



Empsy®

Empowerment Psychology <http://www.empsy.com>

Empsy® Privacy Policy

1. Introduction

Privacy Policy & GDPR

Here at Empsy® we are proud to provide services that are accessible and easy to understand, and we strive for the highest level of clarity in the policies that govern our service.

As you may be aware, the European Union's General Data Protection Regulation (GDPR) is enforced on 25 May 2018 as a step forward in holding service providers accountable for how they store and use your personal data in the European Union, and we have taken this opportunity to review our practices for everyone. Most of our policies are already aligned with the GDPR's requirements; we demonstrate this by publishing our Privacy Policy here on our website.

1.1 We are committed to safeguarding the privacy of our website visitors and the Network members and service users.

1.2 This policy applies where we are acting as a data controller with respect to the personal data of our website visitors, Network members and service users; in other words, where we determine the purposes and means of the processing of that personal data.

1.3 In this policy, "we", "us" and "our" refer to our data controller. [For more information about us, see Section 13.]

2. Source of information

2.1 For further information on GDPR see <https://www.eugdpr.org/> or <https://ico.org.uk/>

3. How we use your personal data

3.1 In this Section we have set out:

- (a) The general categories of personal data that we may process;
- (b) In the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
- (c) The purposes for which we may process personal data; and
- (d) The legal bases of the processing

3.2 We may process your account data. The account data may include your name and email address. The source of the account data is you or your employer. The account data may be processed for the purposes of operating our website, providing our services (including this website which is part of our service for the Network members), ensuring the security of our services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business or the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

3.3 We may process your information included in your personal profile on our website (“profile data”). The profile data may include your name, address, telephone number, email address, profile pictures, gender, date of birth, relationship status, interests and hobbies, educational details and employment details. The profile data may be processed for the purposes of enabling and monitoring your use of our services. The legal basis for this processing is our legitimate interests, namely the proper administration of our business or the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

3.4 We may process your personal data that are provided in the course of the use of our services (“service data”). The source of the service data is you or your employer. The service data may be processed for the purposes of providing our services, ensuring the security of our services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our business and/or the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

3.5 We may process information that you post for publication on our website (e.g. the member listing) or through our services (“publication data”). The publication data may be processed for the purposes of enabling such publication and administering our services. The legal basis for this processing is our legitimate interests, namely the proper administration of our business or the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

3.6 We may process information contained in any enquiry you submit to us regarding products and/or services (“enquiry data”). The enquiry data may be processed for the purposes of offering relevant products and/or services to you.

3.7 We may process information relating to transactions, including purchases of products and services that you enter into with us and/or through our website (“transaction data”). The transaction data may include [your contact details, your card details and the transaction details. The transaction data may be processed for the purpose of supplying the purchased products and services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely our interest in the proper administration of our business.

3.8 We may process information contained in or relating to any communication that you send to us including electronic data such as emails (“correspondence data”). The correspondence data may include the communication content and metadata associated with the communication. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.

3.9 We may process data. This data may include training courses or application details. The source of this data is your application details. This data may be processed for application purposes. The legal basis for this processing is our legitimate interests, namely, your course or coaching application or the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

3.10 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

3.11 We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.

3.12 In addition to the specific purposes for which we may process your personal data set out in this Section 3, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

3.13 Please do not supply any other person's personal data to us, unless we prompt you to do so.

4. Providing your personal data to others

4.1 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

4.2 Financial transactions relating to our website and event services are or may be handled by our payment services providers, (our Bank and/or PayPal). We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. You can find information about the PayPal privacy policies, practices and payment methods at [PayPal](#).

4.3 We would only disclose your enquiry data with your informed consent to the others (selected third party) such as potential clients or suppliers of products and services for the purpose of enabling them to contact you so that they can request or offer you relevant products and/or services. Each such third party will act as a data controller in relation to the enquiry data that we supply to it; and upon contacting you, each such third party will supply to you a copy of its own privacy policy, which will govern that third party's use of your personal data.

4.4 In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

4.5 We use a number of different services to communicate with members and event delegates. This may include Mailchimp and Eventbrite See: [Mailchimp Privacy Policy](#) and [Eventbrite Privacy Policy](#).

4.6 For data storage we use Dropbox. See: [Dropbox Privacy Policy](#).

4.7 For the purposes of health and safety, event venues may be provided with a register of delegates names.

4.8 For the purposes of website maintenance, our website consultants may have access to sufficient data to undertake website maintenance. See Easy Space Private Policy <https://www.easyspace.com/>

4.9 For the purposes of undertaking surveys we use *SurveyMonkey*. See: [SurveyMonkey Privacy Policy](#) <https://www.surveymonkey.com/>

5. International transfers of your personal data

5.1 In this Section 5, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA).

5.2 We are based in the United Kingdom. The European Commission has made an "adequacy decision" with respect to the data protection laws of each of these countries. Transfers to each of these countries will be protected by appropriate safeguards, namely the

use of standard data protection clauses adopted or approved by the European Commission, a copy of which can be obtained from their website.

5.3 For the Network members and contractors who are situated in the UK, the European Commission has made an “adequacy decision” with respect to the data protection laws of each of these countries. Transfers to each of these countries will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission.

5.4 You acknowledge that personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

6. Retaining and deleting personal data

6.1 This Section 6 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

6.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

6.3 We will retain your personal data as follows:

(a) Basic personal data (e.g. account data) relating to subscriptions and event applications shall not be kept for longer than is necessary for that purpose or those purposes.

6.4 In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the following criteria:

(a) The period of retention of account data will be determined based on what is considered reasonable.

6.5 Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

7. Amendments

7.1 We may update this policy from time to time by publishing a new version on our website.

7.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

7.3 We may notify you of changes to this policy by email or through a private messaging system].

8. Your rights

8.1 In this Section 8, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

8.2 Your principal rights under data protection law are:

- (a) The right to access;
- (b) The right to rectification;
- (c) The right to erasure;

- (d) The right to restrict processing;
- (e) The right to object to processing;
- (f) The right to data portability;
- (g) The right to complain to a supervisory authority; and
- (h) The right to withdraw consent.

8.3 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data, which may be subject to a reasonable fee.

8.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

8.5 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

8.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

8.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

8.8 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

8.9 To the extent that the legal basis for our processing of your personal data is:

- (a) Consent; or
- (b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

8.10 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

8.11 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

8.12 You may exercise any of your rights in relation to your personal data by written notice to us.

8.13 We will not notify you or confirm that we have passed on your details to the authorities, if necessary, under any relevant UK Terrorism Act or Money Laundering Act.

9. About cookies

9.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

9.2 Cookies may be either “persistent” cookies or “session” cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

9.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

10. Cookies that we may use

10.1 We use cookies for the following purposes:

- (a) authentication – we use cookies to identify you when you visit our website and as you navigate our website
- (b) Status – we use cookies [to help us to determine if you are logged into our website
- (c) Personalisation – we use cookies to store information about your preferences and to personalise the website for you
- (d) Security – we use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally
- (e) Advertising – we use cookies to help us to display advertisements that will be relevant to you
- (f) Analysis – we use cookies to help us to analyse the use and performance of our website and services; and
- (g) Cookie consent – we use cookies to store your preferences in relation to the use of cookies more generally.

11. Cookies used by our service providers

11.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

11.2 We may use our web holding company (*Easyspace*) to analyse the use of our website. To see how *Easyspace* use cookies, visit <https://www.easyspace.com/>

12. Managing cookies

12.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- (c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- (e) <https://support.apple.com/kb/PH21411> (Safari); and
- (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

12.2 Blocking all cookies will have a negative impact upon the usability of many websites. If you block cookies, you may not be able to use all the features on that website.

13 Our details

13.1 Our website is owned and operated by Dr Ho Law, Empsy®.

13.2 Our registered office is at: Empsy© c/o MHA MacIntyre Hudson, 1 The Forum, Minerva Business Park, Lynch Wood, Peterborough PE2 6FT.

14 Contact

14.1 You can contact us:

- (a) By post, to (the postal address given above);
- (b) By email, using the email address published on our website from time to time.

15. Updates and revisions to privacy policy

15.1 This privacy policy will be updated on a regular basis as we and our service providers revise relevant policies and systems.

Endnotes

One of the six basic regulations of the GDPR is “lawful basis” for processing data. In order to satisfy our legal obligation to you as our members, service clients and /event delegates, we would never store and/or process your personal data and/or initiate communications with you and/or others with your personal data without your informed consent unless they were part of the ethical and/or legal requirement.