

NAHS Privacy Policy

Introduction

The National Association for Healthcare Security (NAHS) is a voluntary membership-based organisation for Healthcare Security professionals and those involved in the delivery of Healthcare Security and Security Services to the sector.

As a professional organisation, we fully appreciate the trust you place in us when sharing your personal data. The security of that data is very important to us. In this document, we explain how we collect, use and protect your personal data. We will also explain what rights you have with regards to your personal data and how you can exercise those rights. If you have questions about how we process personal data, or would like to exercise your data subject rights, please email us at info@nahs.org.uk

To ensure we process and handle all personal data correctly, NAHS is registered with the Information Commissioner's Office (ICO) and we have appointed John Currie as our Data Protection Officer who will lead in the area. Our registration certificate is available on the website and our unique registration number is ZA545763 and was issued on 31st August 2019

Collection of personal data

Under the Data Protection Act 2018 (GDPR), NAHS has to inform you as to why they need to collect your personal data.

We collect personal information from you for any one or more of the following reasons:

1. To process Association membership.
2. To provide you with information that you have requested or which we think may be relevant to a subject in which you have demonstrated an interest;
3. To manage any communication between you and us.
4. To fulfil a contract that we have entered into with you or with the organisation that you represent
5. To ensure the security and safe operation of our website and Association database and infrastructure.

Storage of personal data

NAHS is a UK organisation however, we do not occupy or have a registered office address as our Executive Board and management team are all volunteers who work for the NHS full time. We have appointed a Webmaster and our Executive Director responsible for Press, Social Media and Information Technology oversees and manage all our systems and processes. NAHS can confirm that all of your data is processed and stored on dedicated and protected servers in the UK and is not Cloud based.

Our payment processors and banking arrangements are based in the UK. We operate a data retention policy in respect of all data, whether paper-based or digital and those aspects of it which relate to personal data are reviewed on a regular basis and retained only for the period of use as defined above under the section entitled Collection of Personal Data.

Security measures

We have what we believe are appropriate security controls in place to protect personal data including risk assessment to the rights and freedoms of data subjects.

All of your data is processed and stored on dedicated and firewall protected servers in the UK and is not Cloud based.

All personal data is processed in a central system with processes to ensure that only those members of staff who are authorised have access to your information.

Your rights

Under the Data Protection Act 2018 data subjects whose personal information we hold, you have certain rights.

If you wish to exercise any of these rights, please email info@nahs.org.uk or use the information supplied in the 'Contact us' section of the website. In order to process your request, we will ask you to provide two valid forms of identification for verification purposes.

Your rights are as follows:

- **The right to be informed.**

As a data controller, we are obliged to provide clear and transparent information about our data processing activities. This is provided by this privacy policy and any related communications we may send you.

- **The right of access.**

You may request a copy of the personal data we hold about you free of charge. Once we have verified your identity and, if relevant, the authority of any third-party requestor, we will provide access to the personal data we hold about you as well as the following information:

- a) The purposes of the processing
- b) The categories of personal data concerned
- c) The recipients to whom the personal data has been disclosed
- d) The retention period or envisioned retention period for that personal data

When personal data has been collected from a third party, the source of the personal data

- If there are exceptional circumstances that mean we can refuse to provide the information, we will explain them. If requests are frivolous or vexatious, we reserve the right to refuse them. If answering requests is likely to require additional time or occasions unreasonable expense (which you may have to meet), we will inform you.

- **The right to rectification**

When you believe that we hold inaccurate or incomplete personal information about you, you may exercise your right to correct or complete this data. This may be used with the right to restrict processing to make sure that incorrect/incomplete information is not processed until it is corrected.

- **The right to removal** (the 'right to be forgotten')

Where no overriding legal basis or legitimate reason continues to exist for processing personal data, you may request that we delete the personal data. This includes personal data that may have been unlawfully processed. We will take all reasonable steps to ensure erasure.

- **The right to restrict processing**

You may ask us to stop processing your personal data. We will still hold the data, but will not process it any further. This right is an alternative to the right to erasure. If one of the following conditions applies you may exercise the right to restrict processing:

- a) The accuracy of the personal data is contested
- b) Processing of the personal data is unlawful
- c) We no longer need the personal data for processing but the personal data is required for part of a legal process
- d) The right to object has been exercised and processing is restricted pending a decision on the status of the processing

- **The right to data portability**

You may request your set of personal data be transferred to another controller or processor, provided in a commonly used and machine-readable format. This right is only available if the original processing was on the basis of consent, the processing is by automated means and if the processing is based on the fulfilment of a contractual obligation.

- **The right to object**

You have the right to object to our processing of your data where:

Processing is based on legitimate interest;
Processing is for the purpose of direct marketing;
Processing is for the purposes of scientific or historic research;
Processing involves automated decision-making and profiling.

Contact us

Any comments or questions about this privacy policy or our handling of your personal data should be emailed to info@nahs.org.uk marked for the attention of the Data Protection Officer.

Complaints

Should you wish to discuss a complaint, please feel free to contact info@nahs.org.uk.

Please note that all complaints are handled confidentially, however, should you feel at all dissatisfied with how we handle or manage your data, you are entitled to escalate your complaint to the Information Commissioner's Office. The ICO is contactable at <https://ico.org.uk/global/contact-us/>