

WEBSITE PRIVACY NOTICE AND COOKIES POLICY

This privacy notice provides details of how we collect and process your personal data through your use of our site <https://companyofnurses.co.uk>

About us

The Company of Nurses (the Company) is a Company of the City of London. Our charitable arm is the Company of Nurses Charitable Trust (the Trust) which is registered with the Charity Commission (Reg. No. 1170982).

For the purposes of data protection legislation, the Company is the "data controller" which means that the Master, Wardens and Court of Assistants are ultimately responsible for how the Trust uses and stores your personal data. In this notice "we" is a reference to the Company and the Trust.

The Honorary Clerk is the person responsible for ensuring that the requirements of data protection legislation are complied with. He may be contacted by e-mail at honoraryclerk@companyofnurses.co.uk, or by writing to him at The Company of Nurses, Apothecaries' Hall, Black Friars Lane, London EC4V 6EJ.

The personal data we hold about you

'Personal data' is information that identifies you as an individual and relates to you. It does not include anonymised data.

We may process the following categories of personal data about you:

- **Communication Data** that includes any communication that you send to us whether that be through the contact form on our website, through email, text, social media messaging, social media posting or any other communication that you send us.
- **Membership Data** that includes data provided by you when applying for membership, viz. your name; home address; contact telephone numbers; e-mail address; date of birth; nursing qualifications; place of training; NMC Pin number; current role; and membership of other Companies or Livery Companies.
- **User Data** that includes data about how you use our website and any online services together with any data that you post for publication on our website or through other online services.
- **Technical Data** that includes data about your use of our website and online services such as your IP address, details about your browser, length of visit to pages on our website, page views and navigation paths, details about the number of times you use our website, time zone settings and other technology on the devices you use to access our website. The source of this data is from our analytics tracking system.

How we use your personal data

The personal data about you that we process is used for the following purposes.

- to communicate with you, and for record keeping;
- to process your application for membership;
- to operate our website and ensure relevant content is provided to you, to ensure the security of our website, to maintain back-ups of our website and/or databases and to enable publication and administration of our website, and other online services.
- to analyse your use of our website and other online services, to administer and protect our website, and to deliver relevant website content to you.

How we contact you

You may be contacted for any or all of the above purposes by email, telephone, post or by text message, but only where this is permitted under data protection legislation. If you tell us that you do not want to be contacted by one or other of these means, we will of course respect that.

Who we share your data with

We share your details with other members of the Company, but never with anyone seeking to contact you who is not a member of the Company without your consent.

We may share your information with trusted third parties to help us perform certain tasks that we do not have the capacity or expertise to do in house. They only use your data for our specified purposes and do not share it with anyone else.

We use IT consultants who might access information about you when repairing or checking the security of our IT systems. We also use third party 'cloud computing' services to store your information, rather than store it on hard drives.

We share donors' information with the Charities Commission in the Trustees' annual report. If you have made a Gift Aid declaration, we share your details with HMRC, so that we can claim Gift Aid on your donation.

In accordance with our legal obligations we may share your personal information with the police or other authorities as the need arises.

The information we share will be strictly limited to the personal data required for each task.

We never sell, rent or share your personal data with any third parties for marketing purposes.

How we keep your data safe

We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation.

Those third parties who we share your data with are required to give an undertaking that their systems are compliant with the General Data Protection Regulation, that your data will be kept secure, and that it will be destroyed, as soon as the purpose for which it has been shared is fulfilled.

Third parties outside of the EU that we use include; Google Drive and Dropbox, Mailchimp for our emails and newsletters and Highrise for our members database. All of these are certified as protecting personal data under the EU/US Privacy Shield.

How long we keep your information

If you apply to join the Company and your application is accepted, all the personal information you provided us with at the time will be retained until such time as you resign from the Company. Thereafter only your name, address and date of admission to the Freedom will be retained for historical and research purposes.

We will keep copies of other written or electronic communications from you for at least 12 months. Thereafter, we may destroy or archive the material.

Our lawful grounds for using your information

This section contains information about the lawful grounds that we rely upon when handling your information.

Legitimate interests

This means that the processing is necessary for legitimate interests, except where the processing is unfair to you. Specifically, we have a legitimate interest in ensuring that we process applications for membership; reply to communications sent to us; keep proper records; and properly administer our website.

If you object to us using your information where we are relying on our legitimate interests, as explained above, please contact the Honorary Clerk.

Legal obligation

On occasions we may need your information to comply with a legal obligation. For example, we may need to keep a record of who is attending an event so that we can comply with our health and safety obligations.

What action we take if your data is breached

Whilst every effort is taken to protect your data, breaches can arise. A personal data breach can be broadly defined as a security incident that has affected the confidentiality, integrity or availability of personal data. for example, if someone accesses the data or passes it on without proper authorisation; or if the data is made unavailable due to it being encrypted by ransomware, or accidentally lost or destroyed. In that event, we will take remedial action as a matter of urgency. In serious case we are obliged to notify the Information Commissioner's Office within 72 hours of discovering the breach.

We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach, if we are legally required to.

If you are worried that your personal data has been compromised, and you believe this may be due to some action on the part of the Company, you should draw this to the attention of the Honorary Clerk as soon as possible, in order that it can be properly investigated.

Your legal rights

New data protection legislation gives you a number of rights regarding your information. Some of these are new rights, whilst others build on your existing rights.

Your rights are as follows:

- if information is incorrect you can ask us to correct it; in that event, we can only use it for limited purposes while we check its accuracy;
- you can ask what information we hold about you and be provided with a copy;
- you can ask us to delete the information that we hold about you;
- you can ask us to send you, or another organisation, certain types of information about you in a format that can be read by a computer;
- you can ask for us to stop processing your data

If you wish to exercise any of the rights set out above, please email us at honoraryclerk@companyofnurses.co.uk explaining what action you want us to take and the reasons for doing so.

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 or refuse to comply with your request in these circumstances.

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.

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.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would be grateful, however, if you would contact us in the first instance, so that we can try to resolve your complaint for you.

Third Party Links

This 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.

Cookies Policy

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.

What is a cookie?

A "cookie" is a piece of information that is stored on your computer's hard drive and which records how you move your way around a website so that, when you revisit that website, it can present tailored options based on the information stored about your last visit.

Cookies are used by nearly all websites and do not harm your system.

If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings. You can block cookies at any time by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

How do we use cookies?

We use cookies to track your use of our website. This enables us to understand how you use the site and track any patterns with regards how you are using our website. This helps us to develop and improve our website.

Cookies are either:

- Session cookies: these are only stored on your computer during your web session and are automatically deleted when you close your browser – they usually store an anonymous session ID allowing you to browse a website without having to log in to each page, but they do not collect any personal data from your computer; or
- Persistent cookies: a persistent cookie is stored as a file on your computer and it remains there when you close your web browser. The cookie can be read by the website that created it when you visit that website again. We use persistent cookies for Google Analytics.

Cookies can also be categorised as follows:

- Strictly necessary cookies: These cookies are essential to enable you to use the website effectively, such as when enter the Freeman's Only area and therefore these cannot be turned off. Without these cookies, the services available to you on our website cannot be provided. These cookies do not gather information about you that could be used for marketing or remembering where you have been on the internet.
- Performance cookies: These cookies enable us to monitor and improve the performance of our website. For example, they allow us to count visits, identify traffic sources and see which parts of the site are most popular.