**ANATOMICAL SOCIETY – PRIVACY NOTICE** 

The Anatomical Society respects your privacy and is committed to protecting your personal data. This privacy notice explains how we look after your personal data and provides information about your privacy rights and how the law protects you.

It is important that you read this privacy notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your personal data. This privacy notice supplements any other notices and is not intended to override them.

We have included a Glossary of terms used in this privacy notice in section 10.

This privacy notice is available on the Anatomical Society website where you can also down load a PDF version of this notice.

**1. IMPORTANT INFORMATION AND WHO WE ARE**

**2. THE DATA WE COLLECT ABOUT YOU**

**3. HOW IS YOUR PERSONAL DATA COLLECTED**

**4. HOW WE USE YOUR PERSONAL DATA**

**5. DISCLOSURES OF YOUR PERSONAL DATA**

**6. INTERNATIONAL TRANSFERS**

**7. DATA SECURITY**

**8. DATA RETENTION**

**9. YOUR LEGAL RIGHTS**

**10. GLOSSARY**

1. Important information and who we are

When we refer to “we” or “us” in this privacy notice we are referring to the Anatomical Society. We are a charity registered in England & Wales with charity number 290469.

The Anatomical Society is the **controller** of personal data we collect about you, which means we are responsible for deciding how we hold and use your personal data.

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the contact details set out below.

Contact details

**Email**: maryanne.piggott@kcl.ac.uk

**Post**: c/o Department of Anatomy and Human Sciences, King’s College (London), Guy’s Hospital Campus, Room HB4.2N Hodgkin Building, London, SE1 1UL, UK.

**Telephone**: + 44 207 848 8234

Changes to the privacy notice or changes to your information

We keep this privacy policy under regular review and we may update it at any time. You can find our current privacy notice on the Anatomical Society website https://www.anatsoc.org.uk/policies/privacy-statement.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

The Anatomical Society 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.

2. The data we collect about you

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

* **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
* **Contact Data** includes billing address, delivery address, email address and telephone numbers.
* **Academic data** which may include application details the society provides, academic institutions etc.
* **Financial Data** may include bank account and payment card details.
* **Transaction Data** may include details about payments from you and other details of products and services you have purchased from us (e.g. membership or events).
* **Technical Data** may include internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the Anatomical Society website.
* **Usage Data** includes information about how you use our website, products and services.
* **Marketing and Communications Data** which mayinclude your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

If you fail to provide personal data

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 membership 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.

**3. How is your personal data collected?**

**Direct from you:**

You may give us your Identity, Contact and Financial Data when you fill in forms or correspond with us by post, phone, email or otherwise. This includes personal data you provide when you:

* apply for our products or services (e.g. membership);
* create an account on our website;
* register for our meetings or publications;
* request marketing or other information to be sent to you;
* enter a competition, promotion or survey; or give us some feedback.

**Automated collection**:

 If you interact with our website we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies (you can find more information about how we use cookies in section 4 below).

**From third parties or publicly available sources:**

We may receive personal data about you from the third parties and public sources as set out below:

* Technical Data from the following parties analytics providers such as Google;
* Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as The Royal Society of Biology (RSB) who we use to run our membership process.

**4. How we use your personal data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

* Where we need to **perform a contract** that we are about to enter into, or have entered into, with you.
* Where it is necessary for our **legitimate interests** (or those of a third party) and your interests and fundamental rights do not override those interests.
* Where we need to **comply with a legal or regulatory obligation**.
* Where we have your **consent**.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

|  |  |  |
| --- | --- | --- |
| **Purpose/Activity** | **Type of data** | **Lawful basis for processing including basis of legitimate interest** |
| To register you as a new member of the society. | (a) Identity (b) Contact | Performance of a contract with you |
| To register and attend Anatomical Society Meetings and Conferences  | (a) Identity(b) Contact(c) Financial (d) Transaction (e) Marketing and Communications | Performance of a contract with you |
| To process and award studentships, grants, prizes and fellowships  | (a) Identity(b) Contact(c) Financial (d) Transaction (e) Marketing and Communications | (a) Performance of a contract with you(b) Necessary for our legitimate interests (to keep our records updated)(c) Financial interest |
| To advertise, process, award and track relevant research awards and grants such as PhD studentships  | (a) Identity(b) Contact(c) Financial (d) Transaction (e) Marketing and Communications | (a) Performance of a contract with you(b) Necessary for our legitimate interests (to keep our records updated)(c) Financial interest |
| To process applications and training acquired through the Anatomical Training Programme and partners such as the American Association of Anatomy | (a) Identity(b) Contact(c) Financial (d) Transaction (e) Marketing and Communications | (a) Performance of a contract with you(b) Necessary for our legitimate interests (to keep our records updated)(c) Financial interest |
| To advertise and run public engagement and outreach events through the society and its partners  | (a) Identity(b) Contact(c) Marketing and Communications | (a) Performance of a contract with you(b) Necessary for our legitimate interests (to keep our records updated) |
| To process and deliver services that we provide to you including:(a) Managing payments, fees and charges including membership applications and conferences registrations.(b) Collect money owed to us(c) Fulfilling your subscription to the Journal of Anatomy | (a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications | (a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts (e.g. membership fees) due to us) |
| To manage our relationship with you which will include:(a) Notifying you about changes to our terms or privacy notice(b) communicating with you about your membership, an event you have registered to attend or a funding application you have made(c) Asking you to leave a review or take a survey | (a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications | (a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts (e.g. membership fees) due to us) |
| To enable you to partake in a competition or complete a survey | (a) Identity (b) Contact (c) Profile (d) Marketing and Communications | (a) Performance of a contract with you (b) Necessary to comply with a legal obligation(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services) |
| To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)  | (a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications | (a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business) |
| To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to youOur website is not intended for children and we do not knowingly collect data relating to children. | (a) Identity(b) Contact(c) Technical | (a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)(b) Necessary to comply with a legal obligation |
| To use data analytics to improve our website, products/services, marketing, customer relationships and experiences | (a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical  | Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy) |
| To make suggestions and recommendations to you about goods or services that may be of interest to you (see ‘Promotional offers from us’ below) | (a) Technical (b) Usage  | Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy) |
|  | (a) Identity (b) Contact (c) Technical (d) Usage (e) Profile  | Necessary for our legitimate interests (to develop our products/services and grow our business) |

 Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data 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 products, services and offers may be relevant for you (we call this marketing). For example we may from time-to-time send you details of our upcoming conferences.

You may receive such marketing communications from us if you have requested information from us or purchased membership from us and you have not opted out of receiving that marketing.

We will obtain your opt-in consent to send you electronic marketing communications if you have not previous purchased commercial goods or services from us.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside the Anatomical Society for marketing purposes. See section 5 below (‘Disclosures of your personal data’) for information about the third parties that we work with.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions.

Cookies

The Anatomical Society Web site use cookies to help you personalize your online experience. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer. Cookies are uniquely assigned to you and can only be read by a web server in the domain that issued the cookie to you.

One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the Web server that you have returned to a specific page. For example, if you personalize The Anatomical Society pages, or register with The Anatomical Society site or services, a cookie helps The Anatomical Society to recall your specific information on subsequent visits. This simplifies the process of recording your personal information, such as billing addresses, shipping addresses, and so on. When you return to the same The Anatomical Society Web site, the information you previously provided can be retrieved, so you can easily use the The Anatomical Society features that you customized.

You have the ability to accept or decline cookies. We will ask for your consent to use cookies when you first visit our website. You can also modify your browser settings to decline cookies. If you choose to decline cookies, you may not be able to fully experience the interactive features of the Anatomical Society services or Web sites you visit.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will usually notify you and explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent if required or permitted by law.

5. Disclosures of your personal data

In order to fulfil the purposes set out in the table in section 4 above, we may your personal data with the External Third Parties listed in section 10.

We may also share your personal data if we choose to transfer or merge parts of our organisation or our assets with another third party. the new owners may use your personal data in the same way as set out in this privacy notice. If a change happens to our organisation, then the new trustees or directors may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law.

**6. International transfers**

We may share your personal data with third parties based outside the UK. If we transfer your personal data to anothercountry, we will be responsible for ensuring your privacy rights continue to be protected as outlined in this privacy notice. Please contact us if you want further information on the specific safeguards used by us when transferring your personal data out of the UK.

**7. Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

**8. Data retention**

We will only keep 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.

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. For financial data we will keep records for 6 years. Certificates of Employers Liability Insurance will be kept for 40 years. Governance records, a fixed asset register and annual trustees’ reports and accounts will be kept permanently. We will keep all other information for 20 years.

We will keep a record of Anatomical Society staff, trustees and member names and affiliations only in the historical record of the society on the ground of legitimate interest unless you request that these be erased as detailed in Section 10.

**9. Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Full details of the legal rights that you can exercise are set out in the Glossary. If you wish to exercise any of the rights set out above, please contact us (see ‘Contact Details’ above).

You also have rights in relation to **automated decision making** which has a legal effect or otherwise significantly affects you. You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces significant legal effects concerning you.

**No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

**What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

**Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

**Complaints**

You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK supervisory authority for data protection issues (www.ico.org.uk). We would appreciate the chance to deal with your concerns before you approach the ICO and we ask you to contact us in the first instance.

10. Glossary

PERSONAL DATA means any information from which you can be identified, such as your name, your home address, your personal email contact details, or your telephone number. Personal data does not include information where your identity has been removed (anonymous data).

SPECIAL CATEGORY DATA means personal data which apply to the following categories. These types of personal data require a higher level of protection.

• personal data revealing racial or ethnic origin;

• personal data revealing political opinions;

• personal data revealing religious or philosophical beliefs;

• personal data revealing trade union membership;

• genetic data;

• biometric data (where used for identification purposes);

• data concerning health;

• data concerning a person’s sex life; and

• data concerning a person’s sexual orientation

LAWFUL BASIS means the legal condition in the data protection legislation that we rely on in order to use your personal data lawfully and fairly, most commonly:

* **Legitimate Interest** means the interest of the Anatomical Society and/or a third party (such as the American Association for Anatomy) in conducting and managing our business and operations. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not rely on legitimate interests to use your personal data if our interests are overridden by the impact on you.
* **Performance of Contract** means using your personal data where necessary in order to perform of a contract that we have with you, or to take steps at your request to enter into such a contract.
* **Comply with a legal or regulatory obligation** means using your personal data where necessary in order to comply with a legal or regulatory obligation that we are subject to.

EXTERNAL THIRD PARTIES means the following third parties who we may share personal data with:

* Service providers based in the UK who provide IT and system administration services to us.
* Our professional advisers based in the UK, including Coutts, Haysmacintyre, and other third parties who provide consultancy, banking, legal, insurance and accounting services to us.
* HM Revenue & Customs, Companies House, the Charity Commission, the Information Commissioner’s Office (ICO) or other regulators and authorities who require us to make submissions to them.
* the police, a court or other law enforcement agency, for example for the purposes of prevention of fraud or other crime
* Lemon and Co, Kings College
* Wiley Publishers
* FST Learned Societies Officer
* RSB
* Webree
* Azure
* Sitefinity
* Anatomy Training Programme (ATP) and American Association of Anatomists
* IFAA Congress and IFAA
* Self-employed contractors e.g Managing Editor of Journal of Anatomy; Managing Editor of Aging Cell, Meetings Administrator, ATP Administrator etc.

YOUR LEGAL RIGHTS

You have the right to:

* **Request access** to your personal data (commonly known as a subject access request). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
* **Request correction** of the personal data that we hold about you which is incorrect, incomplete or inaccurate. We may need to verify the accuracy of the new data you provide to us.

In certain circumstances, you also have the right to:

* **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where: there is no good reason for us continuing to have it; or where you have successfully exercised your right to object to processing (see below); or where we may have processed your personal data unlawfully; or where we are required to erase your personal data to comply with local law. If we are unable to comply with your request for erasure we will notify you of the reasons why.
* **Object** to us using your personal data for legitimate interest or direct marketing purposes. We may refuse your request if we believe there are compelling legitimate grounds for us to continue to use your personal data.
* **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data: if you want us to establish the data's accuracy; or where our use of the data is unlawful but you do not want us to erase it; or where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or if you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
* **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Please note that this right only applies to automated information which you initially provided consent for us to use or where we used the personal data to perform a contract with you.
* **Withdraw consent** at any time if we are relying on consent to process your personal data. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

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