

BABCP PRIVACY POLICY

This policy sets out how BABCP (“the Association”) will treat personal information of visitors to and/or users of the main Association website, CBT Café and online CBT Register UK (“online services”).

INFORMATION COLLECTED BY BABCP

BABCP may collect, store and use the following kinds of personal information:

- Information about your computer and about your visits to and use of the online services (this may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views, website navigation).
- Information that you provide for the purpose of registering to the BABCP’s online services and email notification.
- Any other information that you choose to send to us, including information relating to any transactions or updates carried out between you and BABCP on or in relation to online services.

COOKIES

A cookie is a message given to a web browser by a web server. The browser stores the message in a text file. The message is then sent back to the server each time the browser requests a page from the server.

The Association’s online services may use both session and/or persistent cookies.

Session cookies will be used to keep track of you whilst you navigate the Association’s online services; they will be deleted from your computer when you close your browser.

Persistent cookies will be used to enable the Association’s online services to recognise you when you visit; they will remain stored on your computer until deleted, or until they reach a specified expiry date.

Google Analytics will be used to analyse the use of the Association’s online services. Google Analytics generates statistical and other information about use of online services by means of cookies, which are stored on users’ computers. Reports are created about the use of the Association’s online services by the information Google Analytics generates. Google will store this information. Google’s privacy policy can be viewed at www.google.com/policies/privacy.

By adjusting the settings of your browser, you can choose to accept or refuse cookies from the websites that you visit. You can also decide to be informed when a cookie is about to be placed on your computer. Please consult your browser’s website for details on how to

disable cookies. If you choose to block all cookies, this will have a negative impact upon the usability of many websites, including the Association's online services.

HOW BABCP USES PERSONAL INFORMATION

Personal information submitted via the Association's online services will be used for the purposes specified in this privacy policy or in relevant parts of these online services.

BABCP may use your personal information to:

- administer the Association's online services;
- improve your browsing experience;
- enable your use of the services available via the Association's online services;
- supply you with goods and services purchased via the Association's online services;
- send statements and invoices to you and collect payments from you;
- send you communications relating to BABCP or the businesses of carefully-selected third parties which we think may be of interest to you by post or, where you have specifically agreed to this, by email or similar technology - you can inform us at any time if you no longer require marketing communications;
- provide third parties with statistical information about our users (this information will not be used to identify any individual user);
- handle enquiries and complaints made by or about you relating to the Association's online services;
- update the Association's membership database systems where provided by the user; and,
- maintain and display the Association's membership directories and registers in public and secure areas of the online services as prescribed and authorised by the governance policies and rules of the Association, and only where BABCP members have consented or subscribed in advance.

Where personal information is submitted for publication on the Association's online services, this information will be published and otherwise used in accordance with the licence you grant to the Association.

We will not without your express consent provide your personal information to any third parties for the purpose of direct marketing.

All the Association's online financial transactions are handled through SagePay. SagePay's privacy policy can be viewed at www.sagepay.com/privacy_policy.

BABCP will share information with SagePay as appropriate to the transaction being carried out only to the extent necessary for the purposes of processing payments you make via the Association's online services and dealing with queries relating to such payments.

DISCLOSURES

BABCP may disclose information about you to any of our paid or elected officers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes as set out in this privacy policy.

In addition, BABCP may disclose your personal information:

- to the extent that BABCP is required to do so by law;
- in connection with any legal proceedings or prospective legal proceedings;
- in order to establish, exercise or defend the Association's legal rights (this includes providing information to third parties for the purposes of fraud prevention and reducing credit risk).

Except as provided in this privacy policy, BABCP will not provide third parties with your information.

INFORMATION SECURITY

BABCP will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

All the personal information you provide will be stored on the Association's secure servers. These servers are password- and firewall- protected. All electronic transactions containing personal details that you make to or receive from BABCP will be encrypted using SSL technology.

It should be noted that data transmission over the internet is inherently insecure, and as such BABCP cannot guarantee the security of data sent over the internet.

You are responsible for keeping your password and user details confidential. BABCP will not ask you for your password (except when you log in to the Association's online services).

POLICY UPDATES

BABCP reserves the right to update this privacy policy from time-to-time and post a new version on the Association's online services. This page should be checked occasionally to ensure you are aware and content with any changes.

BABCP may also notify you of changes to the privacy policy by email.

YOUR RIGHTS

You may instruct BABCP to provide you with any personal information the Association holds about you. Providing this information will be subject to:

- payment of a fee (currently fixed at £10.00); and,
- supplying appropriate evidence of your identity (for this purpose, BABCP will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address, or confirmation of the address and membership number of a fully paid up member of the Association).

BABCP may withhold such personal information to the extent permitted by law.

You may instruct BABCP not to process your personal information for marketing purposes. This will normally be expressly agreed by you in advance to the Association's use of your personal information for marketing purposes, or you will be provided with an opportunity to opt-in to the use of your personal information for marketing purposes.

THIRD PARTY WEBSITES

The Association's online services contain links to third party websites. BABCP is not responsible for the privacy policies or practices of these websites.

UPDATING YOUR INFORMATION

It is your responsibility to inform BABCP if the personal information which the Association holds about you needs to be corrected or updated.

CONTACT INFORMATION

If you have any questions about this privacy policy or the Association's treatment of your personal information, write to BABCP, Imperial House, Hornby Street, Bury, Lancashire BL9 5BN.

DATA CONTROLLER

BABCP is the data controller responsible in respect of the information collected via the Association's online services. The Association's data protection registration number is Z2099736.

(APPROVED BY THE BABCP BOARD, 23 APRIL 2012)