Your legal rights

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a **legitimate interest** (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also

have the right to object where we are processing your personal data for **direct marketing** purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact the Head of Records & Archives, Records & Archives Department by email at: *infodesk@bma.org.uk* or by post to: BMA House, Tavistock Square, London, WC1H 9JP.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

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.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.