



03/06/2019

# **PRIVACY NOTICE OPEN ENROLMENT ONLINE REGISTRATION**

# PRIVACY NOTICE - OPEN ENROLMENT REGISTRATION (ONLINE)

THE FAMILIES FOUNDATION IS COMMITTED TO PROTECTING AND RESPECTING YOUR PRIVACY, HAVING REGARD TO APPLICABLE DATA PROTECTION AND PRIVACY LAWS, INCLUDING THE GENERAL DATA PROTECTION REGULATION (REGULATION (EU) 2016/679) (“GDPR”).

IN ORDER TO REGISTER TO ATTEND ONE OF OUR COURSES, YOU MUST COMPLETE AN ONLINE REGISTRATION THROUGH WHICH WE COLLECT SOME OF YOUR PERSONAL DATA. WE ARE GIVING YOU THIS PRIVACY NOTICE TO TELL YOU WHO WE ARE AND TO EXPLAIN WHAT PERSONAL DATA WE ARE COLLECTING, WHY WE ARE COLLECTING IT AND HOW YOUR DATA WILL BE USED. THIS PRIVACY NOTICE ALSO PROVIDES YOU WITH INFORMATION ABOUT THE RIGHTS YOU HAVE WITH RESPECT TO YOUR DATA.

## WHO WE ARE

The Families Foundation is a global not-for-profit that works with organisations to support and strengthen families. Our postal address is Koninginneweg 97, 1211 AP Hilversum, Nederland.

We have a global strategic partnership with Triple P International Pty Ltd (“TPI”) and have a licence to disseminate the world’s most extensively-researched parenting programme; the Triple P – Positive Parenting Program® (“Triple P”). Triple P is a parenting and family support strategy developed by Professor Matthew Sanders and colleagues at The University of Queensland in Brisbane, Australia. Triple P aims to prevent severe behavioural, emotional and developmental problems in children by enhancing the knowledge, skills and confidence of parents and is designed for use by a variety of health, education and social care professionals.

For more information about the Families Foundation, please visit our webpage: [www.familiesfoundation.net/en/about/who-we-are/](http://www.familiesfoundation.net/en/about/who-we-are/).

The Families Foundation is the data controller for the data collected when you register to attend one of the Triple P courses that we facilitate. This means that the Families Foundation will make the decisions about how and why your personal data, collected at registration, is processed.

If you have any questions about our use of your personal data or our data protection practices, please send these to our Data Protection Officer using our postal address or the email address [dpo@familiesfoundation.net](mailto:dpo@familiesfoundation.net). Where possible, we ask that correspondence for the Data Protection Officer be sent by email.

## THE PERSONAL DATA WE COLLECT

When you apply to attend one of the Triple P courses which we facilitate, we collect a limited amount of your personal data. This includes:

1. Your name;

2. Your mobile phone number;
3. Your email address;
4. Your position;
5. Whether you have previously undertaken Triple P training;
6. If you work in a region with a Stay Positive subscription. If you do, we ask for the region in which you work; and
7. Information about the organisation you work for including its name, address, post code, city, as well as the name of your local coordinator or manager and their contact email address.

Some of the information fields are mandatory. These are marked with an Asterisk(\*). This data is essential for us to be able to process your registration. Providing the other data is discretionary. If you provide the discretionary information, this will enable us to provide a higher level of service to you in processing your registration.

We will also collect billing information. The billing information may be your personal data, if you are paying for the course yourself. The billing information collected includes the billing and invoicing address as well as the payee's preferred contact phone number and email address. We only accept payment by electronic funds transfer. We do not accept payment by cheque or credit card and so do not collect this type of information.

At the training session, you will be provided with a bundle of forms. These forms collect limited personal data. You will be provided with a separate Privacy Notice at the training event, that will explain how that data will be used.

## WHY WE COLLECT THIS DATA

We use your personal data to facilitate and manage your attendance at the relevant Triple P training session. This includes, for example:

- > Providing the Trainer with the names of the people who will be attending the course; and
- > Sending you information approximately 2 weeks before the training session, such as the time and location of the session. We will also invite you to disclose any special dietary requirements or disabilities that you would like us to accommodate, if possible. A separate Privacy Notice will be provided to you at that time, which will explain how we will use and protect that data.

The legal basis of our holding and processing your personal data in this way, is the performance of the contract to provide you with the Triple P training.

We may also use some of your contact information for promotional purposes. This will only occur when we have a lawful basis to process your data in that way. Depending on the circumstances, the lawful basis will likely be your consent or our legitimate business interest. At the training session, we will ask for your consent to receive electronic direct marketing messages by email. Where we obtain your consent to use your data in a certain way, you may withdraw your consent at any time by contacting the Data Protection Officer at [dpo@familiesfoundation.net](mailto:dpo@familiesfoundation.net). However, please be aware that if you withdraw your consent, this will not affect the lawfulness of the processing that was conducted before the withdrawal of your consent.

We will collect your billing information but not your banking/payment information. The information we collect is needed to create a customer record and invoice. Your billing information will be provided to TPI, the data processor, who will use it for the purpose of facilitating the payment for the course. The legal basis of our processing your personal data to effect payment, the performance of a contract.

## HOW YOUR INFORMATION WILL BE STORED AND USED

We will not use your personal data to make any automated decisions that might affect you. We will process the data for the purposes set out above.

The personal data you provide through this online registration, will be stored in a variety of IT systems. The registration page is hosted by a third-party service provider; Formdesk. Their privacy statement is available at <https://en.formdesk.com/privacy-statement/>. The statement explains that the data collected through the online form will be stored in a database on their server, which is within the EU. Formdesk's privacy statement provides information about how they protect the data captured through their web forms, including that they use encrypted email messages when sending the data to the data controller.

The email from Formdesk containing your personal data, is sent to our Training Coordinator. Emails sent to the Families Foundation are stored on our strategic partner TPI's private server, which is located in Brisbane, Australia. The European Commission may make Adequacy Decisions, when it recognises that a country outside of the EU has an adequate level of data protection. There is not an Adequacy Decision in respect to Australia. This means that the European Commission does not believe Australia's data protection laws are comparable to the laws of the EU. However, the Families Foundation believes that TPI's private server is an appropriate place to store our email data. TPI is doing its utmost to protect your data, with regard to the GDPR. It has put robust electronic and physical security mechanisms in place to protect its private server. The information on the server is not encrypted in transit or at rest, but it is encrypted where the TPI server is accessed remotely.

The data will also be stored in Filecloud, an online database which is hosted from a server in the EEA.

## HOW WE SHARE YOUR INFORMATION WITH OTHERS

Your information will always remain confidential. We will not sell, rent or license your information. We will however share it with other entities in limited circumstances.

### With TPI

We are a small, not-for-profit organisation. We have a strategic partnership with TPI, which greatly assists with our ability to operate. In providing this assistance, TPI processes data on our behalf. TPI's assistance includes providing services for some of our key functions including Finance, Human Resources and IT. We also utilise IT infrastructure such as the TPI private server, which we have explained above.

We may also provide your personal data to TPI for their own use, in order to facilitate, manage and retain a record of your attendance at the training session. TPI will be the data controller with respect to this data. TPI has a legitimate interest in ensuring that any Triple P training and/or accreditation courses are run effectively and in retaining a record of all practitioners who are trained in the delivery of the Triple P program, including those in the Netherlands. The information shared with Triple P will be stored in their internal customer relationship management (CRM) system. TPI uses a private database to house the CRM system. The database is stored in a private third-party data warehouse located in the USA. The third-party has extensive data security mechanisms in place including the encryption of data in transit and in back-up. There is an Adequacy Decision with respect to the USA. This means that the EU Commission has recognised that the USA has comparable data protection regulations in place.

TPI will not sell, rent or license your information. For more information about their data protection principles please see the Privacy Policy on their website [www.triplep.net](http://www.triplep.net) or contact their Data Protection Officer at [dpo@triplep.net](mailto:dpo@triplep.net).

### With Other Organisations or Individuals

In limited circumstances we may share your personal information with service providers, as part of providing our services to you. For example:

- > Your name may be shared with the venue where the training session will be held, so that they can prepare induction material for the course attendees;
- > Some of your information will be shared with the Trainer(s) who will run the course, including your name and any other Triple P courses you have attended. This will assist the Trainer in providing the course. The Trainers are independent contractors. All of the Trainers have completed training on the GDPR and are aware of their data protection and privacy obligations;
- > We may disclose your information to service providers where it is necessary for the storage of the data or for the maintenance of the data or IT systems where the data is stored. These service providers would typically include IT contractors or database designers;
- > We may disclose your information to service providers for promotional purposes, provided we have a lawful basis to do so. The lawful basis will be either your consent or our legitimate interests; and
- > We may disclose your personal data to a third party, including a lawyer, when necessary to enforce our legal rights or if legally compelled to do so by a court or governmental entity.

## HOW LONG WE KEEP YOUR INFORMATION

The Families Foundation will only keep your personal data for as long as is necessary, to achieve the purposes mentioned above or comply with legal obligations. For more detailed information about our data retention periods, please contact our Data Protection Officer.

TPI will keep a record of your attendance at the course on an indefinite basis, as they have an ongoing need to maintain a complete register of all practitioners who are trained in using Triple P in their clinical practice.

## YOUR RIGHTS REGARDING YOUR INFORMATION

You are entitled under the GDPR to certain information and have various rights regarding how the Families Foundation uses your data, including the right to:

- > Access your information;
- > Rectification (to ask us to amend or update your personal data if it is incomplete or inaccurate);
- > Erasure;
- > Restrict the processing all or some of your information (in certain circumstances);
- > Object to our processing your personal data (in certain circumstances);
- > Data portability;
- > Not be subjected to automated decision making; and
- > Withdraw your consent.

For more information about your rights under the GDPR, please contact our Data Protection Officer.

## YOUR RIGHT TO COMPLAIN

You also have a right to complain about us to a relevant supervisory authority. If you have a complaint about our use of your personal information, we ask that you please contact us first and give us an opportunity to resolve the complaint. If you would like to contact the supervisory authority, you can contact the Autoriteit Persoonsgegevens:

- > By email: [info@autoriteitpersoonsgegevens.nl](mailto:info@autoriteitpersoonsgegevens.nl)
- > By post: Prins Clauslaan 60, P.O. Box 93374, 2509 AJ Den Haag

More information is available on their website: <https://autoriteitpersoonsgegevens.nl/>.



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## ANY QUESTIONS OR CONCERNS

If you have any questions or concerns about our use of your personal data please contact our Data Protection Officer at [dpo@familiesfoundation.net](mailto:dpo@familiesfoundation.net).