



Privacy Policy – Website & Training Services May 2018

Griffin Occupational Therapy (GriffinOT Ltd)

This statement outlines information on how we store and use your data and personal information. It relates to online services (website and training services) provided by GriffinOT.

1.0 Who are we?

GriffinOT Ltd (formally Kim Griffin Ltd) is a limited company registered with Companies House (no. 7140862). GriffinOT Ltd also operates a website (GriffinOT.com) which provides online training and information.

We also provide independent paediatric occupational therapy services to families, adoption support services and schools. The company is owned and directed by Kimberley Griffin, an Occupational Therapist registered with the Health Professional Council. Please note this privacy policy relates to website and training services and there is a separate privacy document for clinical services.

Griffin OT Ltd is committed to protecting the privacy of information provided by clients. Our policies and procedures are in line with the Information Commissioners Office (ICO) General Data Protection Regulations effective from May 2018.

Please read this Privacy Policy carefully and ensure that you understand it. You will be required to read and accept this Privacy Policy when signing up for our mailing lists or training courses. If you do not accept and agree with this Privacy Policy, you must stop using GriffinOT.com immediately

2.0 Scope – What Does This Policy Cover

This Privacy Policy applies only to your use of GriffinOT.com. It does not extend to any websites that are linked to from GriffinOT.com (whether We provide those links or whether they are shared by other users). We have no control over how your data is collected, stored or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them. We do use a number of other service providers which are outlined in this policy, and you will be required to agree to their Privacy Policies when signing up for an account or onto our mailing list.

3.0 What data do we collect?

Some data will be collected automatically by GriffinOT.com, other data will only be collected if you voluntarily submit it, for example, when signing up for our newsletter or training. Depending upon your use of GriffinOT.com, We may collect some or all of the following data:

- 3.1 IP address (automatically collected);
- 3.2 Web browser type and version (automatically collected);
- 3.3 Operating system (automatically collected);
- 3.4 A list of URLs starting with a referring site;
- 3.5 Your activity on GriffinOT.com including length of time on the site, and number of pages visited (automatically collected);
- 3.6 The site you exit to (automatically collected).

You can control some of the data that is submitted automatically by changing the settings in your web browser. We use Google Analytics and Bing Webmaster on our site to collect this information. Some information is also collected by our website host Siteground and website platform Wordpress.

If you sign up for our mailing list in addition we will also collect:

- 3.7 Your First Name;
- 3.8 Your Email Address;
- 3.9 Your Occupation (optional);
- 3.10 Your consent and correspondence preferences.

Please note this information is collected and stored by mailchimp.com and you will be required to agree to their Privacy Policy in addition to ours when signing up.

If you sign up for our courses we will also collect:

- 3.11 Your address;
- 3.12 Payment details – billing address / card details;
- 3.13 Your company details if applicable;
- 3.14 Information regarding your log in and completion of our courses.

Please note this information is collected and stored by teachable.com and you will be required to agree to their Privacy Policy in addition to ours when signing up.

If you email us we will collect your name and email address.

If you complete a feedback questionnaire within our courses we will also collect your opinions and answers to the questions. Feedback questionnaires are always optional and anonymised. From time to time there may be a testimonial box, this box will include a request for consent to publish any comments written within it and whether you would prefer this to be published anonymously or with your first name and location.

4.0 Our lawful basis for collecting this information.

Our lawful basis for collecting this information under article 6 of GDPR is because we have a 'legitimate interest' (under article 6 of GDPR). We cannot adequately deliver our information and training services to you without processing some of your personal information.

5.0 How we use your personal information / the data we collect?

We use your data to provide the best possible products and services to you. This includes:

- 5.1 Providing and managing your access to GriffinOT.com;
- 5.2 Personalising and tailoring your experience on GriffinOT.com;
- 5.3 Supplying products and services from GriffinOT Ltd to you;
- 5.4 Personalising and tailoring GriffinOT Ltd products and services for you;
- 5.5 Responding to communications from you;
- 5.6 Analysing your use of GriffinOT.com and gathering feedback to enable Us to continually improve GriffinOT.com and your user experience;
- 5.7 Marketing emails that you have consented to receive when joining our mailing list. This may include:
 - Monthly Newsletter – Sent once a month, you will receive a maximum of 12 newsletters a year. The newsletters will include information on new posts we have made to our website, information on training courses and products and updates on events at GriffinOT.
 - Updates on Online Courses – Sent out when we release new or update existing online courses. We anticipate this will occur 4-6 times a year.
 - Updates on new Products – Sent out when we release new or updated products aside from our online training such as books or face to face training or resources. We anticipate this will occur 4-6 times a year.
 - Marketing emails with offers on products and training – Sent out when these are available. We anticipate this will occur 6-12 times a year.
- 5.8 If you have completed a feedback questionnaire, the data is aggregated when analysed. We use this information to inform business planning, including updates, changes and additions to our courses. Where consent is given, information within testimonial boxes may be used on our website, and promotional materials for the course.
- 5.9 If you have signed up to one of our courses we will use your information to
 - Send you your completion certificate.
 - Notify you if there are any problems with the course.
 - Notify you if there are any updates specific to your course as occasionally we make changes or additions to the content.
 - We also use anonymised aggregate data of course sign up numbers and completion rates to assist with our planning.
- 5.10 We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the Data Protection Act 1998 and the Privacy and Electronic Communications (EC Directive) Regulations 2003, as amended in 2004, 2011 and 2015 and the General Data Protection Regulations 2018.

6.0 How do we store your data.

- 6.1 We only keep your data for as long as We need to in order to use it as described above in section 4, and/or for as long as We have your permission to keep it.
- 6.2 Some or all of your data may be stored or transferred outside of the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland and Liechtenstein). You are deemed to accept and agree to this by using GriffinOT.com and submitting information to GriffinOT Ltd. If We do store or transfer data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the EEA and under the Data Protection Act 1998 and the GDPR 2018. Such

steps may include, but not be limited to, the use of legally binding contractual terms between GriffinOT Ltd and any third parties We engage and the use of the EU-approved Model Contractual Arrangements.

- 6.3 Data security is of great importance to GriffinOT Ltd, and to protect your data We have put in place suitable physical, electronic and managerial procedures to safeguard and secure data collected through GriffinOT.com and have ensured all of the platforms we use for data storage and management are GDPR compliant.
- 6.4 GriffinOT uses Google Suite for email and document storage. The privacy policy for Google Suite can be [found here](#). If you email us or receive documentation (e.g. completion certificates, quotes) this information will be stored within Google Suite. Emails sent from GriffinOT are not encrypted. We also run Google Analytics on our website.
- 6.5 If you sign up for a training account you will be providing your details to the Teachable platform. The privacy policy for Teachable can be [found here](#). The information within your training account is not directly held by GriffinOT Ltd and is subject to Teachable policies. GriffinOT Ltd staff have access to some of this information. All online course payments are also directed through the Teachable platform.
- 6.6 If you sign up for any of GriffinOT Ltd's mailing lists you will be providing your details to the Mail Chimp platform. The privacy policy for Mail Chimp can be [found here](#). The personal information provided for our mailing list is not directly held by GriffinOT Ltd and is subject to Mail Chimp policies. GriffinOT Ltd staff have full access to this information.
- 6.7 All feedback surveys are run through Survey Monkey. The privacy policy for Survey Monkey can be [found here](#). Feedback surveys will register your IP address, web browser and version and operating system as these are automatically collected. Unless you are completing free training in return for feedback inclusion of other personal details on these surveys is either not required or optional and all answers are anonymised.
- 6.8 Our website is hosted by Siteground and run off Wordpress.org with the GDPR plugin to make both GDPR compliant.

7.0 Sharing of Personal Data

Aside from the platforms used to conduct our business, as outlined in point 6, We do not share your details with any third parties.

8.0 How long is the information kept?

8.1 Training records if you have completed a course

We will hold a copy of your training record for 24 months after your access to the course has expired. After this time we will delete this information from the system, including completion certificates.

8.2 Enquiry Emails

We will hold a copy of general enquiry / information emails for 12 months. After this time we will delete this information from the system. If your child is seen by therapists at GriffinOT following an enquiry email or specific clinical advice is given then the emails will then fall under the Privacy Policy for Clinical Services which can be found here: <https://www.griffinot.com/policies/> .

8.3 Mailing List Emails

We will typically hold your email on our list until you unsubscribe from our mailing. You will have the option to unsubscribe at the bottom of every email you receive from us.

From time to time we may do an audit of our mailing list and remove users who have not opened any emails in the last 12 months. In this case your data will be removed if you not actively engaged in any of our campaigns in the previous 12 month period.

12. Cookies

Please see our Cookies Policy for further information on use of cookies. It is available on our policies page: <https://www.griffinot.com/policies/>.

9.0 Our responsibilities

We are committed to maintaining the security and confidentiality of your child's record. We actively implement security measures to ensure their information is safe, and audit these regularly. We will not release your personal details to any third party without first seeking your consent, unless this is allowed for or required by law. We are constantly working to ensure compliance with current data protection regulation.

10.0 Your rights

Data protection legislation gives you, the parent, and various rights. The most important of these are as follows:

- 10.1 You have the right to a copy of information we hold about you
- 10.2 You have the right to ask for your record to be amended if you believe that it is wrong.
- 10.3 You have right to be forgotten (right to eraser)
- 10.4 You have the right to request Data Portability - please note we will only able to provide data that we are still holding so we will only be able to provide certain data within a 12 or 24 month time frame, as outlined above in section 8.0.
- 10.5 You have the right to withdraw the consent for GriffinOT to send you email correspondence at any time. You can unsubscribe from our mailing list using the unsubscribe link at the bottom of our emails.

If you wish to enact either of these rights please contact us at support@griffinot.com.

11.0 What if I have concerns about how my information is stored or managed?

You have the right to report any concerns to the Information Commissioners Office (ICO). For further information please see their website <https://ico.org.uk/concerns/>.

Our IOC registration number is: ZA199250

12.0 Contacting GriffinOT Ltd

If you have any questions about GriffinOT.com or this Privacy Policy, please contact GriffinOT Ltd by email at support@griffinot.com. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you.

13.0 Changes to Our Privacy Policy

We may change this Privacy Policy as we may deem necessary from time to time, or as may be required by law. Any changes will be immediately posted on GriffinOT.com and you will be deemed to have accepted the terms of the Privacy Policy on your first use of GriffinOT.com following the alterations. We recommend that you check this page regularly to keep up-to-date.

25 May 2018
GriffinOT.com