

Privacy Notice for Website Users

1. The Humberside Group of Local Medical Committees Ltd (Humberside LMCs) is committed to protecting the privacy of its users. This Privacy Notice is designed to help you understand what information we gather, how we use it, what we do to protect it, and to assist you in making informed decisions when using our website.

What information do we collect?

2. We collect a range of information about you including usage data, general demographic information, referring/exit pages and URLs, platform types, preferences you submit and preferences that are generated based on the data you submit and number of clicks.
3. We may also track information provided to us by your browser or by our mobile application when you use our website. This could include information such as the website you came from (known as the “referring URL”), the type of browser you use, the device from which you connected to the website and the time and date of access.
4. You may provide us with information such as your name, address and email address by using our contact form or completing a feedback form.
5. We do not collect any **Special Categories of Personal Data** about you through your website. (Special categories of data include details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.
6. If you are using our website, it is possible that we have a pre-existing relationship with you as one of our represented GPs, as a business contact or in some other capacity. We have a number of related Privacy Notices relating to our use of personal data in different situations and if you would like to obtain a copy of any of these, you can do so by contacting us.

How do we store your data?

7. Our website is hosted by Weebly, Inc. (“Weebly”). Your information, including personal information, may be stored on Weebly’s servers. By using the website, you consent to Weebly’s collection, disclosure, storage, and use of your personal information in accordance with Weebly’s privacy policy available at <https://www.weebly.com/privacy> .
8. Your data may be sent and processed outside of the UK by Weebly who are a company based in the U.S.

9. Weebly participated in and has certified its compliance with the EU-US Privacy Shield Framework. This has been agreed between the U.S and EU authorities as providing a suitable level of protection for data which is passing outside of the EU.
10. Where Weebly provides access to any third party acting on its behalf (for example for the purposes of technical support), it complies with the Privacy Shield Principles for all onward transfers of personal data from the EU, including the onward transfer liability provisions.

Why do we process personal data?

This section explains the purposes for which we may use personal data about you that we have collected through your use of our website.

11. **Providing information and services** –We use your personal data to email you our newsletter, highlight specific issues you may need to know about that relate to GPs or general practice, and to tell you about relevant events and training we are organising for you. If you sign up to one of our events we will also use your contact details to provide information about it e.g. timings and venues and follow-up information such as sharing presentations given and providing CPD certificates.

We will not send you our newsletter or information about events and training being offered if you have told us that you do not want to hear from us in that way. Please note that if you ask us not to contact you for these purposes, you will still hear from us for other reasons – for example, as part of our ordinary relationship management activity or as part of our statutory and representative functions.

12. **Monitoring and improving our websites** - We use information such as how different people navigate around our website, how long they spend on particular pages and whether they download any of our content in order to help customise and improve the user experience of our websites. It also allows us to tailor the website to match your interests and preferences better and helps us understand who has visited which pages to determine the most popular areas of the website.
13. **Legal and regulatory purposes** - We may use your personal data for legal and regulatory purposes. For example, this might include responding to complaints or enquiries from you or a regulator about how we have used your personal data.

What are our legal grounds for handling personal data?

14. By accessing our website, you accept our privacy notice and you **consent** to the use of cookies.
15. The UK's data protection law allows the use of your personal data where necessary for legitimate purposes provided that this isn't outweighed by the impact it has on you. The law calls this the "legitimate interests" condition for processing personal data. When you provide us with your personal information through our website e.g. your contact information, the **legitimate interests** we are pursuing are:
 - Maintaining and using our business relationships
 - Marketing – promoting our organisation and services

- Informing people about products and services that may be of use to them
 - Monitoring and securing our systems and data
16. If you sign up to one of our products or services, it may be necessary for us to use your details in the **performance of a contract or to take steps to enter into a contract with you.**
 17. We may on occasion be under a **legal obligation** to comply with a request for information from Regulators, government bodies or courts.

How do we use and share information?

18. We do not sell, trade or rent your personal information with other organisations.
19. Any information you provide through contact forms, event booking forms or survey responses on our website will be shared internally within The Humberside Group of Local Medical Committees Ltd and be accessed by any of our employees if the data is necessary for the performance of their roles.
20. We track information about our website visitors through the use of 'cookies'. These are small text files which include an anonymous unique identifier. Cookies are sent to your browser from our servers and are stored on your computer hard drive. Sending a cookie to your browser enables us to collect information about you and keep a record of your preferences when using our services, both on an individual and aggregate basis. We may use both persistent and session cookies. Persistent cookies remain on your computer after you close your session and until you delete them, while session cookies expire when you close your browser. Persistent cookies can be removed by following your internet browser help file directions. If you choose to disable cookies, some areas of the website may not work properly.
21. When you visit www.humbersidelmc.org.uk, we use a third-party service, Google Analytics to collect standard internet log information and details of visitor behaviour patterns. We do this to find out such things as the number of visitors to the various parts of the site. This information is only processed in a way that does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.
22. We may share your personal information with other third-party providers who provide services to us. In general, these third-party providers will only collect, use and disclose your information to the extent necessary to allow them to perform the services they provide for us. For example, if you provide us with personal information to complete an event booking for which there is a charge, you consent to our collecting and using such personal information for that specific purpose, including by transmitting such information to our card processing provider (and their service providers).
23. Most of our third-party service providers have their own privacy policies in respect of the information that we are required to provide to them in order to use their services. For these third-party service providers, we recommend that you read their privacy policies so that you can understand the manner in which your personal information will be handled by such providers.
24. We may disclose your personal information if required to do so by law.

25. 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.
26. In the event that Weebly undergoes a business transaction such as a merger, acquisition by another company, or sale of all or a portion of its assets, your personal information may be among the assets transferred. You acknowledge and consent that such transfers may occur and are permitted by this Privacy Notice, and that any acquirer of Weebly's assets may continue to process your personal information as set out in this document.

How do we protect data?

27. We implement reasonable precautions, follow industry best practices and have a Data Protection Policy in place in order to protect your personal information and ensure that such personal information is not accessed, disclosed, altered or destroyed.
28. These measures do not guarantee that your information will not be accessed, disclosed, altered or destroyed by breach of such precautions. By using our website, you acknowledge that you understand and agree to assume these risks.

How long do we keep data?

29. We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
30. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
31. Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.

Your rights

32. You have a number of different rights in relation to the personal data that we hold about you. These are:
 - **Access:** You have a right to find out what personal data we hold about you, and certain other information such as how we are using it.
 - **Withdrawal of consent:** When we rely on your consent to use your data, you have the right to withdraw that consent at any time. You can do this by contacting us, or (in the case of emails that are sent on the basis of consent) by clicking the "unsubscribe" link.
 - **Objection to direct marketing:** You have the right to object to us using your personal data for direct marketing purposes. If you do this we will stop using it for those purposes.

- **Rectification:** If the information that we hold about you is inaccurate or out of date, you have a right to ask us to correct it.
- **Objection to legitimate interests:** If you disagree with us relying on the legitimate interests grounds for using your personal data, you can object to us doing so. We will then reassess the extent to which we can continue to use the data in light of your particular circumstances. In the case of emails that are sent on the basis of legitimate interests, you can do this by clicking on the "unsubscribe" link.
- **Erasure:** In certain circumstances you can ask us to delete your personal data from our systems. However, this usually won't apply to all of your data because we might have good reason for needing to keep some of it.
- **Restriction:** In some circumstances you can ask us to restrict the ways in which we use your personal data.
- **Portability:** You have the right to receive some limited kinds of information in a portable format.

33. If you would like to exercise any of these rights, have any concerns as to how your data is processed or would like further information about anything contained within this document, please contact Amalia Booker, Director of Operations by any of the following means:

Email: amalia.booker@nhs.net
 Phone: 01482 655111
 Post: The Humberside Group of Local Medical Committees Ltd, Albion House,
 Albion Lane, Willerby, Hull, HU10 6TS

34. If you believe that the organisation has not complied with your data protection rights, you can complain to the Information Commissioner's Office (ICO). Further information about reporting a concern can be found at: <https://ico.org.uk/concerns/>. The ICO can also be contacted:

By phone: 0303 123 1113
 In writing: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow,
 SK9 5AF

What if you do not provide personal data?

35. Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.