

Privacy Notice Students and Applicants to become Students

What is this document and who is it for?

This document is intended to provide you with important information about how we process your personal data. This includes details of what personal data we hold, how we store it, what we do with it, why we hold it and how long we hold it for.

The contents of this document apply only to students registered with the Association and applicants to become students. Please check the Association's website (www.acpa.org.uk) or contact the Association for a copy of a relevant privacy notice if you are not a student. Please note that if you are a student and have another relationship with the Association (for example, if you are also a member) then this privacy notice will apply to you, though other privacy notices may also apply.

The below 'summary information' section provides some general summary information about what we do with your personal data. Full details can be found in the table at the end of this notice.

Summary information

In order to provide you with the services and benefits offered to registered students the Association must hold and process personal data. The Association uses this information to; monitor who is and has been a student; send communications to you (including news and update bulletins, our digital magazine and information about upcoming seminars held by the Association); ensure you are compliant with CPAA rules and certain applicable legislation; and, to arrange for the delivery of assessments and tuition support.

We hold your personal data on our cloud-based databases, our outlook emails systems, as spreadsheets stored locally on our computers and, in some instances, as physical printouts stored in locked filing cabinets.

Becoming a registered student with the Association is voluntary and is not required to practice as an accountant. You provide us with your personal data so that we can offer you the various benefits and services of being a registered student with the Association.

Data Protection Policy

You should read this privacy notice in connection with the Association's data protection notice. The data protection policy can be accessed from our website or on request.

Data controller's and data protection officer's details

Data Controller: Certified Public Accountants Association (Incorporated in England under company number: 03448159)

Data Protection Officer: Lee Haywood

How to contact us with any questions

If you would like to contact us, please use the below methods. Please note that our office closes on weekends and English bank holidays. We normally close the office over the Christmas period, including some normal working days, please contact us for more information. If your contact relates to exercising your rights under data protection legislation it will help us if you make your communication in writing (either post or email).

Email: admin@acpa.org.uk

Telephone: 01204 693 988

Post: CPAA, Unit F, Lostock Office Park, Lynstock Way, Lostock, Bolton, Greater Manchester, BL6 4SG

Your rights

Under data protection legislation you have eight main rights relating to your personal data:

1. Right to be informed
2. Right of access
3. Right to rectification
4. Right to erasure
5. Right to restrict processing
6. Right to data portability
7. Right to object
8. Rights related to automated decision making including profiling

For more information on your rights and how we uphold your rights, please visit the Information Commissioner's Office's website (www.ico.org.uk) and review our data protection policy, which can be accessed from the relevant sections of our website or can be provided on request.

If at any time you would like to exercise one of your rights under data protection legislation, please contact us. We recommend that you consult our data protection policy before contacting us.

If you would like to make a complaint about the Association's handling of personal data and how we have met our obligations under data protection legislation you can contact the Information Commissioner's Office (www.ico.org.uk). Though we would always encourage you to contact us in the first instance so that we can attempt to resolve your complaint.

Personal data we process for members

Personal Data	Why is the Data Processed? (Lawful Basis)	Where is the Data is Stored?	Who has Access to the Data?	How long is the Data Kept?	Who else is the data transferred to?	Is the data transferred to a third country? (Name of Country)	Details of safeguards in place (if transferred to a third country)
Note							
<p>Information provided by applicants who do not successfully register as students is retained for a period of six months, in the event that the applicant wishes to join during this period. Information will be held on JotForm and Association email accounts during this time. Wild Apricot is 'Wild Apricot Inc. 144 Front Street West, Suite 725, Toronto, Ontario M5J 2L7, Canada' and is a provider of web-based tools for membership organisations, including data base tools. JotForm is 'JotForm' (https://www.jotform.com/about/) and is used to facilitate online registration, JotForm's servers are held in Germany. Cirrus is 'Cirrus Assessment Seizoentuinelaan 8. 3452 RA Vleuten (http://www.cirrusassessment.com/)' and is used by the Association to deliver assessments for its qualifications. MailChimp is owned by 'Rocket Science Group, 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308, USA (registered in Georgia, United States of America, with control number 17133268) and is a system used to send and track emails, which the Association uses to send some communications to members. Please note the Association has partnered with 'ProctorU 2200 Riverchase Pkwy Center, STE 600, Birmingham, Alabama, 35244, United States of America (Entity ID 944-357)', while use of ProctorU is not required the Association does recommended it to students where no other authorised invigilation is available. The Association will never transmit your data to ProctorU, unless you have given explicit consent in writing. In order to use ProctorU students may have to provide them with information, which will in turn be given to the Association. ProctorU is governed under the EU-US Privacy Shield Framework.</p>							
Full name including title	<ul style="list-style-type: none"> To assist in identifying the student To enable communications to be sent regarding the individuals student registration, for example, renewal information or information about upcoming assessments This data is processed under legitimate interest and to enable the execution of contact 	<p>This information is primarily stored on the Association's two database systems the; www.acpa.org.uk website and Wild Apricot. Data stored on the Association's website is held on Microsoft Azure Servers (https://azure.microsoft.com/en-gb/) and data stored on Wild Apricot is held on their servers (https://www.wildapricot.com/). For applicants' data is stored in JotForm (https://www.jotform.com/about/), but is deleted from here once the application has been processed. From time to time data might be transmitted by email, especially were it concerns applicants or ongoing issues. This data is stored locally on password protected computers and on Microsoft servers. From time to time data may also be stored in a physical format, this is always locked in a secure environment or destroyed after use.</p>	<p>All Association administration employees have access to this data. The data may, from time to time, in relevant circumstances, be transmitted to other members involved in the performance of the Association's disciplinary or management functions.</p>	<p>Indefinitely, as this allows the Association to maintain and identify past students, which it needs to do in the public interest and to ensure that it can identify who has been awarded a qualification.</p>	Cirrus MailChimp Provided to members of the public, regulators and law enforcement on request.	Canada USA	<p>Contractual clauses in the terms of use. Protections to ensure Wild Apricot cannot access specific details on a member. MailChimp has certified compliance with the EU-US Privacy Shield Framework</p>
Home address					Provided to members of the public, regulators and law enforcement on request.	Canada	
Contact address							
Phone number(s)							
E-Mail address					Cirrus MailChimp Provided to members of the public, regulators and law enforcement on request.	Canada USA	
Date joined/left	<ul style="list-style-type: none"> To identify when a student's renewal is To assist in identifying the student This data is processed under legitimate interest and to enable the execution of contact 				N/a	Canada	
Date of Birth	<ul style="list-style-type: none"> To assist in identifying the student To generate statistics and monitor the profile of the Association's membership/students This data is processed under legitimate interest and to enable the execution of contract 				Provided to law enforcement and regulators on request.	Canada	
Gender							
Nationality							
Ethnicity (Optional/Not required to provide)	<ul style="list-style-type: none"> This data enables the Association to identify if through any action, or lack of action, its qualifications are unfairly discriminating against a particular group, provision of this information is wholly optional This data is processed under legitimate interest 						
Religion (Optional/Not required to provide)							
Sexual Orientation (Optional/Not required to provide)							
Details of relevant qualifications achieved/held (both with the Association and with other providers)	<ul style="list-style-type: none"> To enable exemption requests to be processed To ensure that the Association is able to appropriately target tuition support This data is processed under legitimate interest (as it is a reasonable expectation that the Association will need to process this data in determining if a member meets the Association's requirements for membership) 						
				For a maximum period of six months	N/a		
				Indefinitely, as this allows the Association to maintain and identify past students, which it needs to do in the public interest and to ensure that it can identify who has been awarded a qualification.	Provided to members of the public, regulators and law enforcement on request.		

	and to enable the execution of contract					
Details of assessment attempts and scores	<ul style="list-style-type: none"> To enable qualifications to be appropriately awarded To highlight 'struggling' students and allow the Association to offer additional support This data is processed under legitimate interest (as it is a reasonable expectation that the Association will need to process this data in determining if a student has met the requirements to achieve a qualification) and to enable the execution of contract 	This information is primarily stored on the Association's two database systems the; www.acpa.org.uk website and Wild Apricot. Data stored on the Association's website is held on Microsoft Azure Servers (https://azure.microsoft.com/en-gb/) and data stored on Wild Apricot is held on their servers (https://www.wildapricot.com/). From time to time data might be transmitted by email, especially were it concerns applicants or ongoing issues.				
Details of exemptions awarded against CPAA assessments and justifications	<ul style="list-style-type: none"> To enable qualifications to be appropriately awarded To justify why a qualification was awarded This data is processed under legitimate interest (as it is a reasonable expectation that the Association will need to process this data in determining if a student has met the requirements to achieve a qualification) and to enable the execution of contract 	This data is stored locally on password protected computers and on Microsoft servers. From time to time data may also be stored in a physical format, this is always locked in a secure environment or destroyed after use.				
Details of any special consideration/adjustments awarded or requested	<ul style="list-style-type: none"> To enable the Association to evaluate and if appropriate facilitate the request and understand the impact upon the student. This data is processed under legitimate interest (as it is a reasonable expectation that the Association will need to process this data in order to evaluate and facilitate the request, it is also a reasonable expectation that the Association would need to understand historically and justify why a particular special consideration/adjustment was awarded) and to enable the execution of contract 					
Details of any disciplinary actions taken by other professional bodies and the Association	<ul style="list-style-type: none"> To effectively enact our disciplinary process and so that we can take a proportionate approach to quality assurance work To enable the effective defence of any legal proceedings resulting from disciplinary/compliance actions taken To ensure that the member meets the Association's Rules and Bye-Laws, a requirement for membership This data is processed under legitimate interest (as it is a reasonable expectation that the Association will need to process 			Indefinitely as this allows the Association to; maintain justifications for terminating a person's membership; provide due diligence information to other organisations; review and monitor the effectiveness of its disciplinary processes.		

	this data in determining if a member is a fit and proper person) and to enable the execution of contract						
Payment history with CPAA (for example missed subscriptions)	<ul style="list-style-type: none"> To enforce the Association's Rules and Bye-Laws, and any applicable procedures relating to missed/lapsed payments/subscriptions To ensure students receive services they have paid for (for example, assessments) This data is processed under legitimate interest 			For the duration the individual is a student or member of the Association.	N/a		
Payment Card Details	<ul style="list-style-type: none"> To process payment (for example, student fees) This data is processed under legitimate interest and to enable the execution of contract 	Card details are processed through secure trading.	The Association's Financial Controller. Other employees of the Association where there is a valid reason for access.	Card details are deleted after processing.	N/a	No	N/a