



## EFAT PRIVACY POLICY

Our privacy policy and guiding principles set out the ways we will manage your data - respectfully and responsibly and in line with our legal obligations.

### Our principles

1. We put the safeguarding of your data at the centre of everything we do
2. All personal data is managed respectfully and responsibly
3. When we communicate with you, we aim to always send information that is relevant and appropriate
4. We are proactive about managing your privacy, making sure the way we look after your personal data is secure and legally compliant

### Our policy

#### What this policy covers

The European Federation of Art Therapy (EFAT) is committed to protecting your personal information, whether you are a member, member of the public, partner, friend, patron or associate. It is our aim to put our members and supporters and the safeguarding of their personal data at the centre of everything we do and manage your personal data respectfully and responsibly.

This Policy explains how the EFAT collects, manages and uses the personal information you provide to us, whether online, via phone or in person, email, in writing or any other correspondence.

We ensure that we use your personal data in accordance with all applicable laws concerning data protection and personal information.

#### **This Policy explains:**

- Who we are;
- What personal data we collect;
- How we may use your data;
- How we may contact you;
- How we will store and protect your data;
- The circumstances in which we share your data with third parties;
- What you should do if you would like us to change or delete the data we hold for you or stop contacting you;
- How to make a complaint;
- Changes to this Privacy Policy.



EUROPEAN  
FEDERATION OF  
ART THERAPY

## Who we are

The EFAT is an international organisation registered as an IVWZ - Internationale Vereniging Zonder Winstoogmerk (International Non-Profit Organisation) in Belgium. EFAT exists to unite, support and promote art therapists and professional art therapy associations in Europe.

To fulfil this mission:

- We work actively to promote further development of professional practice, training and research, and the recognition of the profession;
- We aim to nurture mutual respect of diversity and to foster collaboration and contributions between member countries;
- We seek to assure and promote the quality of Art Therapy practice and training for the benefit of clients, professionals and institutions;
- The activities of the federation are ultimately for public benefit

The data received from you helps us to deliver our social objectives through events, services and products by allowing us to understand how you interact with and use what we offer. Sharing your data also enables us to provide you with more tailored and relevant information to help you get the most from your experience of receiving services from EFAT.

## What personal data we collect

We may collect personal information about you when you engage with us for a number of reasons including when you enquire about our activities and services, engage with our social media, make a donation, sign up to receive emails, become a member, create an online account, purchase something from us, register for an event, consultation, or otherwise provide us with personal information that may be used by the EFAT to deliver its services to you or to enhance your experience with us.

This can include information such as your name, postal address, email address, phone number, age, bank details and credit/debit card details.

In addition to your personal data, we may also ask for your preferences so that we can send you information that is tailored to your interests.

On occasion, we may receive information about you from third parties, for example if we have run a joint event with a third party or we have received a personal recommendation that you may be interested in the work of the EFAT.



We do not usually collect ‘sensitive personal data’ from you unless there is a clear reason for doing so, such as where we need this information to ensure that we provide appropriate facilities or support. An example of sensitive personal data we may hold would be in relation to events where we would like it to be accessible for people with disabilities.

#### **Potential new supporters and donors**

We may collect information on potential supporters or donors who might be interested in becoming involved or increasing their involvement with the EFAT but will only do this where we have a legitimate interest and have carried out a legitimate interest assessment or and/or a privacy impact assessment as required (see below).

#### **Website users**

The software used for the EFAT website uses cookies to help our website work well and to track information about how people are using it.

We may gather information about you from your use of our website, such as which pages are most visited and which events or facilities are of most interest. We will use this information to improve our website and to ensure we provide the best services for our users. Wherever possible we use aggregated or anonymous information which does not identify individual visitors to our website. By submitting your details, you enable us (and where applicable any suppliers we use) to provide you with the goods, services, information, activities or online content you select and any other related services the EFAT may provide.

If you register on our website then the following will also apply:

- The website will collect personal information when you register with us;
- The website will collect such information as your name, email address and country. Once you register with the website you will not be anonymous to us when you subsequently sign in;
- You endeavour to ensure that any registration information you give to the EFAT will always be accurate, correct and up to date;
- We collect and retain information about your transactions with us so that we can process your transactions and deal with future queries;
- Through the use of cookies, we will receive information from your computer such as your IP address (the unique number that identifies your computer when you use the internet) and we may record this information to provide you with a good experience when browsing our website or to improve the functionality of our site.



## **Members and Staff Applications**

If you apply to be a member, a paid member of staff or are a nominee for being a board member for EFAT, we will only use the information you give us to process your application. If we want to disclose information to someone outside the EFAT, for example, if we need a reference, we will make sure we tell you beforehand, unless we are required to disclose this information by law.

If you are unsuccessful in your job application, we may hold your personal information for up to 12 months after we've finished recruiting for the position you applied for. After this date we will destroy or delete your information (unless you are a member of EFAT). We keep de-personalised statistical information about applicants to develop our recruitment processes, however no individual applicant would be identifiable from this information.

If you commence with employment or becoming a member with the EFAT, your data will be processed in accordance with your contract and our other applicable policies.

### **Your debit card and credit card information**

If you use your credit or debit card to donate to us, buy something or pay for a ticket or membership online, we will ensure that this is done securely and that we will not keep your details for longer than necessary for the purposes of the transaction.

## **How we may use your data**

We may use your personal data for a number of purposes, including the following:

- To provide you with the services, products or information you have requested from us. This could include fulfilling sales contracts you have entered into with us, or servicing your membership with us. It may also include providing you with information in your membership communications about events, offers and art therapy related news outside the EFAT, which we think may be of interest to you.
- To provide you with information by email which we feel may interest you and where you have given your consent to be contacted by email. This may include requests for your support (please refer to How We May Contact You).
- To provide you with information about our work or our activities by post where we have a legitimate interest in sending it to you. Again this may include requests for your support.
- To telephone you if you have provided us with your telephone number.
- To process a donation we may receive from you and to communicate with you in regard to the donation.



- To create an account for you if you register with us.
- For member and customer service or administrative purposes (for example we may contact you regarding a donation you have made or an event you have registered or booked a ticket for).
- For internal record keeping, including the management of any feedback or complaints.
- To target communications and messages to you and to identify similar groups of prospective members and customers.
- To assess our member and customer base, including how they interact with us, attend our events, and what parts of the EFAT you are interested in.
- To compile briefing notes for our members about guests in advance of meetings, dinners and other events.
- To track user visits to our website and record navigation across our website and in addition to track whether our emails are opened and read.
- To invite you to participate in surveys or research.
- To use IP addresses to identify your approximate location, to block disruptive use, to record website traffic or to personalise the way our information is presented to you.
- To analyse and improve the services we offer.
- Where it is authorised by law.
- We may assess your personal information for the purposes of credit risk reduction or fraud prevention.

### **Inappropriate website content**

If you post or send any content that we believe to be inappropriate, offensive or in breach of any laws, such as defamatory content, we may use your personal information to inform relevant third parties such as your internet provider or law enforcement agencies.

## **How we may contact you**

### **By email**

If possible, we would like to be able to contact you by email because we feel it is the most efficient and productive way to communicate with you about the wide range of programmes and offers from across the EFAT.

We will contact you by email if you have given us your email address and we are emailing you to provide the services you have requested.

We may also contact you by email if you have bought a service or goods from us and we want to contact you about similar goods or services.

We may in addition contact you for information and promotion purposes by email if you have given us your consent to do so. This may include requests for



your support through a variety of different initiatives such as requesting donations, inviting you to attend special events, or encouraging you to purchase tickets or products.

**By text**

We may send you service communications via text, for example where you placed an order for goods or services on our website, or you have given a donation by text.

**By post and telephone - where we have a legitimate interest to contact you**

If you have provided us with your postal address or telephone number we may send you direct mail or telephone you about our work and our fundraising campaigns, unless you have told us that you would prefer not to receive such information. We will carry out a legitimate interest assessment to ensure that we are satisfied that you would reasonably expect such communications from us and would not consider it to be intrusive. For example, we may want to post you an invitation to an event we think you may be interested in.

We consider that we have a legitimate interest in furthering the charitable aims of the EFAT by engaging the public in the events and experiences we offer so that we can promote and educate in art therapy. In order to do so, we need to be able to tell people about our work and to raise funds by donations and sponsorships or through our commercial activities, for example, conferences.

If you have not given us your data yourself and we have not received it from a third party, we will only contact you if you fall into one or more of the categories below:

- You are a known philanthropist or connected with a partner or associate, and/or
- You are a known art therapist, or involved in art therapy or art therapy education, and/or
- You are a well-known art therapist.

**If we have a legal obligation to process your data**

In addition to the above, we may have a legal obligation to process your data, for example in order to carry out due diligence if you are a prospective donor or sponsor.

**Business to business communications**

If we are communicating to you on a 'business to business' basis we will contact you by post or email, unless you have let us know that you would prefer us not to do so.



## How we will store and protect your data

We will either store your data on our own servers or in the Cloud. Where we transfer your data, we will ensure that: the country where the data is transferred to is within the European Economic Area (EEA); or the country has been deemed to provide an adequate level of protection for personal data by the European Commission; or we use specific contracts approved by the European Commission which give personal data the same protection it has in Europe; or the organisation receiving the data is part of the U.S. Privacy Shield arrangement; or a specific legal exception applies. We will take all reasonable steps to ensure that your data is kept secure, including encryption, network level protection, strong password policies and dual authentication.

### Keeping your personal data

We keep your personal data for as long as required to operate the service we are providing to you or for archival purposes and in accordance with legal requirements and tax and accounting rules. If we have not heard from you or you have not engaged with us for a period of two years and we do not need to keep your personal data for archival, legal or business reasons, we will delete or suppress your personal information. Where your information is no longer required, we will ensure it is disposed of in a secure manner.

If you have told us that you do not want to hear from us at all or by a particular channel, we will hold the minimum amount of your personal data on a suppression list to ensure we comply with your request.

## The circumstances in which we share your data with third parties

The EFAT may share your data with the other EFAT entities, suppliers or service providers to provide the products or services you've requested from us, for example, we may use a separate company to deliver tickets or for voting purposes. Other instances where we may share your data would be for payment processing, mailing houses, database services or website hosting.

If you have chosen to take part in an event or an activity the EFAT is running jointly with a third-party organisation, you will be asked if your data can be shared with these third parties.

We may also share data with such online engines as Google, Facebook and other third parties, to help us to identify customers who are similar to our audiences, target the adverts that we serve, and ensure they are relevant to



new and existing members and customers. However, we will only do so if we are satisfied that your personal data is secure and will not be used for any other, especially commercial, purpose. The personal data shared for these purposes is pseudonymised to protect it.

We may disclose your personal information to a third party if we are under a duty to disclose your personal data in order to comply with any legal obligation (for example to government bodies and law enforcement agencies), or in order to enforce or apply our rights (including in relation to our website or other applicable terms and conditions) or to protect the EFAT, for example in cases of suspected fraud or defamation.

### **Links**

This Policy applies to all data we collect from across the EFAT, including our website. If a link on this website takes you to the website of a third party you should refer to the privacy policy relating to that website to understand how your personal information is managed by that third party or how they use cookies. We cannot accept any responsibility or liability for the privacy practices of such third-party websites and your use of such websites is at your own risk.

## **What you should do if you would like us to change or delete the data we hold for you, or stop contacting you**

### **Do you want us to stop contacting you?**

It is your choice as to whether and how you want to receive information about us and our work, and the ways you can get involved. You have the right at any time to ask us to amend or stop using your personal information, including for newsletter, mailing and promotion purposes.

You may opt out of newsletter and promotion emails at any time by emailing to the sender using the heading 'unsubscribe'. You can also change any of your information preferences at any time (including telling us that you don't want us to contact you for information purposes by telephone or send you direct information by post) by contacting [info@arttherapyfederation.eu](mailto:info@arttherapyfederation.eu). We will not use your information for promotion purposes if you have indicated that you do not wish to be contacted for such purposes. However, we will retain your details on a suppression list to help to ensure that we do not continue to contact you.

### **Do you want to change the details we hold for you?**

The accuracy of your information is important to us. You can edit your EFAT



account information, including your address and contact details at any time. If you would like to change your preferences or update the details we hold about you, please contact [info@arttherapyfederation.eu](mailto:info@arttherapyfederation.eu)

**Do you want to request a copy of the information we hold for you?** You have a right to request a copy of the personal information we hold about you and to have any inaccuracies corrected or your data erased. You also have a right to data portability.

If you would like to make a request for this data (a Subject Access Request) we require you to prove your identity with two pieces of approved identification for these purposes. Please address requests to The President of EFAT, The European Federation of Art Therapy, [info@arttherapyfederation.eu](mailto:info@arttherapyfederation.eu).

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. Please provide as much information as possible about the nature of your contact with us to help us locate your records. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

## How to make a complaint

If you would like to make a complaint about any aspect of this Policy, please contact The President of EFAT, email [info@arttherapyfederation.eu](mailto:info@arttherapyfederation.eu).

### **The European Data Protection Board**

You have the right to lodge a complaint with the supervisory authority responsible for all information matters. According to your country this can be advised by the [European Data Protection Board](https://www.edpb.europa.eu/) at [edpb@edpb.europa.eu](mailto:edpb@edpb.europa.eu).

## Changes to this Privacy Policy

We may update the terms of this Policy at any time, so please do check it from time to time. We will notify you about significant changes in the way we treat personal information by sending a notice to the primary email address you have provided to us or by placing a prominent notice on our website. By continuing to engage with us through our services and our website you will be deemed to have accepted such changes.