

## **Knight Anaesthesia Ltd (CPD Oxford)**

### **Privacy and Cookies**

#### **Privacy policy**

At Knight Anaesthesia we respect the privacy of our delegates and visitors to our website. We take our duty to process your personal data very seriously. This policy explains how we collect, manage, use and protect your personal information when you visit our website and/or if or attend an Knight Anaesthesia event.

The processing of personal data shall always be in line with the General Data Protection Regulation (GDPR), The Data Protection Act 2018, and Privacy and Electronic Communication Regulations (PECR).

We may change this document from time to time to reflect the latest view of what we do with your information. Please check back frequently; you will be able to see if changes have been made by the date it was last updated.

Refer to the sections below for more details on how and why we use your personal information.

#### **1. Who are we?**

Knight Anaesthesia is a Ltd company formed in 2021. Its primary purpose is to provide high quality private anaesthesia services to patients in the oxford region, carried out by director Dr Henry Jefferson. In the Since 2023 it has also carried out CPD days for medical professionals, utilising the expertise within the Oxford region to provide high quality, low cost CPD to health professionals in the UK and beyond. In the near future the CPD activities of the company will transfer to the company 'CPD Oxford' which has been incorporated for the purposes of continuing this role.

#### **2. What personal data we collect and how we use it**

Knight Anaesthesia is a 'controller' of the personal data you provide to us. We will usually collect basic data about you like your name, postal address, telephone number, and email address when you attend an event. Payment information including bank details and debit/credit card details are processed and held via a third party (PayPal Ltd and/or Stripe Ltd) if payment is made via the website. Bank details for those paying via BACS are held on our secure banking system (Natwest) and not elsewhere.

## **Why we need it**

We collect information depending on the relationship we have with you but typically this would be:

- When you purchase products, services, or attend events either online, over the phone, via fax, post or at an Knight Anaesthesia event
- When you create a registered user account for our website
- When you engage with us on social media
- When you contact us by any means with queries, complaints etc
- When you ask one of our team to email you information about products and services we offer
- When you register for any kind of course or event with us
- When you apply for any grants, bursaries or awards
- When you choose to complete any surveys we send to you
- Photographs and videos of delegates attending our events

The information is either needed to fulfil your request or to enable us to provide you with a more personalised service. You don't have to disclose any of this information to browse our website. However, if you choose to withhold requested information, we may not be able to provide you with certain services.

The personal data we collect may be used for the following purposes depending on the relationship we have with you:

- Processing an application and ongoing essential related processing
- Sending you information about Knight Anaesthesia, our activities, and campaigns and for marketing purposes (including via Facebook, Twitter, and other social media channels)
- Processing a purchase that you have made
- Responding to correspondence you have sent to us

We are committed to ensuring that the information we collect, and use, is appropriate for this purpose, and does not constitute an invasion of your privacy.

The legal basis we use under the General Data Protection Regulation for the processing of personal data:

- Fulfilling our contractual obligations to you
- Our legitimate interests as Knight Anaesthesia
- Your consent
- Any legal requirement we may have

### **Processing to fulfil the event contract**

When you sign up to an Knight Anaesthesia event, we use your personal information to provide the services you have paid for. Data we hold will be used confidentially, and to help us run our services and keep you informed – for example to collect subscriptions, mail out publications, and let you know about conferences and events; or to fulfil legal or regulatory requirements if necessary.

We will use this data to send essential communications to you in regards to services you have paid for, including events, and access to other benefits and services.

Communications will be relevant, timely and not excessive.

Knight Anaesthesia will never sell, trade, rent, exchange or otherwise share your personal information with any other person, company or organisation unless necessary to fulfil our contractual responsibilities, we have a legal obligation to do so, or without gaining consent to do so.

### **Data security**

The information you provide will be held securely by us and/or our data processors, whether the information is in electronic or physical format. We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary.

### **Email marketing**

In relation to any email marketing that you may receive from us, either at your request or in any other circumstances, we may monitor whether you open and/or click on any links in such emails and we use various tracking techniques to measure the effectiveness of our email campaigns and tailor our communications to your interests. If you no longer wish to receive these emails, you can unsubscribe directly by requesting this from us via email.

### **Building profiles of delegates**

Knight Anaesthesia may make use of profiling and screening methods to produce relevant communications and provide a better experience for our delegates. Profiling can help us target our resources more effectively through gaining an insight into the background of our delegates and helping us to build relationships that are appropriate to their interests.

If you do not wish your data to be used in any of the ways listed above or have questions about this, then please email [henry@oxfordcpd.com](mailto:henry@oxfordcpd.com).

## **Volunteering**

When you volunteer for Knight Anaesthesia, we will keep you up to date with the work that we are doing and events we are involved with. We will also let you know of any changes that might affect you volunteering with us and which you need to be aware of. We will only use this information in relation to your volunteering with us and while you remain a volunteer with us. By agreeing to volunteer, you are agreeing to us sending you emails about volunteering and your volunteer role.

## **Anything else?**

All the personal data we process is processed by our staff in the UK and for the purposes of IT hosting and maintenance is normally situated within the European Economic Area (EEA). On occasions where it is necessary for this to be situated outside of the EEA it will be done in accordance with guidance issued by the Information Commissioner's Office.

If you would like to change the way you hear from us or no longer wish to receive direct marketing communications then email [henry@oxfordcpd.com](mailto:henry@oxfordcpd.com).

## **3. Legitimate interests**

We have a number of lawful reasons that mean we can use (or 'process') your personal information. One lawful reason is something called your 'legitimate interests'. Broadly speaking legitimate interests means we can process your personal information if:

- We have a genuine and legitimate reason **and**
- We are not harming any of your rights and interests

When you provide your personal details to us we use your information for our legitimate business interests to carry out our work to promote the advancement of public education in the science and practice of anaesthesia, as well as promote research and the development of new techniques. By doing this, though, we will also carefully consider and balance any potential impact on you and your rights.

We will also hold information about you so that we can respect your preferences for being contacted by us.

#### **4. Processing using consent**

There are certain circumstances, particularly in regard to electronic marketing communications where we may need consent from you, in order to process your data. If this is the case we will ensure that the consent you provide is by a clear affirmative act establishing a freely given, specific, informed and unambiguous indication of your agreement to the processing of personal data relating to you.

Knight Anaesthesia is monitoring future developments in EU and UK electronic marketing regulation presently being debated and subject to change.

#### **5. Sharing your information**

We only disclose information to third parties or individuals when obliged to by law, for purposes of national security, taxation, criminal investigations, professional regulatory body investigations and the following:

- When we use other companies to provide services on our behalf e.g. mailing or delivering orders, sending mail and emails, providing access to apps, customer analysis, assessment and profiling, when using auditors/advisors or processing credit/debit card payments
- If we receive a complaint about any content you have posted or transmitted to or from one of our sites, to enforce or apply our terms and conditions or if we believe that we need to do so to protect and defend the rights, property or personal safety of Knight Anaesthesia, our websites or our visitors or for other lawful purposes
- We may disclose aggregate statistics about our site visitors, delegates, and sales to describe our services and operations to prospective partners and other reputable third parties and for other lawful purposes, but these statistics won't include any personally identifying information
- If we run an event in partnership with other named organisations your details may need to be shared. We will be very clear what will happen to your data when you register

We will never sell or rent your personal information to other organisations. Knight Anaesthesia will share your personal data with third parties only for the purposes of essential sub-contracted processing. We will seek assurances that these contractors/processors have in place appropriate technical and organisational measures to safeguard the security of your data.

## **6. Retaining your information**

We hold your information only as long as necessary for each purpose we use it.

## **7. Your details on the web: our cookie policy**

We use web analytics tools provided by service partners such as Google Analytics to collect information about how you interact with our website or mobile applications, including what pages you visit, what site you visited prior to visiting our website, how much time you spend on each page, what operating system and web browser you use and network and IP information. We use the information provided by these tools to improve our services. These tools place persistent cookies in your browser to identify you as a unique user the next time you visit our website. Cookies are small text files that are placed on your computer or mobile phone when you browse websites.

Our cookies help us:

- Make our website work as you'd expect
- Remember your settings during and between visits
- Improve the speed/security of the site
- Continuously improve our website for you
- Granting us permission to use cookies

Each cookie cannot be used by anyone other than the service provider (eg: Google for Google Analytics). The information collected from the cookie may be transmitted to and stored by these service partners on servers in a country other than the country in which you reside. Though information collected does not include personal data such as name, address, billing information, etc., the information collected is used and shared by these service providers in accordance with their individual privacy policies.

## **8. Your privacy rights explained**

At any point while we are in possession of or processing your personal data, you, the data subject have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you free of charge
- Right of rectification – you have the right to correct data that we hold about you that is inaccurate or incomplete

- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing
- Right of portability – you have the right to have the data we hold about you transferred to another organisation
- Right to object – you have the right to object to certain types of processing such as direct marketing
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling

### **9. Other websites**

On occasion our website will contain links to other websites. This privacy policy only applies to the Knight Anaesthesia website. When you link to other websites you should read their own privacy policies.

### **10. Changes to our privacy policy**

We keep our privacy policy under regular review and we will place any updates on this web page. This privacy policy was last updated on 28th September 2018.

### **11. How to contact us in regards to your rights, or to make a complaint**

In the event that you wish to make a complaint in regards to how your personal data is being processed by Knight Anaesthesia, please contact us at [henry@oxfordcpd.com](mailto:henry@oxfordcpd.com). If you are unhappy with how your complaint has been handled you have the right to lodge a complaint directly with the ICO.