



International Federation of Aromatherapists

PRIVACY POLICY NOTICE

Introduction

The International Federation of Aromatherapists ('IFA') is committed to protecting and respecting your privacy. This policy (together with the terms of use and any other documents referred to in it) sets out the basis on which any personal data the IFA collects from you, or that you provide to it, will be processed. Please read the following carefully to understand the IFA's practices regarding your personal data and how it will be treated.

The rules on processing of personal data are set out in the General Data Protection Regulation (the "GDPR").

1. Definitions

Data controller - A controller determines the purposes and means of processing personal data.

Data processor - A processor is responsible for processing personal data on behalf of a controller.

Data subject - Natural person

Categories of data: Personal data and special categories of personal data

Personal data - The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

Special categories personal data - The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, religious or philosophical beliefs.

Processing - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Third party - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

2. Who is the IFA?

Registered as a Charity, the IFA's purpose is the preservation of health and wellbeing by advancing the knowledge, practice of and expertise in Aromatherapy by education, teaching and training. It sets standards of education and training in Aromatherapy, conduct and performance for practitioners so that they provide a high quality service throughout their careers. The IFA ensures all its practitioners keep their knowledge and skills up to date and commit to continual professional development. The IFA investigates complaints about its registrants and approved qualification providers and imposes sanctions for the protection of the public.



International Federation of Aromatherapists

The International Federation of Aromatherapists is the data controller registered with the Information Commissioner's Office, reference number ZA067772. This means the IFA decides how your personal data is processed and for what purposes. Our contact details are: 146 South Ealing Road, Ealing, London, W54QJ. For all data matters contact the IFA's Data Protection Officer Keely Eleftheriou at office@ifaroma.org

3. Scope

This privacy policy tells you how your personal data that is held is gathered, used, disclosed and managed and applies to information held about:

- Members
- Board and Committee Members
- Teachers
- Centre owners
- Quality Assurance Assessors
- Independent individuals involved in investigating complaints
- Specialist advisors
- Employees
- Customers who have made purchases through our online shop
- Other categories suggested above

4. What is the IFA's legal basis for processing your personal data?

Personal data (article 6 of GDPR)

- Consent of the data subject;
- Processing necessary for the performance of the IFA's regulatory function with the data subject or to take steps to register with the IFA
- Processing necessary for compliance with a legal obligation
- Processing necessary to protect the vital interests of a data subject or another person
- Processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
- Processing necessary for the purposes of the legitimate interests of the data controller or a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of the data subject

Special categories of personal data (article 9 of GDPR)

The IFA's lawful basis for processing your special categories of data:

- Explicit consent of the data subject
- Processing necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement
- Processing necessary to protect the vital interests of a data subject or another individual where the data subject is physically or legally incapable of giving consent
- Processing relates to personal data manifestly made public by the data subject
- Processing necessary for the establishment, exercise or defence of legal claims or where courts are acting in their judicial capacity



International Federation of Aromatherapists

- Processing necessary for reasons of substantial public interest on the basis of EU or Member State law
- Processing necessary for reasons of preventative or occupational medicine, for assessing the working capacity of an employee, medical diagnosis, the provision of health or social care or treatment or management of health or social care systems and services on the basis of EU or Member State law or a contract with a health professional
- Processing necessary for the reasons of public interest in the area of public health
- Processing necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes

5. Personal data we collect

The IFA collects the following data to process registrants and complainants:

- Full name
- DOB
- Photo ID (for learners)
- Qualification(s)
- Certificate(s)
- Address
- Telephone number(s)
- Email
- Website
- CV (for Teachers, Quality Assurance Assessors, Board and Committee Members, Specialist Advisors, Speakers)
- Passport (for Quality Assurance Assessors travelling overseas)
- Health Records (of a complainant and only if an investigation necessitates)
- Bank Details
- Marriage Certificate (when there is a name change)
- Doctors Certificate/Death Certificate (for learners to authorise absence from examinations)

6. The purpose(s) of processing your personal data

With reference to the categories of personal data described in the definitions section, the IFA processes personal data predominantly about those who are registered with it and who have applied to register with it and for those who are no longer registered with it. The IFA holds data about a practitioner's health and criminal convictions if they have given it this information, or if the police have notified it of a conviction. Your personal data is processed for one or more of the following purposes:

- To decide eligibility for classifications of membership
- To decide eligibility to be an approved qualification provider
- To decide eligibility to be an approved teacher
- To decide eligibility to be enrolled on an IFA qualification
- To decide eligibility to be a Board or Committee member
- To decide eligibility to be an IFA Quality Assurance Assessor
- To enable the public to check our register of qualified practitioners and their status
- To enable the public to source and check an approved qualification provider and their status
- To enable the public to source and check an approved teacher and their status
- To administer, maintain and update the practitioner, teacher and qualification provider registers



International Federation of Aromatherapists

- To process and respond to enquiries about aromatherapy and training
- To respond to complaints received about a registrant/teacher/approved qualification provider
- To process attendance at events convened by the IFA
- To communicate with registrants and customers about news, updates and events
- To process and dispatch orders made through the IFA's online shop
- To conduct surveys
- To analyse trends and compile statistics
- For audit purposes

Special categories of data

Any information you have given explicit consent to provide about your DOB, disability or gender will only be used for the purpose of statistical analysis and reported in an anonymised form on the diversity of registrants or in accordance with the Equal Opportunity and Diversity policy for learners to access IFA Qualification(s). When complaints are received that require a copy of your client record, you consent to your client record being provided to the Disciplinary Committee in order for regulatory duties to be performed and to investigate complaints.

7. Sharing your personal data

Your personal data will be treated as strictly confidential, and will be shared only for the following purposes:

- When it is in the public interest to do so
- To verify applicants' credentials with the Complementary and Natural Healthcare Council (CNHC)
- To register trustee board members with the Charity's Commission and Companies House
- In response to enquiries about aromatherapy
- In response to enquiries about IFA qualifications
- When required to do so by law
- Disclosure and Barring Scheme

The IFA shares with the public the following information about registrants and that you have provided and consented to being shared:-

- Full name
- Qualification/Category of membership status
- Areas of specialism
- City, county country and postcode of workplace
- Telephone number(s)
- Email
- Website
- Profile (for Board and Committee members, Specialist Advisors and Quality Assurance Assessors)

8. How long is your personal data kept?

Your personal data is kept for no longer than reasonably necessary. Please see Record Retention and Disposal Policy.



International Federation of Aromatherapists

9. Providing your personal data

You are under no statutory or contractual requirement or obligation to provide the IFA with your personal data. But failure to do so will have the following consequences:

- You will not be able to register with the IFA in any capacity
- You will not be able to raise a complaint with the IFA
- You will not be able to receive updates or notifications from the IFA.
- You will not be able to purchase any products from our shop
- The advice provided to you will be restricted.

10. Your rights to your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which is held about you;
- The right to request that the IFA corrects any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to request that the IFA provides you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable e.g. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request that a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable e.g. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

11. Transfer of Data Abroad

Transfer of personal data to countries or organisations outside of the EEA will only take place if appropriate measures are in place to protect the security of that data. There is generally no need to transfer data outside of the European Economic Area (EEA).

12. Automated Decision Making

The IFA does not use any form of automated decision making.

13. Further processing

If the IFA wishes to use your personal data for a new purpose, not covered by this Privacy Policy, then you will be provided with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.



International Federation of Aromatherapists

14. Direct Marketing

The IFA is subject to specific rules under the GDPR in relation to marketing its services. Data subjects have the right to reject direct marketing and the IFA must ensure that data subjects are given this option at first point of contact. When a data subject exercises their right to reject marketing the IFA will desist immediately from sending further communications.

15. Changes to this privacy policy

Any changes we may make to this Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to this Privacy Policy.

16. How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact the IFA's Data Protection Officer Keely Eleftheriou at office@ifaroma.org. If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](#) on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.