Privacy Policy for the World Federation of Occupational Therapists

1. WHO ARE WE?

The World Federation of Occupational Therapists (WFOT) is the official representative of occupational therapy and occupational therapists worldwide. Founded in April 1952, the WFOT was recognised as a Non-Government Organisation (NGO) by the United Nations in 1959. WFOT allows members to be actively engaged in promoting the development and growth of the profession around the world and actively pursues the maintenance of professional standards, particularly those relating to undergraduate education. This is in partnership with each countries national occupational therapy body, who contribute as member organisations to the direction, effort and success of the world federation. You can find out more about WFOT at https://wfot.org/about/history.

WFOT owns and operates http://www.wfot.org, https://congress2018.wfot.org/, https://dmot.wfot.org/ and https://otion.wfot.org/ (the 'websites' or 'website'). These have been setup to provide members and the public information and services. For the purposes of data protection legislation, WFOT ("we", "us" or "our") are the data controller for the websites and membership information supplied from each country Occupational Therapy National Association. We are contactable by post and email using the information below:

World Federation of Occupational Therapists

PO Box 53187

London

United Kingdom

E18 9DF

Email: admin@wfot.org

Our Data Protection Officer is the Executive Director. You can contact the Executive Director using the postal or email contact information above. Please mark any correspondence with 'Data Protection Officer'.

This privacy policy covers all the information provided on the websites and what to expect us to do with your personal information when you contact us or use one of our services. By visiting the website and/or by supplying any personal data to WFOT, you are accepting and consenting to the practices described in this policy, including WFOT's use of cookies as explained below. If you do not agree with these terms, then do not use this website or its resources.

2. INFORMATION WE COLLECT AND HOW WE USE IT

To provide information and services to you WFOT will collect and process personal information provided by you:

Becoming a Member of WFOT. If you decide to join WFOT you will provide your personal information to your National Association along with a payment, or this will be included as part of joining your National Association. The National Association securely pass the information required by WFOT to set up your membership. This is so we can carry out your request to become a member of WFOT and forms an agreement between you and WFOT. For EU data protection law our lawful basis for processing data for this purpose is Article 6, (1)(b) processing is necessary for the performance of a contract to which the data subject is party.

Sale of, and access to, goods and services: WFOT also process personal data to execute the sales of goods and services through their websites. This includes the sale of goods through http://www.wfot.org, the Online Disaster Management Course https://dmot.wfot.org/ and the World Congress through https://congress2018.wfot.org/. To carry out your requests for these goods and services we must process the personal information you provide. For EU data protection law our lawful basis for processing data for this purpose is Article 6, (1)(b) processing is necessary for the performance of a contract to which the data subject is party.

Registration and access to the online forums: To fulfil your request to access the online forum (https://otion.wfot.org) you enter into an agreement with WFOT and we capture and process a set of personal information provided by you. For EU data protection law our lawful basis for processing personal data for this purpose is Article 6, (1)(b).

To Send members a quarterly newsletter and marketing information: If you decide to sign up to our newsletter via our facebook page www.facebook.com/thewfot you provide a set of personal information so we can add you to our mailing list. By signing up you consent to us sending you a newsletter and relevant marketing information. For EU data protection law our lawful basis for processing personal data for this purpose is consent under Article 6, (1)(a).

Further examples of the uses made of your information. Often, we also record the IP address used when you use our services. This to ensure that activity is legitimately created by a human and not by a script/computer.

You may also be asked to disclose personal information to us so that we can provide assistance and information to you. Such data is used to provide online technical support and troubleshooting.

Information automatically collected when visiting one of our websites. We may also collect information about your computer. Examples of information we may track include:

- Your Internet protocol address.
- · The kind of browser or computer you use.
- · Number of links you click within the site.
- · City or country from which you accessed the site.
- · Date and time of your visit.
- · Name of your Internet service provider
- Web page you linked to our site from.
- Pages you viewed on the site.

This is statistical data about our users' browsing actions and patterns which does not identify any individual and allows us to ensure that content from our site is presented in the most effective manner for you and for your computer.

3. COOKIES

We may use cookies to personalize or enhance your user experience. In particular, we use Google Analytics cookies for the purposes of managing the performance and design of the site. A cookie is a small text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you and can only be read by a web server in the domain that issued the cookie to you.

One of the primary purposes of cookies is to provide a convenience feature to save you time. For example, if you personalize a web page, or navigate within a site, a cookie helps the site to recall your specific information on subsequent visits. Hence, this simplifies the process of delivering relevant content and eases site navigation by providing and saving your preferences and login information as well as providing personalized functionality.

We use the following cookies:

- · Strictly necessary cookies. These are cookies that are essential in order to enable you to move around the website and use its features, such as accessing secure areas of the website.
- · Analytical cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. All information these cookies collect is aggregated and therefore anonymous. This helps us to improve the

way our website works, for example, by ensuring that users are finding what they are looking for easily.

· Functionality cookies. These are used to recognise you when you return to our website and to remember choices you make and provide enhanced, more personal features.

You can accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies. Please see https://allaboutdnt.com/ to adjust your settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, please visit www.allaboutcookies.org. To opt out of being tracked by Google Analytics across all websites visit http://tools.google.com/dlpage/gaoptout. If you reject cookies by changing your browser settings, then be aware that this may disable some of the functionality on our website.

4. WHERE WE STORE YOUR PERSONAL DATA

The data that we collect from you is transferred and stored within the United Kingdom (UK), the United States and Australia. It is processed by staff operating within the EU and Australia who work for us under contract or for one of our suppliers. This includes staff engaged in, among other things, the provision of support services. Once we have received your information, we will use strict procedures and security features to prevent unauthorised access, disclosure or loss of your data. We will retain your data only for as long as we have a business need to, after which it is securely removed from our systems as per our data disposal policy.

Our suppliers providing data storage services undergo regular audits of their facilities to ensure their information security complies with international standards and meets our contractual requirements.

By submitting your personal data, you agree to this transfer, storing and processing. We will take all steps necessary to ensure that your data is treated securely and in accordance with this privacy policy.

If you want to find out more about how your information is stored and who is involved, please get in touch using the contact details provided in this policy.

5. WHO WE SHARE YOUR DATA WITH

To provide you goods and services, WFOT works with a range of suppliers. These third parties operate under contract with WFOT and we will share your information with these parties where it is necessary to deliver the goods and services you have requested.

These suppliers are data processors under data protection law and can only process your information in line with the instructions we provide in their contract. These include specific clauses to protect your personal information. They will not share your personal information with any organisations apart from us. They will hold it securely and retain it for the period we instruct.

Many of our suppliers are registered with the EU:US Privacy Shield. This is a commitment from our US suppliers to protect your personal information and that they will comply with a set of internationally agreed standards. Participating organisations submit to monitoring by the Department of Commerce and agree to be subject to program's enforcement and redress mechanisms. You can find out more about the Privacy Shield here: https://privacyshield.gov

We will not share your information with any third parties for the purposes of direct marketing.

In some circumstances we are legally obliged to share information. This would relate to regulators, law enforcement bodies, government agencies, courts or other third parties where we think it's necessary to comply with applicable laws or regulations, or to exercise, establish or defend our legal rights. Where possible and appropriate, we will notify you of this type of disclosure.

6. YOUR RIGHTS

Links. Our sites (ending in www....wfot.org), from time to time, may contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Access rights. You have the right to access information we hold about you. Your right of access can be exercised in accordance with the General Data Protection Regulation (GDPR) or applicable data protection law at any time by contacting us via the contact details provided in this policy and that can be found at: https://wfot.org/contact-us

Data Rectification/Erasure. You have the right to have your data rectified if you believe it is inaccurate and/or erased if you believe it is no longer necessary for us to process your data or you have withdrawn your consent (where consent was given to process data in the first place). Please use the contact page to make this request.

Data portability. You can request access to your data, and for the data to be provided to you in an accessible format (e.g. in a word processing document or spreadsheet) at any point. Please use the contact page to make this request.

The Right to Object. You have the right to object to your data being processed by us and can request that it is no longer processed. If required, please use the contact page to make this request.

Data retention policy. When you use WFOT services your information is stored securely on our servers for as long as we have a business need for it. To request that your information be deleted as you do not wish to use or receive our services anymore, please contact us using the contact details on https://wfot.org/contact-us

Report a Concern. You have the right to report a concern or lodge a complaint with your supervisory authority (who oversee data protection in your country) if you believe there are grounds to do so and have a concern about how your information is being processed. Please contact your National Association to find out who your supervisory authority is for any data protection concerns.

7. EMAILS FROM WFOT

Emails and information transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you are not the intended recipient, please delete it and notify the sender.

Views expressed in the message and any attachments are those of the individual sender and are not necessarily the views of the World Federation of Occupational Therapists (WFOT). While all email messages sent by WFOT are scanned for viruses, WFOT can accept no liability for any consequential damage resulting form emails containing computer viruses.

8. CHANGES TO THIS STATEMENT

WFOT has the discretion to update this privacy statement at any time. We will make a good faith effort to notify the public of any changes. We encourage you to periodically review this privacy statement to stay informed about how we are helping to protect the personal information we collect. Your continued use of the service constitutes your agreement to this privacy statement and any updates.

This document was last updated 29/10/2018.

9. CONTACTING US

If you have questions, comments, and requests regarding this privacy policy, please use the contact page to let us know.