

# FICS Privacy Policy

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## Our contact details:

Organisation Name:	Fédération Internationale de Chiropratique du Sport The International Federation of Sports Chiropractic (FICS) A non-profit organisation incorporated in Lausanne Switzerland
Contact person for privacy information:	Trish Donoghue (Australia)
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## Welcome

As the leaders in sports chiropractic, we strive to provide equitable access to sports chiropractic care, education, mentoring, and research to all athletes and sports chiropractors regionally, nationally, and internationally.

Thank you for taking the time to read our privacy policy. Management of data and protection of personal information is important to us and we take privacy seriously. This privacy policy is for our members, users of our website and other individuals that interact with us. We aim to always comply with the General Data Protection Regulations (GDPR).

It is important to us to be clear about what data we collect, why we collect it and how we use it. This privacy policy explains our views and practices concerning privacy, and how they may apply to you.

## Definitions

When we talk about 'us', we mean the entity detailed in the table above, we are the operator of <https://fics.sport> and any subdomain, related blog or social media platform controlled by us (collectively called 'website'). When we talk about 'you', we mean you as a member of our organisation or user of this website or user of services we provide.

'Personal data' or 'personal information' is information that directly identifies you, such as your name and email address, or data that could be used, on its own or in combination with other data, to identify you. It does not include anonymized data.

## **Staying Anonymous**

You can browse our website anonymously, although cookies may collect information. You will not be able to access our services anonymously. Once you access our services, including for example signing up to become a member or using our services, we will begin collecting or storing your personal information in accordance with this policy.

If you submit an online enquiry, our system will collect your email address and information you enter. We will only use this information to respond to your enquiry. Your details will not automatically be added to our newsletter or similar.

Under the GDPR, we are the controller and processor of the personal information we collect about you.

### **1. Collection of Personal Data**

#### **A. Direct collection from you**

We collect personal data about you when you give it to us for an agreed purpose. This generally occurs when you:

- complete an online enquiry form
- request information (for example download a resource or ask us to send you something)
- when you apply for membership and subscribe to our newsletter
- when you register for events or activities
- when you place an order through our online services
- when you communicate with us via the phone, be email or by any other means

The more we have to do with you, the more information we will collect about you.

#### **B. Indirect collection**

We have membership arrangements with the National Council of Sports Chiropractic (NCSC) and may also have arrangements with Associated Member Organisations and select universities or colleges. If you become a member with one of these groups, you may also automatically become a member of our organisation.

In this scenario, your group, based on consent you have given them, will provide us with your name and email address so we can enter your information into our member database. We will then (based on the consent you gave to your group) send you an email attaching your membership certificate, providing you with information about us and giving you the opportunity to opt out of receiving information from us, including our newsletter.

### C. Summary of the categories of personal information we collect

We may collect and process the following categories of personal data about you:

**Communication Data** – this includes any communication that you send to us whether that be through the contact form on our website, through email, text, social media messaging, social media posting or any other communication that you send us. We process this data for the purposes of communicating with you, for record keeping and for the establishment, pursuance or defense of legal claims. Our lawful ground for this processing is our legitimate interests which in this case are to reply to communications sent to us, to keep records and to establish, pursue or defend legal claims.

**Customer Data** – this includes data relating to any purchases of goods and/or services such as your name, title, billing address, delivery address email address, phone number, contact details and purchase details (note that our payment platform handles your financial card details). We process this data to supply the goods and/or services you have purchased and to keep records of such transactions. Our lawful ground for this processing is the performance of a contract between you and us and/or taking steps at your request to enter into such a contract.

**User Data** – this includes data about how you use our website and any online services together with any data that you post for publication on our website or through other online services. We process this data to operate our website and ensure relevant content is provided to you, to ensure the security of our website, to maintain back- ups of our website and/or databases and to enable publication and administration of our website, other online services and business. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business.

**Technical Data** – this includes data about your use of our website and online services such as your IP address, your login data, details about your browser, length of visit to pages on our website, page views and navigation paths, details about the number of times you use our website, time zone settings and other technology on the devices you use to access our website. The source of this data is from our analytics tracking system. We process this data to analyse your use of our website and other online services, to administer and protect our business and website, to deliver relevant website content and advertisements to you and to understand the effectiveness of our advertising. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business and to grow our business and to decide our marketing strategy.

**Marketing Data** – this includes data about your preferences in receiving marketing from us and our third parties and your communication preferences. We process this data to enable you to partake in our promotions

such as competitions, to deliver relevant website content and advertisements to you and measure or understand the effectiveness of this advertising. Our lawful ground for this processing is our legitimate interests which in this case are to study how customers use our products/services, to develop them, to grow our business and to decide our marketing strategy.

### **Collection of Data of Minors**

Our website and member services are not intended to be used by minors nor do we intentionally collect the personal data of persons under the age of 18. If you are the guardian of a minor and suspect they may have provided us with their personal information, please contact us and request to have the minor's personal information destroyed (use the contact information in the schedule above).

## **2. How we use your personal data**

Other than as disclosed in this privacy policy, we never sell, rent or otherwise disclose your personal information to third parties including advertisers. When strategic partners contact us requesting access to our database, we do not provide access. Sometimes, if we feel the strategic partner has a service or benefit that is suitably relevant to our members, we will include information from the strategic partner in our newsletter to give members the option to connect with the strategic partner if they choose to.

We may use your personal data to:

- carry out our obligations arising from your membership or sponsorship, or any other contract entered into between you and us and to provide you with the information, products and membership services that you request from us.
- provide you with information about our work or our activities.
- fundraise in accordance with our internal policies and procedures.
- organize your participation in events you have registered for, and to provide you with information, and other materials, relating to the content of the event, the speakers, sponsors and other attendees. This may include providing your basic personal data to the event organiser.
- process contributions, sponsorships and purchases from our eLearning system.
- provide our newsletters and publications, provided you have given your consent.
- respond to your questions and provide related services.
- provide you with information about other events, products and services we offer that are similar to those that you have already purchased, provided you have not opted-out of receiving that information.
- provide you, or permit selected third parties to provide you, with information about events, products or services we feel may interest you, provided you have given your consent.

- tailor advertising that is presented to you on the Internet according to your interests, preferences and other characteristics (as described below in section 7).
- respond to applications for volunteers or others interested in our organisation.
- ensure that content from our website is presented most effectively for you and your computer.
- meet our legal obligations where we are required by law to disclose or otherwise use your information.
- administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- improve our website to ensure that content is presented most effectively for you and your computer.
- keep our website safe and secure.
- measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you.
- make suggestions and recommendations to you and other users of our website about goods or services that may interest you or them.

We may also share your personal data with:

- a member of our group
- partners, suppliers, and sub-contractors who supply services to us.
- our financial processing service providers.
- appropriate authorities where we are required by law to do so or where we have reason to believe that there has been some inappropriate interference with or use of our website, communications, services or personal or real.
- appropriate parties if we have reason to believe that one of the FICS website users, contributors, volunteers or other related parties may have been injured, may have harmed some other party or has or is likely to suffer serious harm.
- our professional advisers to obtain advice, for instance if there is a breach of the terms and conditions, or to meet our accounting or compliance obligations.
- with third party plug-ins or service providers we use to interact with you or run our website and business. For example, we use SaferPay for our payment platform and are investigating an email manager, although these will change over time as our business evolves. We are not responsible for their use of your personal information. Each of our third-party services should have their own privacy policy setting out how they deal with your information. We aim to only deal with reputable service providers.
- carefully selected third party suppliers we engage to provide services which involve processing data on our behalf, for example IT and system administration services and website developers. In this case, we will require them to use that information only to provide the services we have requested, and in compliance with the provisions of this privacy policy.

- payment third parties if there is a dispute over a payment. For example, if SaferPay contacts us regarding a dispute over a payment, we will provide them with user activity information such as IP address and activity linked to the IP address, billing details on our system, names and addresses etc to allow the payment dispute to be resolved.
- we reserve the right to fully co-operate with any law enforcement authorities or court order requiring or requesting us to disclose the identity or other usage details of any user of our online services, or in accordance with a properly executed court order, or as otherwise required to do so by law.

### **3. Testimonials and stories**

If you provide us with a testimonial, the consent you give us will allow us to use your testimonial on our website or other marketing material, together with your name, your personal image (if supplied) and testimonial wording.

If you share your story with us, the consent you give to us at the time allows us to use your story in our newsletter, on our website or in other ways we discuss with you and obtain your consent for.

You give us permission to store testimonials or stories in our secure records together with your email address, other information or images you have provided and the year in which you provided your testimonial or story. We will retain and use this information for its intended purpose for such time as your testimonial or story remains relevant to our organisation.

We process this information based on your consent which you may withdraw. If you do withdraw your consent or exercise your right to be forgotten, we will do our best to remove your testimonial or story from our website and not use it again however please understand that it cannot be removed from already printed marketing material, backup copies of websites or blogs or areas that are not within our control.

### **4. Merger or restructure**

If our website or organisation is restructured or merged with another organisation or company, your personal data may be transferred to the new entity so they can continue to support members and provide services via the website. Provided the new entity has a privacy policy that is compliant with the GDPR (or equivalent current law at the time), by agreeing to this privacy policy, you agree to such a transfer.

### **5. Data Rights**

Under the GDPR you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful

ground of processing is consent) to withdraw consent.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please email us using the information in the schedule above.

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. We may refuse to comply with your request in some circumstances however we will let you know if this is the case.

We will 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.

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.

If you request that all personal data we have collected about you be deleted from our records and erased from information stored by any third party organisations processing data on our behalf, this will not include backed up data as we are unable to isolate individual data files from our back-up. Your data will in this instance disappear on the next scheduled back up update.

If data we have collected about you is processed using automated means, you have the right to receive that data in a structured, machine-readable format and to transmit it to another data controller without hindrance.

## **6. Storage and Security of Data**

We aim to store your personal data, in a form which permits us to identify you, for no longer than is necessary for the purpose we are holding it, or for as long as is necessary to comply with our legal obligations, resolve disputes, and enforce our agreements and rights, or longer it is not technically reasonably feasible to remove it from where it is being used. Consistent with these requirements, we will try to delete your personal data quickly upon request.

We are subject to the provisions of the GDPR that protect your personal data. Where we collect your data within the European Economic Area (EEA), it is transferred for processing in other Countries (For example, Australia and the US). Our main databases are also controlled from the Countries where our administrative services and controlling body are based (currently in Australia and Switzerland however this is subject to change). Where we transfer your data to third parties outside of the EEA, we will ensure that certain safeguards are in place to ensure a similar degree of security for your personal data.

As such:

- We may transfer your personal data to countries that the European Commission have approved as providing an adequate level of protection for personal data by; or
- If we use US-based providers that are part of EU-US Privacy Shield, we may transfer data to them, as they have equivalent safeguards in place; or
- Where we use certain service providers who are established outside of the EEA, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which aim to give personal data the same protection it has in Europe.

If none of the above safeguards are available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. Our internal computers are protected behind a firewall, we do not keep hard copy records and our electronic records have security access limiting the number of people within the organisation who can access personal information of members.

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

DISCLAIMER: While we do our best to ensure the security of your data, no storage is 100% secure and we cannot guarantee the safety of your data. If you feel this is not sufficient, please do not provide us with your personal information, or, if you have already provided personal information, please contact us and we will securely destroy it.

## **7. Cookies**

We use a range of tools provided by third parties including search engine browsers and our web hosting company, to collect or view social media, app or website traffic information and to enable our website to



function smoothly. For example, we use a log-in cookie, so users do not have to enter their username and password each time they visit our site. We also use them to provide services like live chat functions. We may use tracking pixels (for example Google Analytics) to aid in measuring and tracking where our website traffic is coming from and to track the performance of our site. We may also use remarking pixels to aid in customised, targeted follow up advertising. These sites have their own privacy policies.

We use these technical and functional cookies to do tasks like identifying you when you visit our site, managing your log in, remembering your preferences, for security purposes, for analysis and to generally improve your experience and manage your sessions on our website. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. Some website features may not function properly without cookies.

The information collected by these tools may include the IP address of the device you are using and information about sites that IP address has come from, the pages accessed on our site and the next site visited. We use the information, as a legitimate business interest, to help to track your use of our online services to improve your user experience and the quality of our services. To find out how to opt out of tailored advertising please check the options available here - <http://www.networkadvertising.org/choices/>.

## **8. Contact Us**

Please let us know if you have any requests, feedback or concerns regarding the way we manage your personal data. Use the contact details listed in the below schedule. We will respond to you within 30 days and take action, within reason, as quickly as possible.

If you are not happy with how we manage your concerns, you have the right to complain to your local data protection office (DPO). For example, in Australia this is the Office of the Australian Information Commissioner, <https://www.oaic.gov.au/>. In the EEA, use this tool to find the correct office: [https://edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://edpb.europa.eu/about-edpb/about-edpb/members_en). For other regions, do a Google search to find your local DPO. We would be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

## **9. Changes to this Privacy Policy**

It is important to us that our privacy policy is regularly reviewed, and we will do so to keep it relevant and up to date with changing laws. We will notify you of any changes by posting the new policy on this page and the new terms will take effect from the date of posting. We have included a 'last updated' date at the top of the policy to help you keep track of any changes.

End.