



## PATOSS Privacy Notice

### **Who we are**

Patoss is the Professional Association of Teachers of Students with Specific Learning Difficulties. Our mission is to help people with Specific Learning Difficulties (SpLD) succeed in their education and workplace by nourishing the professionals who teach, assess and support them. We are a non-profit company limited by guarantee.

### **How we use your personal information**

This privacy notice is to let you know how we promise to look after your personal information. This includes what you tell us about yourself, what we learn by having you as a client, and the choices you give us about what marketing you want us to send you. This notice explains how we do this and tells you about your privacy rights and how the law protects you.

### **Our Privacy Promise**

We promise:

- To keep your data safe and private.
- Not to sell your data.
- To give you ways to manage and review your marketing choices at any time.

If you have any questions, or want more details about how we use your personal information, you can ask us.

### **How the law protects you.**

As well as our Privacy Promise, your privacy is protected by law. This section explains how that works.

Data Protection law says that we are allowed to use personal information only if we have a proper reason to do so. This includes sharing it outside Patoss Ltd. The law says we must have one or more of these reasons:

- To fulfil a contract we have with you, or
- When it is our legal duty, or
- When it is in our legitimate interest, or
- When you consent to it.

A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell you what that is.

Here is a list of all the ways that we may use your personal information, and which of the reasons we rely on to do so. This is also where we tell you what our legitimate interests are.

### **What we use your personal information for**

- To manage our relationship with you or your business.
- To develop new ways to meet our clients' needs and to grow our business.
- To develop and carry out marketing activities.
- To study how our clients use services and products from us and other organisations.
- To provide advice or guidance about our services and products.

- To develop and manage our brands, services and products.
- To test new products.
- To manage how we work with other companies that provide services to us and our clients.

### **Our reasons**

- Fulfilling contracts.
- Your consent.
- Our legitimate interests.
- Our legal duty.

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### **Our legitimate interests**

- Keeping our records up to date, working out which of our services and products may interest you and telling you about them.
  - Developing services and products, and what we charge for them.
  - Defining types of clients for new services or products.
  - Seeking your consent when we need it to contact you.
  - Being efficient about how we fulfil our legal duties.
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- Developing services and products, and what we charge for them.
  - Defining types of clients for new services or products.
  - Being efficient about how we fulfil our legal and contractual duties.

<b>What we use your personal information for</b>	<b>Our reasons</b>	<b>Our legitimate interests</b>
<ul style="list-style-type: none"> <li>• To deliver of our services and products.</li> <li>• To make and manage client payments.</li> <li>• To manage fees, charges and interest due on client accounts.</li> <li>• To collect and recover money that is owed to us.</li> <li>• To manage and provide treasury and investment services and products.</li>   <li>• To detect, investigate, report, and seek to prevent financial crime.</li> <li>• To manage risk for us and our clients.</li> <li>• To obey laws and regulations that apply to us.</li> <li>• To respond to complaints and seek to resolve them.</li> </ul>	<ul style="list-style-type: none"> <li>• Fulfilling contracts.</li> <li>• Our legitimate interests.</li> <li>• Our legal duty.</li> </ul>	<ul style="list-style-type: none"> <li>• Being efficient about how we fulfil our legal and contractual duties.</li> <li>• Complying with regulations that apply to us.</li> </ul>
<ul style="list-style-type: none"> <li>• To detect, investigate, report, and seek to prevent financial crime.</li> <li>• To manage risk for us and our clients.</li> <li>• To obey laws and regulations that apply to us.</li> <li>• To respond to complaints and seek to resolve them.</li> </ul>	<ul style="list-style-type: none"> <li>• Fulfilling contracts.</li> <li>• Our legitimate interests.</li> <li>• Our legal duty.</li> </ul>	<ul style="list-style-type: none"> <li>• Developing and improving how we deal with financial crime, as well as doing our legal duties in this respect.</li> <li>• Complying with regulations that apply to us.</li> <li>• Being efficient about how we fulfil our legal and contractual duties.</li> </ul>
<ul style="list-style-type: none"> <li>• To run our business in an efficient and proper way. This includes managing our financial position, business capability, planning, communications, corporate governance, and audit.</li> </ul>	<ul style="list-style-type: none"> <li>• Our legitimate interests.</li> <li>• Our legal duty.</li> </ul>	<ul style="list-style-type: none"> <li>• Complying with regulations that apply to us.</li> <li>• Being efficient about how we fulfil our legal and contractual duties.</li> </ul>

What we use your personal information for	Our reasons	Our legitimate interests
<ul style="list-style-type: none"> <li>To exercise our rights set out in agreements or contracts.</li> </ul>	<ul style="list-style-type: none"> <li>Fulfilling contracts.</li> </ul>	

### Groups of Personal Information

We use many kinds of personal information, and group them together like this.

Type of personal information	Description
Transactional	Details about payments to and from your accounts with us.
Contractual	Details about the services or products we provide to you.
Contact	Where you live and how to contact you.
Socio-Demographic	This includes details about your work or profession, education and where you fit into general social or income groupings.
Behavioural	Details about how you use our services and products.
Technical	Details on the devices and technology you use.
Communications	What we learn about you from letters, emails and conversations between us.
Open Data and Public Records	Details about you that are in public records, such as information about you that is openly available on the internet.

Type of personal information	Description
Usage Data	Other data about how you use our services and products.
Documentary Data	Details about you that are stored in documents in different formats, or copies of them. This could include things like your passport, drivers licence or birth certificate.
Special types of data	<p>The law and other regulations treat some types of personal information as special. We will only collect and use these types of data if the law allows us to do so:</p> <ul style="list-style-type: none"> <li>• Racial or ethnic origin</li> <li>• Religious or philosophical beliefs</li> <li>• Trade union membership</li> <li>• Genetic and bio-metric data</li> <li>• Health data including gender</li> <li>• Criminal convictions and offences</li> </ul>
Consents	Any permissions, consents or preferences that you give us. This includes things like how you want us to contact you.

### Where we collect personal information from

We may collect personal information about you from these sources:

Data you give to us:

- When you apply for our services and products
- When you talk to us on the phone or at events
- When you use our website or other services
- In emails and letters
- In certification or other documents
- In financial reviews and interviews
- In client surveys
- If you take part in our promotions or competitions.

Data we collect when you use our services. This includes the amount, frequency, type, location, origin and recipients:

- Payment and transaction data.
- Profile and usage data. This includes the profile you create to identify yourself when you connect to our internet services. It also includes other data about how you use those services. We gather this data from devices you use to connect to those services, such as computers and mobile phones, using cookies and other internet tracking software.

Data from third parties we work with:

- Companies or individuals that introduce you to us
- Insurers
- Comparison websites
- Regulatory and audit agencies
- Fraud prevention agencies
- Payroll service providers
- Public information sources such as Companies House
- Agents working on our behalf
- Social networks
- Market researchers
- Government and law enforcement agencies.

Who we share your personal information with

We may share your personal information with these organisations:

- Agents and advisers who we use to help run your accounts and services, collect what you owe, and explore new ways of doing business
- HM Revenue & Customs, regulators and other authorities
- Credit reference agencies
- Regulatory and audit agencies
- Fraud prevention agencies
- Any party linked with you or your business's products or services
- Companies we have a joint venture or agreement to co-operate with
- Organisations that introduce you to us
- Companies that we introduce you to
- Market researchers
- Companies you ask us to share your data with.



We may need to share your personal information with other organisations to provide you with the product or service you have chosen:

- If you use direct debits, we will share your data with the Direct Debit scheme.
- If you apply for insurance through us, we may pass your personal or business details to the insurer, and onto any reinsurers.
- If you make an insurance claim, information you give to us or the insurer may be put on a register of claims. This will be shared with other insurers.
- If you hold professional membership, or professional certification we may confirm this with DSA-QAG, DSA NMH providers or SASC [the SpLD Assessment Standards Committee],\* have a secured loan or mortgage with us, we may share information with other lenders who also hold a charge on the property.

\*We will not supply personal details such as address, contact information unless you give us consent to do so.

We may also share your personal information if the make-up of Patoss Ltd changes in the future:

- We may choose to sell, transfer, or merge parts of our business, or our assets. Or we may seek to acquire other businesses or merge with them.
- During any such process, we may share your data with other parties. We'll only do this if they agree to keep your data safe and private.
- If the change to our company happens, then other parties may use your data in the same way as set out in this notice.

### **The information we use**

These are some of the kinds of personal information that we use:

- Name
- Residential address
- Contact details, such as email addresses and phone numbers
- Data relating to your or your business's services or products
- Employment details
- Professional qualifications
- Logs of continuing professional development
- Data that identifies computers or other devices you use to connect to the internet. This includes your Internet Protocol (IP) address.

### **If you choose not to give personal information**

We may need to collect personal information by law, or under the terms of a contract we have with you.



If you choose not to give us this personal information, it may delay or prevent us from meeting our obligations. It may also mean that we cannot perform services needed to run your accounts. It could mean that we cancel a service or product you have with us.

Any data collection that is optional would be made clear at the point of collection.

## **Marketing**

We may use your personal information to tell you about relevant products and offers. This is what we mean when we talk about 'marketing'.

The personal information we have for you is made up of what you tell us, and data we collect when you use our services, or from third parties we work with.

We study this 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 services, products and offers may be relevant for you.

We can only use your personal information to send you marketing messages if we have either your consent or a 'legitimate interest'. That is when we have a business or commercial reason to use your information. It must not unfairly go against what is right and best for you.

You can ask us to stop sending you marketing messages by contacting us at any time.

Whatever you choose, you'll still receive information on your membership and professional certification, and other important information such as changes to your existing services and products.

We may ask you to confirm or update your choices, if you take out any new services or products with us in future. We will also ask you to do this if there are changes in the law, regulation, or the structure of our business.

If you change your mind you can update your choices at any time by contacting us through [info@patoss-dyslexia.org](mailto:info@patoss-dyslexia.org).

## **How long we keep your personal information**

We will keep your personal information for as long as you are a member and or client of Patoss Ltd.

After you stop being a member or client, we may keep your data for up to 10 years for one of these reasons:

- To respond to any questions or complaints.
- To show that we treated you fairly.
- To maintain records according to rules that apply to us.

We may keep your data for longer than 10 years if we cannot delete it for legal, regulatory or technical reasons. We may also keep it for research or statistical

purposes. If we do, we will make sure that your privacy is protected and only use it for those purposes.

### **How to get a copy of your personal information**

You can access your personal information we hold by filling in this form or by writing to us at this address: Patoss Ltd, PO Box 10, Evesham Worcestershire WR11 1ZW.

### **Letting us know if your personal information is incorrect**

You have the right to question any information we have about you that you think is wrong or incomplete. Please contact us if you want to do this.

If you do, we will take reasonable steps to check its accuracy and correct it.

### **What if you want us to stop using your personal information?**

You have the right to object to our use of your personal information, or to ask us to delete, remove, or stop using your personal information if there is no need for us to keep it. This is known as the 'right to object' and 'right to erasure', or the 'right to be forgotten'.

There may be legal or other official reasons why we need to keep or use your data. But please tell us if you think that we should not be using it.

We may sometimes be able to restrict the use of your data. This means that it can only be used for certain things, such as legal claims or to exercise legal rights. In this situation, we would not use or share your information in other ways while it is restricted.

You can ask us to restrict the use of your personal information if:

- It is not accurate.
- It has been used unlawfully but you don't want us to delete it.
- It not relevant any more, but you want us to keep it for use in legal claims.
- You have already asked us to stop using your data but you are waiting for us to tell you if we are allowed to keep on using it.

If you want to object to how we use your data, or ask us to delete it or restrict how we use it or, please contact us.

### **How to withdraw your consent**

You can withdraw your consent at any time. Please contact us if you want to do so.

If you withdraw your consent, we may not be able to provide certain services or products to you. If this is so, we will tell you.

### **How to complain**

Please let us know if you are unhappy with how we have used your personal information. You can contact us using our secure online contact form.



You also have the right to complain to the Information Commissioner's Office. Find out on their website how to report a concern.

### **Formats for sharing data**

From 25 May 2018 you will have the right to get your personal information from us in a format that can be easily re-used.

You can also ask us to pass on your personal information in this format to other organisations.

### **Further information**

This Privacy Notice will be kept under review and will be formally reviewed on a yearly basis. This Privacy Notice was last updated in May 2018.

If you have any questions regarding this privacy notice please do not hesitate to contact us.

We are always working to improve the way your data is stored and shared.