

Scottish Massage Schools - Data Protection Privacy Policy - May 2018

To perform its function, Scottish Massage Schools (SMS) needs to collect and use certain information about students who apply to study with SMS. As this data is held electronically, SMS is registered with the Information Commissioner's Office (I.C.O.) www.ico.org.uk

SMS regards the lawful and correct treatment of personal information as important to the achievement of our objectives. We therefore strive to ensure that our organisation treats personal information lawfully and correctly.

Data Protection Principles

SMS endorses and is committed to adhering to the eight data protection principles set out in the Data Protection Act. The eight Principles require that personal information is

- Fairly and lawfully processed
- Processed for limited purposes
- Adequate, relevant and not excessive
- Accurate, and kept up-to-date
- Not kept longer than necessary
- Processed in accordance with the data subject's rights
- Held securely
- Not transferred to countries outside the European Economic Area without adequate protection being provided to the personal data on individual subjects

What information does SMS collect?

SMS students apply to join a course by either completing a paper application form or applying online. They are initially asked to consent to SMS holding their personal details, including your name, address, postcode, phone numbers, email address, date of birth, gender, occupation, and qualifications. At weekend 1 of the course, they are then asked about Health and Learning Support requirements, emergency contact and payment details.

Use of Your Personal Data

SMS will use personal information for the purpose of processing effective enrolment, administration and delivery of its courses, and advising of future training opportunities.

- To decide student's eligibility for entry onto SMS courses
- To administer, and ensure smooth delivery of courses
- Students' contact details will be passed to their Course Leader so that there can be 2-way communications between the Course Leader and the students, to respond to questions about the content of the course.
- Where a student has a medical condition / learning disability / English is not their first language, which the Principal feels the Course Leader should be advised of, the student will be asked to share details of their condition with the Course Leader. This is purely to ensure the continued health and safety of the student, and potentially of other course attendees. Depending on the condition, course tutors and assessors may also need to be advised. This will only be done with the student's consent.
- To communicate with students and graduates about SMS's services, up-coming training courses and workshops, massage events in Scotland, work and volunteering opportunities, and other news and notes of interest that we feel students and qualified therapists might be interested in.
- To analyse trends and profiles, and compile statistics
- For auditing purposes
- To prevent or detect fraud
- To enable third parties to carry out any of the above on our behalf, once we have given them permission to do so.

We hold personal information on our systems for as long as is necessary for the purposes set out above and we will remove it when the purposes have been met.

Consent to collect personal information

In compliance with the General Data Protection Act 2018, when a new applicant applies to join one of SMS's courses or workshops, they will be asked to formally consent to allow the SMS to collect and process their personal information.

Scottish Massage Schools - Data Protection Privacy Policy - May 2018

SMS must process student's personal information to perform its function. If an individual is not content to allow the SMS to process personal information, that individual will not be eligible to join an SMS course or workshop.

Security and Storage of Your Personal Data

SMS will take appropriate technical and organisational measures to limit the opportunity for unauthorised or unlawful processing of personal data and to guard against accidental loss, destruction of, or damage to personal data. All access to SMS data is password protected.

Appropriate contractual obligations shall be incorporated into contracts that SMS enters into with third parties. SMS shall ensure that all staff undertaking data processing are aware of their responsibilities in relation to the processing of personal data as it applies to their area of work.

Sharing of Personal Data

We may share information in the following circumstances:

- Where we are required to do so by Law, with authorised legal authorities and SMS's lawyers
- Where we are required to do so with authorised Regulatory Authorities, such as the Scottish Massage therapists Organisation (S.M.T.O.), the General Council for Massage Therapies (G.C.M.T.) or the Complementary & Natural Healthcare Council (C.N.H.C.)
- Where we are required to do so with our insurance company, to confirm that you are in fact an SMS student or wishing to be.
- If you pay your course / workshop fees by card, we are required to share your name, city/town you live in, phone number, email address and card details with WorldPay.
- When you have given consent for us to do so

Your individual rights under the Data Protection Act 2018 (G.D.P.R.)

You have:

- the right of access to your personal data
- the right to object to and restrict the processing of your personal data
- the right to rectification of your personal data
- the right to erasure of your personal data
- the right to data portability (to receive a copy of your personal data)

SMS's Rights

In exercising your Individual Rights, you should understand that in some situations SMS may be unable to fully meet your request. For example, if you make a request for me to delete all your personal data, I may be required to retain some data for taxation, legal, regulatory and insurance purposes.

You should understand that when exercising your rights, a substantial public or vital interest may take precedence over any request you make. In addition, where these interests apply, we are required by law to grant access to this data for law enforcement, legal and/or health related matters.

Complaints

If you are dissatisfied with the way in which we process your personal data, you have the right to complain to the UK's Data Protection Supervisory Authority, the Information Commissioner's Office (ICO).

The ICO may be contacted via its website which is www.ico.org.uk/concerns by live chat or by calling their helpline on 0303-123-1113.

How to contact SMS

If you have any questions regarding the use of your data, please contact SMS on:

- 08454-757871 or 07917-757871
- info@scottishmassage.co.uk
- Write to us at 27 Craigs Avenue, Edinburgh, EH12 8HS.