

## UK Trial Managers' Network (UKTMN)

### Privacy Policy

This policy (together with our Website's [Terms and Conditions](#)), together with any other documents referred to in it) describes how we collect and use your personal data during your use of our site, in accordance with the General Data Protection Regulation (GDPR) and associated data protection legislation.

(This Privacy Policy should be read in conjunction with [YourMembership.com Legal/Privacy Policy Notice](#)).

The UK Trial Managers' Network (UKTMN) is committed to preserving the privacy of all visitors to our website at <http://www.tmn.ac.uk> (the "Website"). Before you proceed with use of the Website, please read the following privacy policy (the "Policy") carefully to understand how we use and protect the information that you provide to us.

This Policy, together with our [Terms and Conditions](#) sets out the basis on which any personal data that we collect from you, or that you provide to us, will be processed by us.

Please be aware that this Policy only governs our use of personally identifiable information that is collected when you are on the Website. This Policy does not extend to the use of data submitted to or through any third party websites to which links may be provided on the Website, and we strongly encourage you to review the privacy policies of those other websites in order that you understand how they collect, use and share information.

The University of Oxford is the 'data controller', with the data managed on a day-to-day basis by the UKTMN secretariat in the Nuffield Department of Population Health (NDPH). UKTMN website users may be assured that UKTMN is committed to protecting privacy and to processing all personal information in a manner that meets the requirements of the Data Protection Act/GDPR.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

By visiting our site you are accepting and consenting to the practices described in this policy.

#### **1 Information we may collect from you**

We may request personally identifiable information from you in order that you may participate in the Website's services, activities or features. The personally identifiable information collected may include (without limitation) your first name, last name, e-mail address, address, preferences, account name, account password, answer to security question and/or mother's maiden name. We may also collect information about your usage of the Website as well as information about you from any surveys carried out by us, messages you post to any forum or message board and emails, letters and other communications you may send to us from time to time.

When you submit personally identifiable information to us through the Website, you agree that such information may be stored and processed by us and/or on our behalf. We may also collect information about your interaction with the Website and the services on the Website. We receive and record information on our server logs from your browser including your IP address, cookie information (see further below) and the page(s) you requested. In particular, we reserve the right to perform statistical analysis of user behaviours and characteristics in order to measure interest in and use of the various areas of the Website and to ascertain the number of users that have visited particular pages of

the Website. We will provide only aggregated data from these analyses to third parties, and such statistical data will not identify any individual.

## **2 Where we store your personal data**

Under British and European law we have to make clear that your personal data may be supplied to third parties, outside the European Economic Area ("EEA"). It is important to note that the UKTMN website is provided and hosted by YourMembership.com, an US based company.

Please note that if you submit your personally identifiable information to us, you will be giving your consent to the transfer and storage of this information outside the European Economic Area ("EEA") including United States. The information we collect is solely used to provide services to our members and report to our funders.

**Neither we nor YourMembership.com will rent or resell your personal information to third parties for marketing purposes.** The information we collect is solely used to provide services to our members.

For your information, our provider, YourMembership.com adheres to the EU-US Privacy Shield Framework principles regarding the collection, use, and retention of personal information covered by the Privacy Policy from the European Union. Please note however that the UKTMN is not responsible for the privacy practices of our website provider YourMembership.com. For details of the YourMembership.com privacy policy please refer to the following [Legal/Privacy Policy Notice](#).

## **3 Security**

All information you provide to us is stored on our providers secure servers.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Our website providers employ security measures to help safeguard the information we collect from you on the Website, including technical and organisational measures designed to secure your personal information from accidental loss and from unauthorised access, use, alteration or disclosure. However, the Internet is an open system and it is not guaranteed that unauthorised third parties will never be able to access or use your personal information for improper purposes. Accordingly any transmission of your personal data to our site is at your own risk.

For information on our provider system security and data backup please visit their website at <https://www.yourmembership.com/company/technology/>

## **4 Uses made of the information**

We collect and use your information in order to give you a better service and to provide you with information you request, including information about UKTMN events and/or externally provided training courses. Your information is also used to fulfil your requests for certain services and/or to participate in certain UKTMN activities and make the Website more useful to you.

We use information held about you in the following ways:

- to ensure that content from our site is presented in the most effective manner for you and for your computer;
- to inform you about changes to the site;
- to let you know about any services and products you may be interested in or which you have requested from us;
- to carry out any contractual obligations we have to you; and to allow you to participate in interactive features of our service, when you choose to do so where we have provided

subscription services to you, we will only contact you by electronic means (e-mail) with information about the services.

## 5 The legal basis for processing your data

We will only use your personal data where the law allows us to do so. Most commonly we rely on the following legal bases for processing your personal data:

- If you are using the publically accessible areas of the website we have a **legitimate interest** to process your personal data for purposes listed within this privacy notice. Where we use legitimate interest as the basis for our processing we have carefully considered each of the ways we process your data to ensure that we carry out our activities with a focus on the interests of our members and in the most efficient and effective way.
- Where you are a full member of UKTMN, paying a subscription, processing is necessary to meet our **contractual obligations** to you. Information processed for this purpose includes, but is not limited to, the information you provide when you register as a member.
- Where you are an affiliate member of UKTMN, non-paying member, your **consent** is required and is given when registering to be an affiliate member, for example where your personal data is recorded. You can withdraw your consent at any time and we will stop any processing of your personal data requiring your consent. See point 10.

## 6 Change of purpose

We will only process your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another related reason and that reason is compatible with the original purpose. If we need to use your data for an unrelated purpose, we will seek your consent to use it for that new purpose. Please note that we may process your data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 7 IP Addresses and Cookies

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration.

Although this site uses cookies technology, please note that no personal data about you is collected without your prior knowledge and consent. Cookies contain information that is transferred to your computer's hard drive. We use cookies only to facilitate automated activities, store and track passwords and review navigation patterns. Cookies enable us, for example:

- to estimate our audience size and usage pattern;
- to store information about your preferences, and so allow us to customise our site according to your individual interests;
- to speed up your searches; and
- to recognise you when you return to our site.

If you do not wish to accept our cookies, you can activate the setting on your browser which allows you to refuse cookies but please note that this may prevent you accessing certain parts of our site.

## 8 What Privacy Issues Arise With Links To Other Sites?

This website contains links to other websites. UKTMN has no control over and is not responsible for the privacy policies or content of such sites. The privacy policies and practices contained in this privacy statement do not apply to any external links. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## 9 Changes to this Policy

This Policy was last updated on 23 May 2018. We reserve the right to change this Policy at any time. Any changes in the future will be posted to the Website. Accordingly, we recommend that you check this page periodically in order to review our current Policy.

## 10 Your rights

Under certain circumstances, by law you have the right to:

- **Request access to your data** (commonly known as a "subject access request"). This enables you to receive a copy of your data and to check that we are lawfully processing it.
- **Request correction of your data.** This enables you to ask us to correct any incomplete or inaccurate information we hold about you.
- **Request erasure of your data.** This enables you to ask us to delete or remove your data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your data where you have exercised your right to object to processing (see below).
- **Object to processing of your data where we are relying on our legitimate interests** (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- **Request the restriction of processing of your data.** This enables you to ask us to suspend the processing of your data, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer of your data to another party.**  
Depending on the circumstances and the nature of your request it may not be possible for us to do what you have asked, for example, where there is a statutory or contractual requirement for us to process your data and it would not be possible to fulfil our legal obligations if we were to stop. However, where you have consented to the processing (for example, where you have asked us to contact you for marketing purposes) you can withdraw your consent at any time by emailing us at [tmn@ndph.ox.ac.uk](mailto:tmn@ndph.ox.ac.uk). In this event, we will stop the processing as soon as we can. However, this will not affect the lawfulness of any processing carried out before your withdrawal of consent and you may no longer be able to use the site in the same way as you did before.

If you want to exercise any of the rights described above or are dissatisfied with the way we have used your information, you should contact the University's Information Compliance Team at [data.protection@admin.ox.ac.uk](mailto:data.protection@admin.ox.ac.uk). The same email address may be used to contact the University's Data Protection Officer. We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of the GDPR. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

If you remain dissatisfied, you have the right to lodge a complaint with the Information Commissioner's Office at <https://ico.org.uk/concerns/>.

## 11 Governing Law

UKTMN is a UK organisation. This privacy policy is intended to be interpreted under English law. However, please note that the privacy policy of our website providers Yourmembership.com will be interpreted under the US Law-Florida.

**Contact**

If you have any questions, concerns, comments, or complaints regarding this privacy policy or the data that we collect or use, please contact the UK Trial Managers' Network by email at [tmn@ndph.ox.ac.uk](mailto:tmn@ndph.ox.ac.uk) or by writing to us at the following address:

UK Trial Managers' Network  
Nuffield Department of Population Health  
University of Oxford  
Richard Doll Building  
Old Road Campus  
Roosevelt Drive  
Oxford  
OX3 7LF

**Further information on privacy and data protection (GDPR)**

Website of the Information Commissioner's Office

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>