Privacy Policy

1. Introduction

This privacy policy concerns how the Tree of Life collects, processes, stores and shares member's data.

This Privacy Policy only relates to personal data collected by the Tree of Life via the Tree of Life website, application forms, emails and telephone calls. Any personal data collected by the Tree of Life is used in accordance with UK data protection legislation.

Users should be aware that if they access other websites using the links provided, these are outside our control. If they provide personal data to other companies, the privacy policies of those companies determine the uses to which that information is put, and the Tree of Life Privacy Policy will no longer apply.

2. The Data Protection Bill 2017

The Tree of Life complies with the principles of the <u>Data Protection Bill</u> 2017 in accordance with <u>General Data Protection Regulations (GDPR)</u>.

3. Purpose of data

The data we collect from members is the data required to provide professional services to members, communicate with members and validate and verify the legitimacy of clients. The data held by Tree of Life is collected at the time of application by members and includes name, surname, home address, clinic address, email, phone number(s), website, certificates of qualifications and records of continued professional development.

4. Disclosures - Sharing of data

We may disclose your personal information (including to trusted third parties) for the purposes for which it is primarily held or for a related secondary purpose. In some cases, we may disclose information without your consent. Your personal and sensitive information may be disclosed to Tree of Life employees, representatives, and service providers we use to deliver aspects of our service, such as a database or email software facilities.

Data is shared via member numbers with insurance providers for the purposes of verifying the legitimacy of insurance applicants.

Data is shared upon request on behalf of a member with external companies that provide practitioner services to verify qualification and status claims.

Data is shared with our regulator, the General Naturopathic Council, to register practitioners on a public register and confirm their status as fully qualified, voluntarily regulated practitioners.

Data is shared internally with administrators for the purpose of verifying payments and refunds.

5. Legacy data

Applicants to Tree of Life accepted or otherwise, are kept on record for up to 3 years. Applicants who have been barred, banned or otherwise excluded from membership are kept on record to prevent renewed access to the Association in keeping with the interests of public safety.

6. Device-specific data

The following information may be collected through your device and browser:

- Your devices IP address (collected and stored in an anonymised format)
- Your email address, including first name and surname
- Device screen size
- Device type (unique identifiers) and browser information
- · Geographic location (country only)
- · Preferred language used to display the webpage

7. Digital Log data

Our servers automatically record information which is created using our software. Data includes:

· Referring domain

- Pages visited
- Geographic location (country only)
- Preferred language used to display information
- Date and time when pages were accessed or created

8. Consent

Tree of Life membership is an optional process. By joining Tree of Life, members consent via their application to receive information relating to the activities of Tree of Life in the form of newsletters, regulatory updates, upcoming seminars, webinars, events, training, special offers and information relevant to the profession.

9. Opting out

Opt-out mechanisms are in place on all Tree of Life mailings and communications. Users can choose to opt out at any time by clicking the opt-out button at the bottom of mailings or emailing Tree of Life directly with a request to opt-out.

10. Use Made of Personal Information

Personal information provided to the Tree of Life will be used to provide services to our members. Any personal information that the Tree of Life collects will be used by the Tree of Life only in accordance with current data protection legislation.

In addition, personal information may be used for statistical analysis.

Personal data will be collected and processed by the Tree of Life for the following purposes:

- (1) To process your membership
- (2) Administration
- (3) To validate and confirm your insurance application
- (4) To validate and confirm your rights to access free and discounted offers with external companies

- (5) To validate and confirm your status (at your request) to external companies
- (6) To process CPD certificates
- (7) To register your attendance at Tree of Life events
- (8) To record complaints or misdemeanours.

Processing personal data for the above purposes may entail sharing the information with employees, contractors, agents, professional advisors, and regulators of the Tree of Life.

Written agreements exist between the Tree of Life and such parties that there must be no further disclosure of such personal data.

11. Consent

By providing personal data to the Tree of Life, users consent to processing such data by the Tree of Life as described in this Privacy Policy.

12. Verifying, updating and amending your personal information

If, at any time, a user wants to verify, update or amend their personal data, they may write to:

Miroslav Petrov

Tree of Life

atreeoflife@myyahoo.com

(+44) 7455 763274

Verification, updating or amendment of personal data takes place within ten working days

13. Storage of personal data

Data is stored in a secured, encrypted, cloud-based database. Payments are processed according to the requirements of 12.9 PCI DSS v3.2 in accordance with <u>PCI security standards</u>.

14. Processing of data

Personal and financial data is processed and handled via Amazon Web Services (AWS), the world's largest cloud provider with recognised certifications and audits PCI DSS Level 1, ISO 27001, FISMA Moderate, FedRAMP, HIPAA and SOC 1, SOC 2 and SOC 3 audit reports.

All personal data is fully backed up and stored in highly secure AWS data centres with 24/7 infrastructure monitoring, with immediate notification and recovery in place in the event of a data breach.

PayPal is used to process payments for memberships and sponsorships. All PayPal transactions are subject to the <u>PayPal privacy policy</u>. All data handled by PayPal is held securely by a single data controller for administrative purposes.

15. Cookies

A "cookie" is a small text file that is placed on a user's computer hard drive by a website. There are several types of cookies; the most common are 'session' cookies. These are used to keep track of information a user needs as they travel from page to page within a website. These cookies have a short lifetime and expire within a few minutes of the user leaving the site.

Other types of cookies can be used to track internet activity after the user has left a website. These are usually sponsored by organisations external to the website being visited and are generally known as 'third party' cookies. These usually have a long lifetime with several months being quite common. They are 'harvested' and 'refreshed' whenever the user visits a page where the same or a similar cookie is being used.

The Tree of Life uses benign, short lived 'session' cookies to tell whether a website user has logged in, where to find details that can be used to pre-fill parts of online forms and to personalise the user's visit to the website.

Tree of Life cookies do not analyse visits to other websites or any searches undertaken whilst on the Tree of Life website.

Internet browsers normally accept cookies by default; however, setting a browser to reject cookies is possible. If this is done, it is important not to exclude the benign and useful session cookies. Choose an option that rejects all third-party and long-lived cookies.

The Tree of Life uses cookie free technology that uses Internet Protocol (IP) information exchanged during the course of normal web activity combined with data enhancement technology to get detailed analytics information.

16. Links to Third Party Websites

This Privacy Policy applies solely to the personal data collected by the Tree of Life and does not apply to third-party websites.

The Tree of Life is not responsible for the privacy policies of third-party websites. The Tree of Life advises users to read other websites' privacy policies before registering personal data.

17. Security

The Tree of Life holds your personal data in accordance with the security provisions of the UK data protection legislation.

If you have any questions about security, don't hesitate to get in touch with the Tree of Life on +44 7455 763274

18. Notification of Changes

The Tree of Life will notify all users of any changes it makes to its Privacy Policy. If the Tree of Life decides to change its Privacy Policy, it will post such changes on this page so that you are always aware of how the Tree of Life uses your personal data.

Users have the right to ask the Tree of Life, in writing, for a copy of all the personal data held about them upon payment of a fee ("subject access request") and to request that the Tree of Life correct any inaccuracies in that information.

19. Your rights over your data

You have the right to rectify, amend, correct or erase your data except where there is a <u>legal basis for refusal</u>.