



## Privacy Policy

This website and all other ENOTHE literature are owned and operated by the European Network of Occupational Therapy in Higher Education (ENOTHE), a non-governmental organisation registered under Austrian Law. The organisation's address is Holmeistergasse 7 9 /2/1, A - 1210, Austria.

### 1. Introduction

ENOTHE is committed to protecting your personal information and respecting your privacy. This Privacy Policy sets out the basis on which any personal data that we collect from or about you, or that you provide to us, will be processed by us. For the purpose of General Data Protection Regulation (the GDPR) the data controller is ENOTHE. We may update the Privacy Policy from time to time. Any changes we make in the future will be posted on our website [www.enothe.eu](http://www.enothe.eu)

### 2. Data Protection Contact

The contact details of our administrator for any data protection queries is as follows: Email: [info@enothe.eu](mailto:info@enothe.eu)

### 3. Data Protection Principles

We will comply with data protection law. This says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way
- Collected only for valid purposes that we have clearly explained to you and not used in any other way that is incompatible with those purposes
- Relevant to the purposes that we have told you about and limited only to those purposes
- Accurate and kept up to date
- Kept only for one year for the purposes we have told you about and then deleted from our systems
- Kept securely



#### **4. Particulars of Processing**

We process personal data about prospective members who join as institutions and individuals and use the on-line shop, teachers, students and practitioners who submit newsletter articles, project proposals, abstracts, keynote speakers who attend the ENOTHE Annual Meetings which are held each year.

#### **5. Your Rights as a Data Subject**

The General Data Protection Regulation provides the following rights (subject to some exemptions):

- The right to request access to the personal data that we hold about you
- The right to request rectification of the personal data that we hold about you
- The right to request erasure of the personal data that we hold about you
- The right to request restriction of processing about you
- The right to object to processing
- The right to data portability
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If at any point you believe the information, we process on you is incorrect, incomplete or out of date then please let us know and we will make sure that your data is corrected. If you wish to raise a complaint on how we have handled your personal data, you can contact the Administrator using the contact details above. If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law you can complain to the Information Commissioner's Office.

#### **6. How we will use the information about you**

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

- Where we need to perform the contract, we have entered into with you
- Where we need to comply with legal obligation
- 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

We may also use your personal information in the following situations, which are likely to be rare:



- Where we need to protect your interests (or someone else's interests)
- Where it is needed in the public interest or for official purposes

We will generally process your personal data for contractual necessity in providing Annual Meeting registration event purposes and those who wish to become individual ENOTHE members. We may also use personal information for additional relevant and related purposes where you might reasonably expect us to do so, where the benefits of doing so are not outweighed by your own interests or fundamental rights or freedoms. This may include:

- To maintain our records and other administrative purposes, including updating your details and preferences
- Your Annual Meeting registration information will only be kept for one year and then deleted from our systems
- To assist with queries, complaints and dispute resolution
- Communications related to Annual Meetings or similar events to assist in evaluations
- To assist with upholding our Association Constitution and taking action in cases where there has been a breach of rules or code of ethics

We will ask your direct consent if we intend to use your personal data for marketing purposes. Where the processing of personal data is based on your having given consent, you have the right as a data subject to withdraw that consent at any time. If you wish to invoke this right, please notify the Administrator using the contact details above.

You have a right to lodge a complaint with a supervisory authority the Office of Information Commissioner.

## **7. Recipients of Data**

We may use service providers to help us provide you with our services. Personal data may be transferred to such a service provider, who will act for or on our behalf, for further processing in accordance with the purpose(s) for which the data were originally collected or may otherwise be lawfully processed.

Such third parties have contracted with us as data processors under the requirements in the GDPR. They are contractually bound to only use the personal data for the agreed purpose(s). Relevant persons working for these third parties will have access to your personal data under the terms of the data



processor contract, but only to the extent necessary to perform their services for us.

These data processors agree to implement reasonable contractual and technical protections, to keep your data confidential, not sell your personal data to third parties and not to disclose your personal data to third parties except as may be required by law, as permitted by us or stated in this Privacy Policy. In appropriate circumstances we may disclose data to authorised bodies as required by law.



## ANNEX 1

This annex sets out ENOTHE’s processing of personal data relating to prospective members who join as institutions and individuals and use the on-line shop, teachers, students and practitioners who submit newsletter articles, project proposals, abstracts, keynote speakers who attend the ENOTHE Annual Meetings which are held each year.

### What personal data do we process?

- Name
- Address
- Email address
- Telephone number
- Payment details

### Where do we obtain your personal data from?

Most of the above personal data is received direct from you (the data subject). However, information may be received from third parties (e.g. the ENOTHE Bank or the Stripe Secure system for processing credit card payments).

### Why do we process your personal data and what is the lawful basis?

We process your personal data for the following purposes:

<b>Members and Prospective Members</b>	
<ul style="list-style-type: none"> <li>• List of personal data processed:</li> <li>• Name</li> <li>• Address</li> <li>• Telephone numbers</li> <li>• Email address</li> <li>• Specialist Interests</li> <li>• Bank information for payment of membership and registration to attend Annual Meetings</li> </ul>	
<b>Purpose</b>	<b>Lawful Basis</b>
Provision of membership services including administration and	Contractual Necessity



transactional communications relating to membership	
Upholding the Association Constitution and rules	Contractual Necessity
Contacting you, by either email, letter or telephone regarding an event or meeting for which you have requested information or submitted and registration form or application	Contractual Necessity
Contacting you, by either email, letter, regarding newsletters, invitations and information about ENOTHE events or meetings	Legitimate Interest
Distribution of newsletters	Legitimate Interest
Publication of information of current members list	Consent
<b>Abstract submissions, project proposals, registrations for attendance at annual meetings, payment of expenses, programme booklet and the abstract book</b>	
List of personal data processed <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Telephone numbers</li> <li>• Email addresses</li> <li>• Bank details</li> <li>• Dietary requirements</li> </ul>	
<b>Purpose</b>	<b>Lawful Basis</b>
Administration and transactional communications	Contractual Necessity
Provision of services related to our events	Contractual Necessity
Upholding the Association Constitution and rules	Contractual Necessity
Contacting you, by either email, letter or telephone, regarding future events	Legitimate Interest
Publication of your name in programme book, abstract book and attendance list	Legitimate Interest
<b>Customers to the on-line shop</b>	



List of personal data processed Name Address Telephone numbers Email address Payment details – bank card information	
<b>Purpose</b>	<b>Lawful Basis</b>
Administration and transactional communications relating to purchases made	Contractual Necessity

We also process personal data for the Association’s legitimate interests as we have outline in the main Privacy Policy. Please be assured that we will always take account of your personal data rights in doing so.

**Where do we obtain your personal data from?**

Most of the personal data received is directly from you (the data subject). However, information may be received from third parties, e.g. the ENOTHE Bank or the Stripe Secure Payments system.

**How long do we hold your personal data?**

Personal data will be retained in accordance with statutory requirements and the Associations Data Retention Policy which is available on request.

Are you obliged to provide us with your personal data?

You are not obliged to provide the personal data in question. However, if you do not provide the personal data, we will be unable to perform any contract we have with you for the provision of membership services or registration to the annual meeting events or payment of expenses.

Recipients of your personal data

We disclose data to the following outsourced data processors, in line with section 5 of our main Privacy Policy, for the purposes of:



<b>Data Recipient</b>	<b>Purpose</b>
ENOTHE Bank account	Administration of direct payment transactions outgoing and incoming
Stripe secure system	Administration of secure card payments and refunds
Web Cookies	Please refer to Cookies Policy

Any financial data arising from a transaction process will be held securely by the ENOTHE Association Bank and complies with Austrian Finance Law.

Sources:

Council of Occupational Therapists European Countries

<http://www.coteceurope.eu/home/privacy-policy/>

European Commission. 2018 Commission reform of EU data protection rules

[https://ec.europa.eu/commission/priorities/justice-and-fundamental-rights/data-protection/2018-reform-eu-data-protection-rules\\_en](https://ec.europa.eu/commission/priorities/justice-and-fundamental-rights/data-protection/2018-reform-eu-data-protection-rules_en)

European Union General Data Protection Regulation 2018 <https://eugdpr.org/>

<http://www.thekennelclub.org.uk/privacy.policy>

World Federation of Occupational Therapists

<http://www.wfot.org/PrivacyDisclaimer.aspx>

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