



# Privacy Policy

## The Property Inst. Limited

The Property Inst. Limited ("TPI") incorporates the Institute of Residential Property Management Limited ("IRPM") and the Association of Residential Managing Agents Limited ("ARMA").

TPI recognises that data protection is the cornerstone of its operations and is committed to processing information about individuals in ways that comply with its obligations under the General Data Protection Regulation (as retained from the EU law version) ("UK GDPR") and the Data Protection Act 2018 ("DPA").

As a membership organisation and the leading professional body for the residential management sector, it is necessary for us to process information relating to individuals, including our individual members. Whenever we process the personal data of individuals, we will ensure that we are clear with those individuals about what we do (or may do) with their information.

This privacy policy explains what personal data (or "information") we hold about individuals and contains important information on who we are, how and why we collect, store, use and share personal information, individuals' rights in relation to their personal information and on how to contact us and supervisory authorities in the event you have a complaint.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy which we may provide on specific occasions when we are collecting or processing personal information about you so that you are fully aware of how and why we are using your personal information. This privacy policy supplements other notices and privacy policies and is not intended to override them.

### Who we are

TPI collects, uses and is responsible for certain personal information about individuals. When we do so we are regulated under the UK GDPR and the Data Protection Act 2018 and we are responsible as the 'controller' of that personal information for the purposes of those laws.

In this privacy policy, references to "we" or "us" mean TPI Limited.

We are a company registered in England and Wales with company number 13753239 and the registered address 20 Eversley Road, Bexhill-on-Sea, East Sussex TN40 1HE.

**T:** 0207 978 2607 / 020 3319 7575  
**E:** [info@tpi.org.uk](mailto:info@tpi.org.uk)  
**W:** [www.tpi.org.uk](http://www.tpi.org.uk)

Association of Residential  
Managing Agents (ARMA)  
3rd Floor, 2-4 St George's Road,  
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SW19 4DP

Institute of Residential Property  
Management (IRPM)  
71 Gloucester Place  
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We operate the websites [www.irpm.org.uk](http://www.irpm.org.uk), [www.irpmlearninghub.org.uk](http://www.irpmlearninghub.org.uk) and [www.arma.org.uk](http://www.arma.org.uk).

We have a compliance officer who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise [Your rights](#), please contact the compliance officer using the details set out below.

### **Contacting our compliance officer**

If you have any questions about this privacy policy or our privacy practices, including a request to exercise any of your rights, please contact our Data Protection Officer in the following ways:

- By post: The Property Inst. Limited
  - 3rd Floor, 2–4 St George's Road, Wimbledon, London SW19 4DP; or
  - Suite 4 & 5, 71 Gloucester Place, W1U 8JW
- By email: [data@tpi.org.uk](mailto:data@tpi.org.uk)

### **DATA PROTECTION PRINCIPLES**

We will comply with the data protection principles set down by the UK GDPR when gathering and using personal information.

### **The personal information we collect and use**

In the performance of our role, we collect and process information relating to individuals.

The information we collect (and how we handle that information) differs depending on who the individual is, and why we are collecting their information.

Our services and website(s) are not intended for children and we do not knowingly collect any personal information relating to children.

### **THE PERSONAL INFORMATION WE COLLECT AND USE RELATING TO OUR MEMBERS**

TPI will collect and use personal information relating to Professional Members, Member Firms, associates, partners and TPI Network Members. Members in this context includes all levels of hierarchy of membership, and those undertaking professional qualification via our training programmes and apprenticeships. It also includes any applicants for membership and/or training and apprenticeships.

Our collection and use of this information is necessary for us to meet our key objectives, which include:

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- Raising standards in the residential property management sector
- Providing individuals with independent accreditation of their professional skills
- Providing a career development path for individuals
- Aiding in the process of recruiting new entrants to the sector
- Assisting practitioners in assessing job applicant capabilities
- Providing opportunities for Continuing Professional Development
- Improving the standing of the sector in the eyes of the public
- Provide our members, associates, partners and TPI Network Members with services and information they expect to receive from their professional body
- Improve and develop our services and performance as the leading professional body in the residential management sector
- Develop and provide products and services, either on our own or in conjunction with third parties (for example the provision of training courses and other initiatives and member benefits)
- Meet our regulatory obligations

## The information we collect

### Professional Members

In relation to Professional Members we may collect the following types of information:

- Name, date of birth, address(es) – work and home, email address(es), telephone number(s), employer (if provided), and other contact details
- If provided: other qualifications, experience, number of units managed, how referred to TPI
- Financial data, including bank account and payment card details and details of your payments to/from the TPI for courses, training, exams, events, and other products/services
- Details of any enquiry you have made, or any report you have submitted to us
- Exam results, CPD activities, notes of important communications between you and us
- Profile data relating to your use of our website(s) including usernames and passwords, your interests, preferences, feedback and survey responses
- Technical data including your internet protocol address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you may use to access the website(s)
- Marketing and communications data including your preferences in receiving marketing from us and our third parties and your communication preferences

In limited circumstances, we may collect limited special category data including details about your race or ethnicity, religion and health. We will only collect this information where you choose to provide it to us, and it will be used only to ensure we are able to make appropriate adjustments for you at events, courses or examinations that you may

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wish to attend and in an anonymised form as part of our use of aggregated data (please see [below](#) for further information).

In addition to receiving information directly from our members, from time to time we also receive information about our members from third parties, for example their employers.

### How we collect it

We use different methods to collect information from and about you, including through:

- Direct interactions: You may give us information by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal information you provide when you:
  - apply for membership
  - apply for or purchase our products or services
  - create an account on our website(s)
  - subscribe to our services or publications
  - request marketing to be sent to you
  - enter a competition, promotion or survey
  - give us feedback or contact us
- Automated technologies or interactions: As you interact with our website(s), we will automatically collect technical data about your device, browsing actions and patterns. We may collect this information by using cookies, server logs and other similar technologies.
- Third parties or publicly available sources: We will receive personal information about you from various third parties and public sources as set out below:
  - technical information from analytics providers such as Google, based outside the UK and outside the EU
  - contact details, financial and transactional data from providers of technical, payment and delivery services such as:
    - DotDigital based outside the UK and outside the EU
    - EventBrite based outside the UK and outside the EU
    - SurveyMonkey based outside the UK and outside the EU
    - Moodle based outside the UK and outside the EU
  - information from your employer or former employer relating to your employment status, qualifications and experience
  - information relating to your identity and contact details from publicly available sources such as Companies House and the Electoral Register based in the UK.

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## Why we collect it

The collection of this information is required from our members so that we can:

- Provide our members with services they expect to receive from us, including newsletters, technical updates, details of our training and events
- Improve and develop our services and performance as an organisation
- Develop and provide products and services, including training and events
- Meet our regulatory obligations.

## Member Firms, Associates, Partners and TPI Network Members

TPI will collect personal information from its Members, Associates, Partners and TPI Network Members. This includes applicants for Members, Associates, Partners and TPI Network Members status.

The information we collect

We may collect the following types of information:

- Name, address, email address, telephone number(s) and other contact details
- Your company's name, your position in the company, the company's address and your company email address and telephone number
- Information required to provide you with a service and details of our services that you have used (for example, attendance on our training courses)
- Details of any enquiry you have made to TPI.

Why we collect it

The collection of this information is required to enable us to perform our role as a professional body, which helps us to:

- Provide our Members, Associates, Partners and TPI Network Members with services and information they expect to receive from their professional body
- Improve and develop our services and performance as the leading professional body in the residential management sector
- Develop and provide products and services, either on our own or in conjunction with third parties (for example the provision of training courses and other initiatives and member benefits)
- Meet our regulatory obligations

We also collect personal information about individuals from their company directly.

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## Who we share it with

From time to time, we may share your personal information with the following categories of recipients:

- Communication platforms and services (including Mailchimp <https://mailchimp.com/legal/privacy/>)
- Survey platforms and services (including Survey Monkey [https://www.surveymonkey.com/mp/gdpr/?ut\\_source=footer](https://www.surveymonkey.com/mp/gdpr/?ut_source=footer))
- IT and software support (including Basecamp <https://basecamp.com/about/policies>)
- Marketing platforms and services
- Financial services, including Accountants
- Member's employer (where the employer is paying the Member's fees and the Member is linked to the employer's account) in connection with the payment of the Member's membership or services fees, or to pass on details of a Member's CPD history, exam results, training attendances or details of a Member's membership status.
- Adjudication Scheme, CEDR, TPI Board, TPI Consultants, TPI Committees and TPI legal helpline.
- Auditors
- Course tutors

Some of those third-party recipients may be based outside the United Kingdom — for further information including on how we safeguard your personal data when this occurs, see 'Transfer of your information out of the UK'.

In relation to Professional Members we will use limited personal information (including your name, employer, the city or location in which you are employed and your job title or seniority) as part of our publicly accessible directory of Members. The directory can be accessed through our website(s).

We will share personal information with law enforcement or other authorities if required by applicable law.

We will not share your personal information with any other third party.

## Where your personal information may be held

Information may be held at our offices, and third-party agencies, service providers, representatives and agents as described above.

We have security measures in place to seek to ensure that there is appropriate security for information we hold.

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## How long your personal information will be kept

We will retain your personal information for no longer than is reasonably necessary for the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements.

For Partners and TPI Network Members we will retain information until membership ceases.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Details of retention periods for different aspects of your personal data are available on request from us by contacting us.

## Our lawful basis

We will only use your personal information when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Our use of your personal data is necessary for us to carry out a contract that we have with you, as our member.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation

Generally, we do not rely on consent as a lawful basis for processing your personal information but there are certain circumstances where we will seek your consent to the processing of your personal information, such as where we carry out direct marketing activities. We have set out below, in a table format, a description of the ways we plan to use your personal information and which lawful bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal information for more than one lawful basis depending on the specific purpose for which we are using your information. Please contact us if you need details about the specific lawful basis, we are relying on to process your personal information where more than one ground has been set out in the table below.

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Purpose/Activity	Lawful basis for processing including basis of legitimate interest
To register you as a new Member	(a) Performance of a contract with you
To perform our role as a professional body	(a) Necessary for our legitimate interests (to perform our role as a professional body including promotion, education, publication etc.)
<p>To manage your membership, including processing and delivering our services to you including:</p> <p>(a) providing you with the services and benefits associated with your membership;</p> <p>(b) managing payments, fees and charges;</p> <p>(c) collecting and recovering money owed to us;</p> <p>(d) maintaining membership records</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to recover debts due to us)</p>
<p>To manage our relationship with you which may include:</p> <p>(a) notifying you about changes to our terms or privacy policy or our terms and conditions;</p> <p>(b) asking you to leave a review, provide information or take a survey;</p> <p>(c) communication with you regarding product and/or service improvements</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how Members use our products/services)</p> <p>(d) Consent (prior to sending any marketing materials to you by email or text message)</p>
To include your details as a Member within our online Member Directory	Necessary for our legitimate interests (to provide a searchable database of Members for use by other Members, other organisations and members of the public in order to promote and support TPI and our Members)
To administer and protect our business and websites (including troubleshooting, data analysis,	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in

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testing, system maintenance, support, reporting and hosting of data)	the context of a business reorganisation or group restructuring exercise)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To maintain records as part of the administration of our business	(a) Necessary for our legitimate interests (to maintain records of business activity in order to respond to questions, complaints and claims and to protect our business and for accounting purposes)  (b) Necessary to comply with a legal obligation (in relation to records kept for tax purposes)

## THE PERSONAL INFORMATION WE COLLECT AND USE RELATING TO ATTENDEES AT OUR EVENTS AND PARTICIPANTS IN EXAMINATIONS OR COURSES

TPI will collect personal information from individuals who attend TPI hosted events, including our annual seminar, conference, awards and regional roadshows.

### The information we collect

We may collect the following types of information:

- Name, address, email address, telephone number(s) and other contact details
- Your company's name, your position in the company, the company's address and your company email address and telephone number
- Information required to provide you with a service and details of our services that you have used (for example, attendance at our event)
- Details of other qualifications, experience, number of units managed, how you were referred to TPI
- Financial data, including bank account and payment card details and details of your payments to/from the TPI for courses, training, exams, events, and other products/services
- Details of any enquiry you have made, or any report you have submitted to us
- Exam or course entries, results, CPD activities, notes of important communications between you and us

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- Profile data relating to your use of parts of our website(s) relating to virtual events, courses and examinations including usernames and passwords, preferences, feedback and survey responses
- Technical data including your internet protocol address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you may use to access the website(s)
- Marketing and communications data including your preferences in receiving marketing from us and our third parties and your communication preferences

In limited circumstances, we may collect limited special category data including details about your race or ethnicity, religion and health. We will only collect this information where you choose to provide it to us, and it will be used only to ensure we are able to make appropriate adjustments for you at events, courses or examinations that you may wish to attend and in an anonymised form as part of our use of aggregated data (please see below for further information).

### How we collect it

We use different methods to collect information from and about you, including through:

- Direct interactions: You may give us information by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal information you provide when you:
  - book attendance at an event, course or examination
  - attend or participate in an event, course or examination
  - apply for or purchase our products or services
  - subscribe to our services or publications
  - request marketing to be sent to you
  - enter a competition, promotion or survey
  - give us feedback or contact us
- From your employer directly
- Automated technologies or interactions: If you interact with our website(s) as part of booking or attending any event, course or examination, we will automatically collect technical data about your device, browsing actions and patterns. We may collect this information by using cookies, server logs and other similar technologies.
- Third parties or publicly available sources: We will receive personal information about you from various third parties and public sources as set out below:
  - technical information from analytics providers such as Google, based outside the UK and outside the EU

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- contact details, financial and transactional data from providers of technical, payment and delivery services such as
  - DotDigital based outside the UK and outside the EU
  - EventBrite based outside the UK and outside the EU
  - SurveyMonkey based outside the UK and outside the EU
  - Moodle based outside the UK and outside the EU
- information from your employer or former employer relating to your employment status, qualifications and experience
- information relating to your identity and contact details from publicly available sources such as Companies House and the Electoral Register based in the UK.

### Why we collect it

The collection of this information is required so that we can host the events, courses and examinations, and it helps us to:

- Provide the events, courses and examinations
- Improve and develop our services and performance
- Develop and provide products and services, either on our own or in conjunction with third parties
- Meet our regulatory obligations

We also collect personal information about individuals from their company directly.

### Who we share it with

From time to time, TPI may share your personal information with the following categories of recipients:

- Website and IT support (including Basecamp <https://basecamp.com/about/policies>)
- Marketing platforms and services (including Mailchimp <https://mailchimp.com/legal/privacy/>)
- Survey platforms and services (including Survey Monkey [https://www.surveymonkey.com/mp/gdpr/?ut\\_source=footer](https://www.surveymonkey.com/mp/gdpr/?ut_source=footer))
- Event sponsors
- TPI Board and Committees
- Third parties responsible for providing services at our events
- Providers of training courses or examinations, including independent examination moderators
- Member's employer (where the employer is paying the Member's fees and the Member is linked to the employer's account) in connection with the payment of the Member's membership or services fees, or to pass on details of a Member's CPD history, exam results, training attendances or details of a Member's Some of

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those third party recipients may be based outside the United Kingdom — for further information including on how we safeguard your personal data when this occurs, see 'Transfer of your information out of the UK.

We will share personal information with law enforcement or other authorities if required by applicable law.

We will not share your personal information with any other third party.

### **Photography and video recordings at our events**

A photographer may be present at TPI events and photographs may be used for future marketing. If you would prefer your image not to be used please notify an TPI member of staff on the day of the event.

### **Where your personal information may be held**

Information may be held at our offices, and third-party agencies, service providers, representatives and agents as described above.

We have security measures in place to seek to ensure that there is appropriate security for information we hold.

### **How long your personal information will be kept**

We will retain your personal information for no longer than is reasonably necessary for the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Details of retention periods for different aspects of your personal data are available on request from us by contacting us.

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## Our lawful basis

We will only use your personal information when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Our use of your personal data is necessary for us to carry out a contract that we have with you, as an attendee or participant in an event, course or examination.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation

It is necessary for us to process the personal information so that we can host those events. Our processing activities are a targeted and proportionate way of achieving this. Attendees reasonably expect that we will process their personal information in this manner.

Generally, we do not rely on consent as a lawful basis for processing your personal information but there are certain circumstances where we will seek your consent to the processing of your personal information, such as where we carry out direct marketing activities.

We have set out below, in a table format, a description of the ways we plan to use your personal information and which lawful bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal information for more than one lawful basis depending on the specific purpose for which we are using your information. Please contact us if you need details about the specific lawful basis we are relying on to process your personal information where more than one ground has been set out in the table below.

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Purpose/Activity	Lawful basis for processing including basis of legitimate interest
To register you an attendee or delegate for an event, course or examination	(a) Performance of a contract with you
<p>To manage your participation in any event, course or examination, including processing and delivering our services to you including:</p> <p>(a) providing the event, course or examination you are attending;</p> <p>(b) managing payments, fees and charges;</p> <p>(c) collecting and recovering money owed to us;</p> <p>(d) maintaining records of attendees and delegates at an event, course or examination;</p> <p>(e) assessing your input, responses or examination answers and providing you with feedback or certification decisions</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to recover debts due to us)</p>
<p>To manage our relationship with you which may include:</p> <p>(a) notifying you about changes to our terms or privacy policy or our terms and conditions;</p> <p>(b) asking you to leave a review, provide information or take a survey;</p> <p>(c) communication with you regarding improvements to events, courses, examinations or other services we may provide</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers, attendees and delegates use our products/services)</p> <p>(d) Consent (prior to sending any marketing materials to you by email or text message)</p>
To administer and protect our business and websites (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)

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<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services (including events, courses and examinations), to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To maintain records as part of the administration of our business</p>	<p>(a) Necessary for our legitimate interests (to maintain records of business activity in order to respond to questions, complaints and claims and to protect our business and for accounting purposes)</p> <p>(b) Necessary to comply with a legal obligation (in relation to records kept for tax purposes)</p>

## THE PERSONAL INFORMATION WE COLECT AND USE RELATING TO RMC/RTM DIRECTORS PORTAL

TPI will collect personal information from RMC/RTM Directors who have signed up to use our Directors portal. This includes applicants for RMC/RTM Directors membership category status.

### The information we collect

We may collect the following types of information:

- Name, address, email address, telephone number(s) and other contact details
- Your company's name, your position in the company, the company's address and your company email address and telephone number
- Information required to provide you with a service and details of our services that you have used (for example, attendance on our training courses)
- Details of any enquiry you have made to TPI

### Why we collect it

The collection of this information is required to enable us to perform our role as a professional body, which helps us to:

- Provide RMC/RTM Directors with services and information they expect to receive as part of this membership category

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- Improve and develop our services and performance as the leading professional body in the residential management sector
- Develop and provide products and services, either on our own or in conjunction with third parties (for example the provision of training courses and other initiatives and member benefits)

We also collect personal information about individuals from their company directly and/or may be provided this information by member organisations where their RMC/RTM Directors have given agreed to be signed up to the Directors portal to enable us to contact them and arrange this.

### Who we share it with

From time to time, TPI may share your personal information with the following categories of recipients:

- Adjudication Scheme, CEDR, TPI Board, TPI Consultants, and TPI Committees.
- Auditors
- Course tutors
- Accountants
- Website and IT support (including Basecamp  
<https://basecamp.com/about/policies>)
- Marketing platforms and services (including Mailchimp  
<https://mailchimp.com/legal/privacy/>)
- Survey platforms and services (including Survey Monkey  
[https://www.surveymonkey.com/mp/gdpr/?ut\\_source=footer](https://www.surveymonkey.com/mp/gdpr/?ut_source=footer))

Some of those third-party recipients may be based outside the European Economic Area — for further information including on how we safeguard your personal data when this occurs, see 'Transfer of your information out of the EEA'.

We will share personal information with law enforcement or other authorities if required by applicable law.

We will not share your personal information with any other third party.

### Where your personal information may be held

Information may be held at our offices, and third-party agencies, service providers, representatives and agents as described above.

We have security measures in place to seek to ensure that there is appropriate security for information we hold.

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## How long your personal information will be kept

We will retain information relating to RMC/RTM Directors until membership ceases.

## Our lawful basis

We rely on legitimate interests as our lawful basis for processing the personal information relating to RMC/RTM Directors membership category.

It is necessary for us to process the personal information we have described so that we can perform our role as a professional body. Our processing activities are a targeted and proportionate way of achieving this. RMC/RTM Directors reasonably expect that we will process their personal information in this manner.

## THE PERSONAL INFORMATION WE COLLECT AND USE RELATING TO THIRD PARTIES

TPI will collect personal information from third parties, including members of the general public who contact us.

### The information we collect

We may collect the following types of information:

- Name, address, email address, telephone number(s) and other contact details
- Your company's name, your position in the company, the company's address and your company email address and telephone number
- Details of any enquiry you have made to the TPI (for example, complaints raised)

### How we collect it

We use different methods to collect information from and about you, including through:

- Direct interactions: You may give us information by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal information you provide when you:
  - apply for a job or contact another company through our jobs pages
  - agree to provide us with any products or services
  - apply for or purchase our products or services
  - create an account on our website(s)
  - subscribe to our services or publications
  - request marketing to be sent to you
  - enter a competition, promotion or survey
  - give us feedback or contact us

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- Automated technologies or interactions: As you interact with our website(s), we will automatically collect technical data about your device, browsing actions and patterns. We may collect this information by using cookies, server logs and other similar technologies.
- Third parties or publicly available sources: We will receive personal information about you from various third parties and public sources as set out below:
  - technical information from analytics providers such as Google, based outside the UK and outside EU
  - contact details, financial and transactional data from providers of technical, payment and delivery services such as
    - DotDigital based outside the UK and outside the EU
    - EventBrite based outside the UK and outside the EU
    - SurveyMonkey based outside the UK and outside the EU
    - Moodle based outside the UK and outside the EU
  - information from your employer or former employer relating to your employment status, qualifications and experience
  - information relating to your identity and contact details from publicly available sources such as Companies House and the Electoral Register based in the UK.

### Why we collect it

The collection of this information helps us to:

- Provide our members, associates, partners and ARM Network Members with services they expect to receive from us
- Improve and develop our services and performance
- Meet our key objectives
- Meet our regulatory obligations

### Who we share it with

From time to time, we may share your personal information with the following categories of recipients:

- Companies who are advertising jobs which you have applied for through our website(s)
- Website and IT support (including Basecamp <https://basecamp.com/about/policies>)
- Marketing platforms and services (including Mailchimp <https://mailchimp.com/legal/privacy/>)
- Survey platforms and services (including Survey Monkey [https://www.surveymonkey.com/mp/gdpr/?ut\\_source=footer](https://www.surveymonkey.com/mp/gdpr/?ut_source=footer))
- Adjudication Scheme, CEDR, TPI Board, TPI Consultants and TPI Committees.
- Auditors

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Some of those third-party recipients may be based outside the European Economic Area — for further information including on how we safeguard your personal data when this occurs, see 'Transfer of your information out of the EEA'.

We will share personal information with law enforcement or other authorities if required by applicable law.

We will not share your personal information with any other third party.

### **Where your personal information may be held**

Information may be held at our offices, and third party agencies, service providers, representatives and agents as described above.

We have security measures in place to seek to ensure that there is appropriate security for information we hold.

### **How long your personal information will be kept**

We will retain your personal information for no longer than is reasonably necessary for the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from

unauthorised use or disclosure of your personal information, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Details of retention periods for different aspects of your personal data are available on request from us by contacting us.

### **Our lawful basis**

We will only use your personal information when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Our use of your personal data is necessary for us to carry out a contract that we have with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation

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It is necessary for us to process the personal information we have described so that we can perform our role as a member organisation. Our processing activities are a targeted and proportionate way of achieving this.

Generally, we do not rely on consent as a lawful basis for processing your personal information but there are certain circumstances where we will seek your consent to the processing of your personal information, such as where we carry out direct marketing activities.

We have set out below, in a table format, a description of the ways we plan to use your personal information and which lawful bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal information for more than one lawful basis depending on the specific purpose for which we are using your information. Please contact us if you need details about the specific lawful basis we are relying on to process your personal information where more than one ground has been set out in the table below.

Purpose/Activity	Lawful basis for processing including basis of legitimate interest
To create an account for you on our website	Performance of a contract with you
To respond to any communication we receive from you	Necessary for our legitimate interests (to engage with you or provide you with information relevant to your communication)
To provide you with goods or services that you may have requested, including: <ul style="list-style-type: none"> <li>(a) providing you with the services and benefits you may have requested;</li> <li>(b) managing payments, fees and charges;</li> <li>(c) collecting and recovering money owed to us;</li> <li>(d) maintaining records of services provided to you</li> </ul>	<ul style="list-style-type: none"> <li>(a) Performance of a contract with you</li> <li>(b) Necessary for our legitimate interests (to recover debts due to us)</li> <li>(c) Necessary to comply with a legal obligation (in relation to records kept for tax purposes)</li> </ul>

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<p>To manage our relationship with you which may include:</p> <p>(a) notifying you about changes to our terms or privacy policy or our terms and conditions;</p> <p>(b) asking you to leave a review, provide information or take a survey;</p> <p>(c) communication with you regarding product and/or service improvements</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how our products/services are used)</p> <p>(d) Consent (prior to sending any marketing materials to you by email or text message)</p>
<p>To transfer a job application you have submitted through our website to the relevant prospective employers</p>	<p>(a) Performance of a contract with you or with a prospective employer you are applying to</p> <p>(b) Necessary for our legitimate interests (to comply with our obligations to a prospective employer you have applied to)</p>
<p>To receive, or to arrange to receive, any goods or services that you have agreed to provide to us, including:</p> <p>(a) Obtaining the benefit of the goods or services;</p> <p>(b) Managing payments, fees and charges;</p> <p>(c) Maintaining records of services provided by you;</p> <p>(d) Comparing the goods or services that you provide with those of other providers</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to manage payments to you, to maintain details of our transactions for analysis and to protect our business and for accounting purposes, to determine whether to obtain further goods or services and whether to do so from you)</p> <p>(c) Necessary to comply with a legal obligation (in relation to records kept for tax purposes)</p>
<p>To facilitate and administer any competition, promotion or prize draw, including:</p> <p>(a) to record your entry into any competition, promotion or prize draw;</p> <p>(b) to provide you with the benefit or result of any competition, promotion or prize draw;</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (managing a competition, promotion or prize draw, undertaking advertising or marketing of the result of a competition, promotion or prize draw as part of our marketing strategy)</p> <p>(c) Necessary to comply with a legal obligation (in relation to records kept for tax purposes or to demonstrate that the competition, promotion or prize draw has</p>

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<p>(c) to monitor entries or use of any competition, promotion or prize draw, including to intervene in circumstances of misuse;</p> <p>(d) to undertake marketing or advertising in relation to the results of any competition, promotion or prize draw;</p> <p>(e) to maintain records in relation to a competition, promotion or prize draw</p>	<p>been carried out in accordance with the relevant legal requirements)</p>
<p>To administer and protect our business and websites (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To maintain records as part of the administration of our business</p>	<p>(a) Necessary for our legitimate interests (to maintain records of business activity in order to respond to questions, complaints and claims and to protect our business and for accounting purposes)</p> <p>(b) Necessary to comply with a legal obligation (in relation to records kept for tax purposes)</p>

## FURTHER INFORMATION ABOUT HOW WE MAY USE YOUR PERSONAL INFORMATION

### Direct marketing

We strive to provide you with choices regarding certain uses of your personal information, particularly around marketing and advertising.

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We may use your information to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You will receive marketing communications from us if:

- you have requested information from us or purchased products or services from us and you have not opted out of receiving that marketing; or
- you have expressly consented to receiving marketing from us.

We will obtain your express opt-in consent before we share your personal data with any third party for marketing purposes.

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at [data@tpi.org.uk](mailto:data@tpi.org.uk) at any time.

Where you opt out of receiving marketing messages, this will not apply to information provided to us as a result of a purchase of products or services, membership or other transactions.

### **If you fail to provide information**

Where we need to collect information by law, or under the terms of a contract we have with you, and you fail to provide that information when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### **Aggregated information**

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal information but is not considered personal information in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your personal information to calculate the percentage of users accessing a specific website feature. However, if we combine or connect personal information so that it can directly or indirectly identify you, we treat the combined information as personal data which will be used in accordance with this privacy policy.

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## Links to third party websites

Our website(s) may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for any privacy statements on such. When you leave our website(s), we encourage you to read the privacy policy of every website you visit.

## Transfer of your information out of the UK

We may transfer your personal information to locations outside the UK including countries within the European Economic Area and other countries outside the European Economic Area, including the United States of America.

TPI is satisfied that any transfer of your personal data to platforms outside of the UK has adequate levels of data protection for your personal data, through one of the following safeguards:

- we will only transfer personal information to countries that have been deemed to provide an adequate level of protection for personal data by the Information Commissioner's Office including those countries in the European Union
- where we use certain service providers, we may use specific contracts approved by the Information Commissioner's Office which give personal data the same protection it has in the UK.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

## Your rights

Under the UK GDPR and DPA you have a number of important rights free of charge.

In summary, those include rights to:

- fair processing of information and transparency over how we use your personal information
- access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address
- require us to correct any mistakes in your information which we hold. Our members are encouraged and invited to log into their online account and amend their contact information and update it where necessary.
- require the erasure of personal information concerning you in certain situations
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations

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- object at any time to processing of personal information concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal information
- otherwise restrict our processing of your personal information in certain circumstances
- claim compensation for damages caused by our breach of any data protection laws

For further information on each of those rights, including the circumstances in which they apply, see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals rights under the General Data Protection Regulation](#).

If you have any questions about this privacy policy, including a request to exercise any of your rights, please:

- Email us at [data@tpi.org.uk](mailto:data@tpi.org.uk)
- let us know the information to which your request relates, including any membership number or reference number, if you have them

We try to respond to all legitimate requests within one month. Occasionally, it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

We hope that we can resolve any query or concern you raise about our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

### **Keeping your personal information secure**

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

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## Changes to this privacy notice

This privacy notice was last updated on 10 March 2022.

We may change this privacy notice from time to time, and when we do, we will inform you.

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