



TREASURY
EXCELLENCE
AS STANDARD

**THE ASSOCIATION OF CORPORATE
TREASURERS/
ACT (ADMINISTRATION) LIMITED
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 supervisory authorities if you have a complaint.

We collect and use certain personal information about you. When we do so we are subject to the General Data Protection Regulation, which applies across the European Union (including in the United Kingdom) and the Data Protection ACT 2018, which applies in the United Kingdom only, and we are responsible as ‘controller’ of that personal information for the purposes of those laws.

Key terms

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

ACT, we, us, our	<p>The Association of Corporate Treasurers, a body incorporated in England and Wales by Royal Charter, under registration number RC000859;</p> <p>ACT (Administration) Limited, the wholly owned subsidiary of The Association of Corporate Treasurers, incorporated in England and Wales, under registration number 01713927;</p> <p>and</p> <p>The ACT Educational Trust, a charity registered under number 288859.</p> <p>All three entities are registered at 3rd Floor, 150 Minories, London, EC3N 1LS.</p>
Our representative	<p>Ria Robinson</p> <p>Director of Membership & Governance</p>
Data Protection Panel	<p>The ACT panel consisting of the Director of Membership & Governance, Director of Finance, Head of ICT, Business Data Analyst, Assistant Company Secretary and ACT’s in-house lawyer), responsible for all aspects of data protection within ACT</p>
Personal information	<p>Any information relating to an identified or identifiable individual</p>
Special category personal information	<p>Personal information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership</p> <p>Genetic and biometric data</p> <p>Data concerning health, sex life or sexual orientation</p> <p>Information concerning any offences (including alleged offences), criminal proceedings, outcomes and sentences.</p>

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 and 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
- your professional online presence, e.g. LinkedIn profile
- your contact history, purchase history and saved items
- information you make 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 personal information we ask for 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.:

- 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;
- for our legitimate interests or those of a third party; or
- where you have given consent.

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

What we use your personal information for	Our reasons
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
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 unauthorised 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
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

What we use your personal information for	Our reasons
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
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 category 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) about our products and services, including exclusive offers, promotions or new products and services.

We have a legitimate interest in processing your personal information for promotional purposes (see above ‘**How and why we use your personal information**’) and it is in your legitimate interests and those of the wider treasury profession for you to receive those updates. This means we do not usually need your consent to send you promotional communications. However, 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.

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.

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. for Google Ads Similar audiences purposes)
- 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 or website hosts;
- 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 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 law.

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:

Andorra, Argentina, Canada (commercial organisations), Faroe Islands, Guernsey, Israel, Isle of Man, Jersey, New Zealand, Switzerland, Uruguay and the United States of America (limited to the Privacy Shield framework).

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/legal-content/en/TXT/?uri=CELEX%3A32010D0087>.

If you would like further information please contact our Data Protection Panel (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
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.
Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

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

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

- email, call or write to the ACT Data Protection Panel—see below: **‘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.

Online invigilation services

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

BTL 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, BTL 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 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 BTL 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

We hope that our Data Protection Panel 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/concerns> or telephone: 0303 123 1113.

Changes to this privacy policy

This privacy notice was published on 6 April 2019 and last updated on 1 August 2022.

This policy may change from time to time so please check this page occasionally to ensure that you're happy with any changes.

How to contact us

Please contact our Data Protection Panel by post, email or telephone if you have any questions about this privacy policy or the information we hold about you.

Our Data Protection Panel's contact details
P: 3 rd Floor, 150 Minories, London, EC3N 1LS
E: dataprotection@treasurers.org
T: +44 (0) 20 7847 2540