# **A-LiNE Privacy Policy**

We respect your right to privacy. This Privacy Policy sets out details of the information that we may collect from you and how we may use that information. This Privacy Policy should be read alongside, and in addition to, the Terms and the Cookies Policy. Please read this Privacy Policy carefully.

Unless otherwise defined in this Privacy Policy, terms used have the same meaning as in the Terms.

### 1. About Us

- 1.1 In this Privacy Policy, references to "we" or "us" are to A-LiNE, an organisation whose registered office is at Level 5, Clinical Resource Building, Royal Victoria Infirmary, Queen Victoria Road, Newcastle upon Tyne NE1 4LP. Our ICO registration number is Z6173332.
- 1.2 If you have any questions about your personal information, please contact us via the address above, or via email at <a href="mailto:nuth.a-line@nhs.net">nuth.a-line@nhs.net</a>

## 2. Use of the Website and Content

This Privacy Policy applies only to your use of the Website and Content. Any Partner Institutions who provide the Content or other linking sites found on the Website may also gather information and you should consult those other parties' privacy policies as appropriate and applicable.

## 3. Collection of Information

- 3.1 When you access the Website via any means, use the Content, register or post notes, assignments or other material, respond to or participate in any survey or questionnaire sent to you by us, provide comments via the support button, or make a purchase through the Website, we may collect, store and use certain of your personal information in line with this policy. We may also ask you for information when you report a problem with the Website or the Content.
- 3.2 To register or make a purchase on the Website, we ask for your name and email address. We may also ask you about your gender and educational history or qualifications in order to understand more about you (responding to these questions will always be optional, however). When you make a purchase, our payment service provider, will also collect and

process your credit card or other payment details. If you contact us, we may also keep a record of that correspondence.

- 3.3 We may also collect data relating to your visits to the Website that cannot identify you but records your use of our Website and Content including, for example, details of how long you have used the Website and Content for.
- 3.4 We may also collect your computer's IP address in order to help us tailor the service to your location.
- 3.5 Finally, we may receive information about you from third parties (such as credit reference agencies) who are legally entitled to disclose that information.

#### 4. Use of Your Information

- 4.1 By accessing the Website via any means, using the Content, registering or posting notes, assignments or other material, or making a purchase via the Website, you agree that your personal information may be collected, stored, used and shared by us and our partners, course and content providers, or third parties we work with, for any of the following purposes:
- (a) to provide, maintain, protect and improve the quality of the Website and the Content we offer, including by conducting anonymised market research, and to protect us and our users;
- (b) to provide you with a personalised browsing experience when using the Website;
- (c) to fulfil any contractual agreements between you and us;
- (d) if you have paid to take part in an Online Course, to send you details of our other products and services which we think may interest you, unless you opt out as described at paragraph 9.1 below.
- (e) to tailor our advertising on social media to your use of the Website;
- (f) to allow you to use the full range of features on or via our Website;
- (g) to send you course-specific email notifications and updates about Courses and Content you are enrolled on;
- (h) to comply with legal and regulatory requirements;
- (i) to contact you occasionally in order to invite you to share your opinions and experiences of A-LiNE;
- (j) to collect, moderate and present reviews and ratings of our Content and Courses to be published on our Website; and

- (k) in order to provide third party goods or services available through our Website, including (but not limited to) confirmation of the Courses you have participated in and/or the award you have achieved as a result (if applicable) for accreditation or CPD purposes.
- 4.2 We may use your email address to send you course notices and updates about our Services.

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email and/or telephone with information, news, and offers on the relevant Course and Content. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

# 5. Storage of Information

- 5.1 All information is stored on our secure servers. When you register, we will ask you to choose a password which enables you to access the Online Courses and Content. You are responsible for keeping this password confidential. We ask you not to share this password with anyone.
- 5.2 In addition, we (or third parties acting on our behalf) may also store or process information that we collect about you in countries outside the European Economic Area, which may have lower standards of data protection. We have put in place technical and organisational security measures to prevent the loss or unauthorised access of your personal information. However, whilst we have used our best efforts to ensure the security of your data, please be aware that we cannot guarantee the security of information transmitted over the Internet.

# 6. Legal Basis for Processing Your Information

- 6.1 Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.
- 6.2 However, we will normally collect personal information from you only (i) where we have your consent to do so, (ii) where we need the personal information to perform a contract with you, or (iii) where the processing is in our legitimate interests and not overridden by your rights. In some cases, we may also have a legal obligation to collect personal information from you.

- 6.3 If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as the possible consequences if you do not provide your information).
- 6.4 Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

#### 7. Disclosure of Your Information

We may disclose your personal information to third parties when permitted by law including:

- (a) with your consent;
- (b) to our suppliers in order for them to help us provide our services to you, this includes:
  - universities, hospitals and other partner institutions that provide Courses or Content;
  - our provider of customer relationship management services (which allows us, for example, to send personalised email communications to you);
  - our provider of file storage and management services if you email us directly;
  - our payment services provider (as discussed at paragraph 3.2 above) when you make a purchase to process your payment;
  - these suppliers' use of your personal data may be subject to their own privacy policies, which are available on their websites, and which we suggest you familiarise yourself within the relevant circumstances set out above.
- (c) if we sell or buy any business or assets, in which case we may disclose your information to the prospective seller or buyer of such business or assets, provided that they continue to use your information substantially in accordance with the terms of this Privacy Policy;
- (d) if all, or substantially all of our assets, are acquired by a third party provided that they continue to use your information substantially in accordance with the terms of this Privacy Policy, in which case information held by us will be one of the transferred assets; and
- (e) if we are under a duty to disclose or share your information in order to comply with any legal obligation, or in order to enforce or apply our Terms and other agreements; or to protect our rights, property, or safety, our users, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## 8. Data Retention

- 8.1 We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).
- 8.2 When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

# 9. Your Rights

9.1 You have the following data protection rights:

You can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information. You can exercise these rights by contacting us using the contact details provided under the "Contact Us" heading.

You may unsubscribe from certain email communications by following the "Unsubscribe" link in the email communication itself. You may also email us at <a href="mailto:nuth.a-line@nhs.net">nuth.a-line@nhs.net</a> in order to access, correct, or update your personal information on our systems. We will answer every email as promptly as possible.

Similarly, if we have collected and process your personal information on the basis of your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

If you have any privacy-related questions or unresolved problems, you may contact us using the information provided at paragraph 14 below.

You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.

The Website may, from time to time, contain links to and from the websites of third parties. If you follow a link to any of these websites, please note that these websites have their own privacy policies. Please check these policies before you submit any personal information to these websites.

## 10. Children

We strongly believe in protecting the privacy of children. In line with this belief, we do not knowingly collect or maintain personal information from persons under 16 years of age, and no part of the Website is directed to persons under 16 years of age. If you are under 16 years of age, then please do not use or access the Website at any time or in any manner. We will take appropriate steps to delete any personal information of persons less than 16 years of age.

#### 11. Cookies

- 11.1 The Website uses cookies. Cookies are small files stored on your computer's hard drive which are used to collect your personal information. You may choose to refuse cookies but, if you do so, some of the functionality of the Website may no longer be available to you.
- 11.2 For more information about cookies, including further details as to what they are and how to refuse them, please see our Cookies Policy

# 12. Links to Third Party Websites

- 12.1 When clicking on a link within a course step or in a course email, you may be taken to a third party website, the use of which has been arranged by and is the responsibility of the course providing organisation.
- 12.2 On this website you may be asked to submit some information about yourself. Please make sure you are familiar with the terms and conditions and privacy policy of the third party website before submitting your information.
- 12.3 The course providing organisation will only use your personal information for the purpose stated in the course and in accordance with the terms of the third party website.

# 13. Updating this Privacy Policy

We may update or amend this Privacy Policy from time to time, to comply with law or to meet our changing business requirements. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. Any updates or amendments will be posted on the Website. By continuing to access the Website, using the Content or providing content in connection with the Courses and Content, your access and use will be subject to these updates and amendments.

## 14. Contacting A-LiNE

If you have any questions, comments or complaints about this Privacy Policy, please contact us using the details below:

A-LiNE
Anaesthetic Department
Level 5, Clinical Resource Building
Royal Victoria Infirmary
Queen Victoria Road
Newcastle upon Tyne
NE1 4LP

E-mail: nuth.a-line@nhs.net

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