



TREASURY
EXCELLENCE
AS STANDARD

**THE ASSOCIATION OF CORPORATE
TREASURERS /
ACT (ADMINISTRATION) LIMITED /
THE ACT EDUCATIONAL TRUST
PRIVACY POLICY**

We take your privacy very seriously and we are committed to protecting it. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal information. It also explains your rights in relation to your personal information and how to contact us (or the supervisory authority) if you have a complaint.

We collect and use certain personal information about you. When we do so we are subject to the UK General Data Protection Regulation (UK GDPR), and for the purposes of which we are responsible as ‘controller’ of that personal information.

Key terms

It would be helpful to start by explaining some key terms used in this policy:

ACT, we, us, our	The Association of Corporate Treasurers, a body incorporated in England and Wales by Royal Charter, under Companies House registration number RC000859; ACT (Administration) Limited, the wholly owned subsidiary of The Association of Corporate Treasurers, incorporated in England and Wales, under Companies House registration number 01713927; and The ACT Educational Trust, a charity registered at the Charity Commission under number 288859. All three entities are registered at 10 Lower Thames Street, London EC3R 6AF.
Our representative	Holly McKenzie Adams Head of Governance dataprotection@treasurers.org
Personal information	Any information relating to an identified or identifiable individual
Special category personal information	Personal information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership Genetic and biometric data Data concerning health, sex life or sexual orientation Information concerning any offences (including alleged offences), criminal proceedings, outcomes and sentences.

Personal information we collect about you

We may collect and use the following personal information about you:

- your name and contact information, including email address, telephone number and company details
- information to enable us to check and verify your identity, e.g. your date of birth
- your gender information, if you choose to give this to us
- location data, if you choose to give this to us
- your billing information, transaction and payment card information
- your personal or professional interests, if you choose to give this to us
- your professional online presence, e.g. LinkedIn profile
- your contact history, purchase history and saved items
- information you make publicly available on our social media accounts e.g. 'likes', posts and responses to our LinkedIn groups, Facebook pages and YouTube videos
- information to enable us to undertake credit or other financial checks on you
- Information about how you use our website, IT, communication and other systems
- your responses to surveys, competitions and promotions
- your education, training and professional development details
- your attendance at ACT events

This personal information is required to provide products and services to you. If you do not provide such personal information, it may delay or prevent us from providing products and services to you.

How your personal information is collected

We collect most of this personal information directly from you – in person, by telephone, text or email and/or via our website and apps. However, we may also collect information:

- from publicly accessible sources, e.g. Companies House or social media (e.g. LinkedIn, Facebook)
- directly from a third party, e.g.:

- sanctions screening providers
- credit reference agencies
- customer due diligence providers
- education or training providers
- managed service providers
- ACT volunteers
- your employer
- from a third party with your consent
- from cookies on our website—for more information on our use of cookies, please see our [cookies policy](#)
- via our IT systems, e.g.:
 - door entry systems and reception logs;
 - automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, assessment applications, remote proctoring applications, webinar applications, email and instant messaging systems
- in photographs containing an identifiable image of you taken at an ACT event.

How and why we use your personal information

Under data protection law, we can only use your personal information if we have a proper reason for doing so, e.g.:

- where you have given consent
- to comply with our legal and regulatory obligations
- for the performance of our contract with you or to take steps at your request before entering into a contract, or
- for our legitimate interests or those of a third party

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (i.e. ‘process’) your personal information for and our reasons for doing so:

What we use your personal information for	Our reasons
Membership administration purposes	For the performance of our contract with you or to take steps at your request before entering into a contract
To provide products and services (e.g. learning and assessment products and services) to you	For the performance of our contract with you or to take steps at your request before entering into a contract
To provide your information (name, job title, department (if known), membership category, work location, qualification(s) completed or undertaking) to your employer	For our legitimate interests (i.e. in supporting the development of the treasury profession) or those of third parties (i.e. of your employer in verifying your professional information) To comply with our legal and regulatory obligations i.e. to keep your information updated
To verify your membership and/or qualification(s) to prospective employers and agencies	For the legitimate interests of those third parties i.e. in verifying your information, and for the legitimate interests of ACT as the representative of the treasury profession
To prevent and detect fraud against you or ACT	For our legitimate interests or those of a third party, i.e. to minimise fraud that could be damaging for us and for you
Conducting checks to identify our customers and verify their identity Screening for financial and other sanctions or embargoes (e.g. ACT Council members) Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business, e.g. under health and safety regulation	To comply with our legal and regulatory obligations
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations

What we use your personal information for	Our reasons
Ensuring business policies are adhered to, e.g. policies covering security and internet use	For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price
Ensuring the confidentiality of commercially sensitive information	For our legitimate interests or those of a third party, i.e. to protect trade secrets and other commercially valuable information To comply with our legal and regulatory obligations
Statistical analysis to help us manage our business, e.g. in relation to our financial performance, customer base, product range or other efficiency measures	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price
Preventing unauthorized access and modifications to systems	For our legitimate interests or those of a third party, i.e. to prevent and detect criminal activity that could be damaging for us and for you To comply with our legal and regulatory obligations
Updating and enhancing customer records	For the performance of our contract with you or to take steps at your request before entering into a contract To comply with our legal and regulatory obligations For our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our customers about existing orders and new products
Statutory returns	To comply with our legal and regulatory obligations

What we use your personal information for	Our reasons
Ensuring safe working practices, staff administration and assessments	To comply with our legal and regulatory obligations For our legitimate interests or those of a third party, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you
Marketing our services and those of selected third parties to: • existing and former customers; • third parties who have previously expressed an interest in our services; • third parties with whom we have had no previous dealings.	For our legitimate interests or those of a third party, i.e. to promote our business to existing and former customers
Credit reference checks via external credit reference agencies	For our legitimate interests or those of a third party, i.e. to ensure our customers are likely to be able to pay for our products and services
External audits and quality checks, e.g. for ISO or Investors in People accreditation and the audit of our accounts	For our legitimate interests or a those of a third party, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards To comply with our legal and regulatory obligations

What we use your personal information for	Our reasons
Disciplinary investigations	For our legitimate interests or those of a third party, i.e. to maintain the standards of the treasury profession so we can demonstrate it operates at the highest standards To comply with our legal and regulatory obligations, in carrying out investigations and judicial processes in accordance with natural justice

The above table does not apply to special category¹ personal information, which we will only process with your explicit consent.

Promotional communications

We may use your personal information to send you updates (by email, text message, telephone or post, in accordance with your preferences) about our products and services, including exclusive offers, promotions or new products and services.

We make it easy for you to tell us how you want to hear from us by logging on to our website, visiting the Member area of the site and updating your contact preferences. We suggest you do that regularly, so that we have your most up-to-date contact preferences and can continue to communicate with you in the ways you would like.

We do not need your consent to send you promotional communications if you have contacted us in the past about our products and services and not unsubscribed, but where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal information with the utmost respect and never sell or share it with other organisations outside the ACT for marketing purposes.

We send out emails about the following areas:

- ACT events and webinars
- ACT qualifications and learning
- ACT membership and CPD

¹ <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/lawful-basis/a-guide-to-lawful-basis/special-category-data/#scd1>

- ACT Policy & Technical treasury resources
- ACT newsletters

You have the right to opt out of receiving promotional communications at any time by:

- contacting us at customer@treasurers.org
- using the 'unsubscribe' link in emails or a 'STOP' reply in texts
- updating your marketing preferences on your ACT student or membership account.

We may ask you to confirm or update your marketing preferences if you instruct us to provide further products and services in the future, or if there are changes in the law, regulation, or the structure of our business.

There are certain types of event-specific emails that you will always receive from us, regardless of your contact permissions. These include confirmation of booking, pre-visit information, post-visit information to gather feedback or notification if we need to change or cancel an event. These 'service' communications are sent to assist you with your booking and your visit, and are sent irrespective of any contact preferences you have supplied to us.

Disclosures of your personal information

We routinely share personal information with:

- companies within the ACT group;
- third parties we use to help deliver our products and services to you, e.g.:
 - payment service providers
 - warehouses and delivery companies
 - education, training establishments and examining bodies
 - business associates and other professional advisers
 - employees, temps, volunteers and agents of ACT
 - data processors (i.e. those requiring your information in order to provide a service to ACT)
 - services related to third-party data collection activities (e.g. Google Ads or similar)
 - healthcare, social and welfare advisers or practitioners
 - financial organisations and advisers

- credit reference agencies
- trade, employer associations and professional bodies
- voluntary and charitable organisations
- Ombudsmen and regulatory authorities
- other third parties we use to help us run our business, e.g. marketing agencies, website hosts or website component providers
- third parties approved by you, e.g. social media sites
- your employer(s)
- our banks
- social media websites where, for marketing purposes, we post photographs of ACT events, which photographs may contain an identifiable image of you.

We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers to ensure they may only use your personal information to provide services to us and to you. We may also share personal information with external auditors.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

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

Where your personal information is held

Information may be held at our offices and on our secure systems and those of our third party agencies, service providers, representatives and agents as described above (see above: [Disclosures of your personal information](#)).

Some of these third parties may be based outside the European Economic Area. For more information, including on how we safeguard your personal information when this occurs, see below: [Transferring your personal information out of the EEA](#).

How long your personal information will be kept

We will keep your personal information while you have an account with us or we are providing products and services to you. Thereafter, we will keep your personal information for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly;
- to keep records required by law.

We will not retain your personal information for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of personal information.

When it is no longer necessary to retain your personal information, we will delete or anonymise it.

Transferring your personal information out of the EEA

To deliver services to you it is sometimes necessary for us to share your personal information outside the European Economic Area (EEA), e.g.:

- with our offices, networks and volunteers outside the EEA;
- with your and our service providers located outside the EEA;
- if you are based outside the EEA;
- where there is an international dimension to the services we are providing to you. These transfers are subject to special rules under European and UK data protection laws.

The following countries to which we may transfer personal information have been assessed by the European Commission as providing an adequate level of protection for personal information:

At the time of this policy's latest review, the list is: Andorra, Argentina, Brazil, Canada (commercial organisations), Faroe Islands, Guernsey, Israel, Isle of Man, Japan, Jersey, New Zealand, Republic of Korea, Switzerland, Uruguay and the United States of America (limited to commercial organisations participating in the EU-US Data Privacy Framework), and the European Patent Organisation².

² The current list, which may be updated by the European Commission from time to time, may be found at https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en

Except for the countries listed above, non-EEA countries do not have the same data protection laws as the United Kingdom and EEA. We will, however, ensure the transfer complies with data protection law and all personal information will be secure. Our standard practice is to use standard data protection contract clauses that have been approved by the European Commission. You can see a copy of those clauses at: <https://eur-lex.europa.eu/eli/dec/2010/87>.

If you would like further information please contact the Head of Governance (see '[How to contact us](#)' below).

Your rights

You have the following rights, which you can usually exercise free of charge:

Access	The right to be provided with a copy of your personal information (the right of access)
Rectification	The right to require us to correct any mistakes in your personal information
Erasure (also known as the right to be forgotten)	The right to require us to delete your personal information in certain situations
Restriction of processing	The right to require us to restrict processing of your personal information in certain circumstances, e.g. if you contest the accuracy of the information
Data portability	The right to receive the personal information you provided to us in a structured, commonly-used and machine-readable format and/or transmit that information to a third party in certain situations
To object	The right to object: • at any time to your personal information being processed for direct marketing (including profiling); • in certain other situations to our continued processing of your personal information, e.g. processing carried out for the purpose of our legitimate interests.
Rights in respect of automated decision-making	Where significant decisions (those that produce a legal or similarly significant effect on you) are made using your personal data and based on solely automated processing with no meaningful human involvement, you have the right to have certain safeguards in place to protect your data

	subject rights, freedoms and legitimate interests. These safeguards include giving you information about the decision and enabling you to make representations, obtain human intervention, and contest the decision In addition, significant decisions made using special category personal data and based on solely automated processing are only permissible in certain specified scenarios (e.g. where you have given your explicit consent for the decision to be made using such data).
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For further information on each of those rights, including the circumstances in which they apply, please contact the ACT Head of Governance or see [A Guide to Individual Rights](#) from the Information Commissioner's Office.

If you would like to exercise any of those rights, please:

- email, call or write to the Head of Governance (see '[How to contact us](#)'); and
 - let us have enough information to identify you (e.g. your full name, address and customer or matter reference number);
 - let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
 - let us know what right you want to exercise and the information to which your request relates.

Keeping your personal information secure

We have appropriate security measures to prevent personal information from being accidentally lost, or used or accessed unlawfully. We limit access to your personal information to those who have a genuine business need to access 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 the UK regulator (the Information Commissioner's Office (ICO)), of a suspected data security breach where we are legally required to do so.

Assessment of student submissions

We reserve the right to use TurnItIn or similar software to assess student submissions

and identify potential disqualification factors including but not limited to plagiarism and/or use of AI. The outcome of any such assessment will form part of overall consideration of a student's grade.

Online invigilation services

The invigilation of ACT online exams is provided by our supplier Surpass Assessment of Salts Wharf, Ashley Lane, Shipley, West Yorkshire, BD17 7DB, United Kingdom (**Surpass**) through the online invigilation platform that Surpass provides (powered by ProctorExam).

If you take an ACT online exam then you agree that you are being monitored over the internet through your computer via your webcam and microphone, and through your mobile phone via your camera, during your exam session. Online invigilation means that you will log on to a test platform through the internet to take your exam and you will be monitored, sometimes in real time, during your entire exam session so that your face, voice, desk and workspace will be captured and a recording will be made of these for the purposes of exam security and the integrity of the exam process. It is your responsibility to ensure that only you will be recorded during an online invigilation testing session and that no one else will be physically in the room where you are testing and that no one speaks to you during your testing sessions.

When you take an ACT online exam Surpass may also collect and record further information about you, such as your name, email address, captured facial photo, captured government issued photo ID, physical (visible) health data/condition (by virtue of video recording), racial/ethnic origin/religious beliefs (by virtue of video recording), IP address, browser agents, browser and operating system identifiers, screenshots of your PC, your exam setting (home, office etc), all recorded video streams (computer, webcam and mobile), name of the exam you are sitting and other exam-based data that may be collected, including information about browser version, appVersion, appName, product and appName, video frame size, type and library used for encoding, framerate, jitter, packet loss and bandwidth.

The video and audio recordings are standard test procedures for all awarding organisations' online invigilated exams and your video and audio recordings will be used by Surpass for purposes of identity verification, online observation, incident resolution such as fraud prevention, exam security and for the integrity of the exam and exam process.

You understand and agree that the audio- and video-tapes and photos of your online exam sessions will be supplied in certain circumstances to, and used by, us as the

awarding body to assist with the administration of your exam, including to investigate whether there is evidence of a breach of the ACT Assessment Rules and Regulations, and if necessary to investigate whether there is evidence of a breach of the ACT Ethical Code.

Surpass will retain your personal information no longer than is necessary for the purposes for which it is processed. This will also depend on the retention periods set out by us, as the awarding body, and applicable laws.

When you take an ACT online exam, Surpass will use the selected third party service ProctorExam, hosted in Germany (Frankfurt Region), to process your personal information on our behalf. You agree that some or all of the above personal information may be processed outside the UK and EEA. In such circumstances, and if you are based in the UK or EU, we will, as required by data protection legislation (including UK-GDPR), ensure that your privacy rights are protected by appropriate safeguards.

By taking an ACT online exam you also agree to allow your personal information to be transferred by Surpass to us as the awarding body. We require your personal information so that exams can be correctly administered and certification can be properly issued.

Data protection by design and default

We ensure we comply with the legal requirements for data protection by design and default by doing the following:

- we consider data protection issues as part of the design and implementation of our systems, services, products and business practices
- we make data protection an essential component of the core functionality of our processing systems and services
- we (i) process only the personal data we need in relation to our purposes and (ii) use the data for those purposes only
- personal data are automatically protected in any IT system, service, product and/or business practice, so individuals should not have to take any specific action to protect their privacy
- the identity and contact information of people responsible for data protection are available within our organisation and to data subjects
- we adopt a plain language policy for any public documents, so individuals easily

understand what we are doing with their personal data

- we provide individuals with tools so they can determine how we are using their personal data, and whether we are properly enforcing our policies, and
- we offer strong privacy defaults, user-friendly options and controls, and respect user preferences.

How to complain

If you would like to raise any complaint related to our use of your personal information, please complete our [Data Protection Complaints Form](#).

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

However, if we haven't been able to do so, you also have the right to lodge a complaint with the ICO, who may be contacted at <https://ico.org.uk/make-a-complaint/data-protection-complaints/>, telephone: 0303 123 1113, or via the live chat service on <https://ico.org.uk/global/contact-us/contact-us-public/public-advice/>.

Changes to this privacy policy

This privacy notice was published on 6 April 2019 and last updated on 8 May 2026.

How to contact us

Please contact the Head of Governance by post, email or telephone if you have any questions about this privacy policy or the information we hold about you.

Head of Governance

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E: dataprotection@treasurers.org

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