



Triple P – Positive Parenting Program®

Privacy Notice; Triple P Events - United Kingdom and the Republic of Ireland

Effective as of August 2022

The Triple P Group (“TPG”) is a group of companies that are responsible for the dissemination of the Triple P-Positive Parenting Program® (“Triple P”) and the Positive Early Childhood Education Program (“PECE”), throughout the world. This includes delivering Triple P events/courses to practitioners. This Privacy Notice relates to Triple P events held in the United Kingdom (“UK”) and/or Republic of Ireland (“Ireland”), which may be held in person or remotely.

To deliver Triple P Events (note this term includes the different components that may be applicable for a course e.g., training, pre-accreditation workshop, accreditation and clinical workshop) we collect personal data from practitioners, both prior to and during the events (the Triple P event process). This Privacy Notice provides information about the personal data collected from practitioners throughout the Triple P event process and information regarding how we will use, store, secure and share that data. This Privacy Notice also contains information about people’s rights with respect to what TPG does with their personal data.

We recognise that we have a responsibility to ensure that we comply with all relevant legal, regulatory and contractual requirements in the collection, storage, use and destruction of confidential information, including personal data. Of particular relevance to the collection of data when holding Triple P events in the UK and Ireland, are the requirements under the EU’s *General Data Protection Regulation* (“GDPR”) and also the UK’s *Data Protection Act 2018* (“DPA”) and the UK’s *Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019*, which alters the UK’s data protection regime so it works now that the UK have left the EU. The new data protection regime is known as the UK GDPR. We note that there is very little difference between the EU GDPR and the UK GDPR, so throughout this document have simply referred to the GDPR. TPG is committed to protecting our customers’ privacy and to respecting applicable privacy and data protection laws.

WHO WE ARE

Triple P is a parenting and family support strategy developed by Professor Matthew Sanders and colleagues at the University of Queensland in Brisbane, Australia. Triple P aims to prevent severe behavioural, emotional and developmental problems in children by enhancing the knowledge, skills and confidence of parents and is designed for use by a variety of health, education and social care professionals. TPG is responsible for the dissemination of Triple P throughout the world. TPG comprises Triple P International Pty Ltd (“TPI”) and its related bodies corporate, including Triple P UK Limited (“Triple P UK”). TPI is an Australian company whose postal address is PO Box 1300, Milton, QLD, Australia, 4064. Triple P UK is a British company whose postal address is BM Box 9068, London, England, WC1N 3XX.

Triple P UK is the provider of the Triple P events held in the UK/Ireland and is the Data Controller with respect to the information collected during the Triple P event process. That means Triple P UK makes the decisions regarding how and why the personal data collected, will be processed. If practitioners have any questions about this Privacy Notice or our use of their personal data, they should contact TPG’s Data Protection Officer at dpo@triplep.net or by post using Triple P UK’s address. Where possible, we ask that correspondence with the Data Protection Officer be by email, rather than by post, as this allows the Data Protection Officer to respond more quickly to people’s queries.

THE TYPES OF PERSONAL DATA WE COLLECT DURING THE TRIPLE P EVENT PROCESS

This Privacy Notice contains information about the personal data we collect from practitioners who decide to attend a Triple P Event. It relates to the data collected throughout the entire Triple P event process. Please note that this Privacy Notice is provided to/made available to practitioners at every stage of the process, when we seek to collect their data. Personal data is collected:

1. When a practitioner registers for a Triple P event.

Triple P UK facilitates two types of Training Courses in the UK/Ireland; Open Enrolment courses and Agency courses (which are separately arranged with individual Agencies for their personnel). Whilst the method of collection may vary, the same types of data are collected from practitioners attending Open Enrolment and Agency Training courses. For Agency courses, registration details will be collected via email with the nominated lead Agency personnel. For Open Enrolment events, pre-registration details may be collected via email with the practitioner or via the Open Enrolment website, with final registration completed via email by return of the completed registration form.

2. When a practitioner completes the Additional Needs Disclosure Form (if applicable); and
3. When a practitioner completes forms provided to them before/during or after a Triple P event (note the event could be a Training, Pre-accreditation Workshop, Accreditation and / or Clinical Workshop event).

This Privacy Notice is also provided to practitioners in the welcome email sent upon registration and is permanently available on the provider network, which all trained and accredited practitioners have access to.

Information Collected at Registration

Open Enrolment website Pre-registration / Expressions of Interest

Practitioners may pre-register their interest to attend Open Enrolment Triple P events, through the Open Enrolment website (<https://www.triplep.net/provider-training-find-a-course/en/triple-p-training/#section-check-your-calendar>).

The website will collect limited, mandatory contact information from the practitioner (First Name, Surname, email address, phone number, number of attendees seeking to register & country). This information will be used for administrative purposes:

1. To automatically generate and send the practitioner an email which contains:
 - Details of the course they have expressed interest in,
 - A copy of the information they provided through the website;
 - The contact information for the Triple P Operations Coordinator (“OC”);
 - This Privacy Notice; and
 - A Registration Form, which the practitioner will need to complete and return to the OC by email, in order to complete their registration for the course.
2. Where the practitioner does not respond within two (2) working days to the automated email, the OC will send the practitioner a reminder email.

3. We collect the country where the practitioner resides, as the Open Enrolment website is used by TPG to collect pre-registration for courses scheduled in many countries, not just the UK and Ireland. If a person who resides in another country registers to attend Triple P event in the UK or Ireland, we will communicate with that practitioner to identify if there is alternate Triple P event which may be more suitable (i.e. time zone) and to identify if appropriate resources (translations) are available for the delivery of Triple P in their country.

Triple P UK relies on its Legitimate Business Interest, when it processes the practitioner's personal data to send them the automated email and the follow up email (where applicable). We have a legitimate interest in following up on an expression of interest in upcoming Triple P events and to liaise with prospective attendees.

The Open Enrolment website also seeks to collect optional (discretionary) information regarding the organisation where the practitioner works. The information sought includes the organisation name, the type of organisation (i.e., company, charity, government body etc.) and an estimate of how many families the practitioner assists per year. This information is gathered for statistical purposes only. We have a legitimate business interest to undertake statistical analysis for the purposes of better understanding our clients, informing our business activities and to build our evidence base.

Email Registration

Registration via email primarily occurs when a practitioner (or agency) contacts Triple P UK's OC to request the Open Enrolment course calendar (timetable) or where an agency contacts the OC to arrange separate Agency Training/Accreditation.

1. For Open Enrolment Events; the practitioner (or agency representative) will be emailed a copy of the Registration Form and this Privacy Notice, when they are provided with the Open Enrolment timetable. They will need to complete and return the Registration Form to the OC by email, in order to complete the registration for the event. The OC will send the practitioner a reminder email when appropriate.
2. For Agency Training Events, the Operations Manager (OM) will provide this Privacy Notice to the Agency Representative, as well as requesting the Agency Representative to collect and return via a password protected excel, the Registration details of their practitioners for the Triple P events planned and agreed between both parties. Triple P UK relies on its Legitimate Business Interest, when processing personal data to follow up on expressions of interest/enquiries about upcoming Open Enrolment or Agency events.

The Contact Details Collected via the Registration Form

The Contact Details section of the Registration Form asks practitioners (for Open Enrolment events) and the Agency Representative (on behalf of their practitioners for Agency events) to provide us with the following personal data:

1. Their first and last name;
2. The organisation where they work;
3. Their role (job title);
4. Their phone number;

5. Their email address;
6. Their delivery address for resources (this may be their home address or work address – see further information below for more detail).
7. The course they are enrolling in; and
8. What, if any, Triple P courses the practitioner has previously completed.

We use this information for administrative purposes, to facilitate and manage a practitioner's attendance at the relevant Triple P events. The legal basis of our holding and processing their personal data is for the performance of a contract, in providing the Triple P event to the practitioner. Examples of how a practitioner's information will be used for these purposes includes:

- Their name and email address will be used to set up their access to the Triple P Provider Network prior to the Training event. The Provider Network contains information and tools to assist trained practitioners in using Triple P in their clinical practice. We use the data in this way, so that the practitioners may access the relevant tools as of the first night of the Triple P event.
- Their name and email address will be used to send the practitioner a confirmation email, either at the time the Registration Form is received or at least one month before the event is scheduled to start. For remote events, the confirmation email will include instructions on how to access the event on the videoconferencing platform as well as the link to the electronic resources (online forms). Information regarding the personal data collected in these forms and how that data will be processed, is set out in detail below. For practitioners who register for Open Enrolment via their organisation (Agency), the Manager at the Agency may be copied into the event confirmation email.
- Where a practitioner will be attending a remote Pre-accreditation workshop and/or an Accreditation event and/or Clinical Workshop event, their name and email address are used to send the practitioner the electronic resources (online forms), in the same way as described above for training events. The practitioner will be asked to complete the forms at the end of the Triple P event.
- Where a practitioner will be attending a remote Triple P training event, we will use their delivery address to send the practitioner physical resources such as Participant Notes and Facilitator Kits. The practitioner will receive an email confirming the dispatch of these materials from the TPG warehouse staff. We note that the delivery address for resources, may be either the practitioner's work or home address. If a practitioner is working from home, we ask that they provide their home address for delivery purposes. Should the delivery of resources not arrive on time, they practitioner will be provided with an electronic copy of the Participant Notes, as they will need these during the event. Please note that it is the practitioner's responsibility to provide the correct address and Triple P UK and its related bodies corporate will not be responsible if resources are lost/delayed due to incorrect/incomplete address being provided.

The Payment Details Collected via the Registration Form (Open Enrolment Only)

In this section of the Registration Form we collect the following data regarding the organisation or individual paying for the Training/Accreditation event:

1. Name;
2. Postal address;
3. Email address; and
4. Phone number.

The information we collect is needed to facilitate payment for the event, which will include the creation of a customer record and invoice and sending the invoice to the nominated email account. The legal basis of our collecting and processing this data, is the performance of the contract in providing the Triple P event to the practitioner/agency.

Triple P UK accepts payment by electronic transfer or by cheque. Practitioners (or Agencies) may also request to pay by credit card. Where payment is made using a credit card, the payment will be made via PayPal. We will not receive the customer's credit card information. PayPal will be the Data Controller with respect to the credit card information and practitioners (or agencies) seeking to pay for the course this way, should consult PayPal's Privacy Policy and Privacy Notice for further information about how PayPal will deal with their data.

We collect a practitioner's (or agency's) billing information but not their banking/payment information, except where payment is made by cheque, as retention of a copy of the cheque is required to comply with financial record keeping laws.

Information Collected via the Additional Needs Disclosure Form

We ask that practitioners tell us if they have an additional need which they believe may affect their participation in the Triple P event. TPG (including Triple P UK) and the Trainer(s) who will run the course, need to be made aware of any additional need, if we are to adequately accommodate the practitioner's needs, if possible, when delivering the course. If provided, the information will be used for that purpose only.

The GDPR treats health data (which may include information about an additional need) as a special category of personal data. In order to collect, process and in limited circumstances disclose this type of data, we must obtain the practitioner's express consent. For that reason, we ask practitioners to complete and sign the Additional Needs Disclosure Form, which contains a statement of consent for our collection, use and limited disclosure (sharing) of this particular type of personal data. We ask the practitioner to consent to our disclosing the information about their additional need, to the Trainer(s) who will provide the Triple P event. The Trainer(s) will be either an employee of TPG or an independent contractor. All of our Trainers have undertaken training on the data protection requirements in Europe under the GDPR and are aware of their privacy and data security obligations.

The Statement of Consent asks for the practitioner's signature, which is a type of personal data. It is collected for the purpose of demonstrating that the practitioner has read and agreed to TPG's collection, use and disclosure of the special category personal data in accordance with Disclosure Form and the information provided in this Privacy Notice. We collect both the practitioner's name and email address on the form, so that we may properly identify the practitioner. We require both pieces of data as there may be an occasion where two or more course attendees have the same name.

The legal basis of our processing the personal data regarding a practitioner's additional need, is consent. Practitioners may withdraw their consent at any time by contacting the Data Protection Officer at

dpo@triplep.net or by post using Triple P UK's address (see above). If possible, we ask that any contact with the Data Protection Officer be by email, as this allows us to respond more quickly.

We note that should a practitioner withdraw their consent, this will not affect the lawfulness of any processing of the data (regarding the practitioner's additional need), that occurred prior to the withdrawal of consent. If their consent is withdrawn before the Triple P event, this will mean that TPG (including Triple P UK) and the Trainer(s) will be unable to take any steps to accommodate the practitioner's additional need at the Triple P event.

Complaints Regarding Additional Need

If a practitioner (who completed the Disclosure Form and did not withdraw their consent prior to the Triple P event) is unhappy with TPG's (including Triple P UK's) and/or the Trainer's attempts to accommodate their needs (if possible) at the Triple P event, we ask that they please contact Triple P UK to make a complaint. In order to investigate the complaint, we will need to process and disclose the practitioner's personal data, including the information about their additional need, to the Head of Training, who is an independent consultant. Personnel at Triple P UK and TPI will be involved in the investigation of the complaint, as Triple P UK has outsourced various business functions to TPI. TPI is an authorised data processor for Triple P UK. Accordingly, in those circumstances Triple P UK would seek to obtain a further statement of consent from the practitioner. In that statement the practitioner would provide their explicit consent for Triple P UK to process their data, including to disclose it to TPI and to the Head of Training, for the purpose of investigating their complaint. We note that all TPI Personnel and the Head of Training, have completed training on the data protection requirements in Europe under the GDPR and are aware of their privacy and data security obligations.

Information Collected During the Triple P Training event

As explained above, where a practitioner attends a Triple P event, Triple P UK will seek to collect limited personal information from them via various electronic (online) forms. These include:

1. Statement regarding Ongoing Research;
2. Electronic Communications Consent Form;
3. Benefits and Conditions of Accreditation Statement;
4. Contact Details Form;
5. Parent Consultation Skills Checklist (Pre-Training Assessment);
6. Parent Consultation Skills Checklist (Post-Training Assessment); and
7. Training Workshop Evaluation Survey.

Statement regarding Ongoing Research

Triple P is an evidence-based programme and the ongoing evaluation of Triple P events is part of our evidence-based approach. The data that is collected via the skills checklists and evaluation forms, will be used to evaluate the effectiveness of the Triple P Training. Triple P UK has a legitimate business interest in identifying ways to improve the Training we offer. This is our purpose for using practitioner's personal data in this way. The form also refers to practitioners being entered on a register of trained Triple P providers.

Maintaining a complete register of trained practitioners is essential for Triple P UK's and its related bodies corporate's business. Triple P UK (and TPG) relies on its legitimate business interest as the lawful basis for processing personal data associated with the creation and maintenance of this register (further information is provided below).

The Electronic Communications Consent Form

We provide practitioners with the Electronic Communications Consent Form, as TPG would like to send them electronic direct marketing information. We respect the privacy of our customers and seek to assure practitioners that we will not abuse their trust, and if they decide to subscribe to our electronic direct marketing, will send them limited, relevant messages and will only ever send them messages that relate to Triple P.

The types of messages we typically send include:

- Emails promoting Open Enrolment Courses that the practitioner may be interested in attending. Practitioners would typically receive this type of email when the courses are scheduled and one or two reminder emails as the courses draw near.
- The Triple P Newsletter, which may include:
 - General information about Triple P, Triple P UK and/or TPG;
 - Information about developments regarding Triple P;
 - The Triple P Introductory Guide and other tools that we may offer from time to time;
 - Information about research relevant to Triple P;
 - Case studies and/or testimonials;
 - General information about Triple P products and services, including special offers, new products releases and product updates; and
 - Information about Open Enrolment training events and other events that are being offered.

We ask practitioners to select the tick-box if they consent (the legal basis we rely on) to receive electronic direct marketing messages from TPG. By ticking the box, a practitioner demonstrates that they have agreed to sending them direct marketing electronic messages. We also ask the practitioner to enter the date when their consent was given.

Practitioners may unsubscribe from receiving TPG's electronic communications at any time by clicking on the unsubscribe link that appears in the footer of all of our emails or by contacting the Data Protection Officer. Practitioners may also update their subscription preferences at any time, so they only receive the types of messages they are interested in receiving. A link to the subscription preferences appears in the footer of all of our emails. Should a practitioner unsubscribe, we will cease sending them direct marketing messages. We note that any associated processing of their data, prior to the withdrawal of consent, will remain lawful.

Benefits and Conditions of Accreditation Form

This form outlines the benefits of and the conditions for acquiring accreditation in the provision of Triple P in a practitioner's work. The form asks for the practitioner to select the tick-box, for the purpose of demonstrating that the practitioner has read and agreed to the conditions of accreditation. Triple P UK has a legitimate business interest in documenting that practitioners understand the conditions of accreditation. Whilst we seek

their acknowledgement, failure by a practitioner to select the tick-box will not prevent them from achieving accreditation, provided attendance and other criteria are met.

Contact Details Form

The Contact Details Form will ask for the following personal data:

- The practitioner's name (mandatory);
- The practitioner's date of birth (mandatory);
- The practitioner's contact phone number;
- The practitioner's preferred email address (mandatory);
- The practitioner's country of residence (mandatory);
- The practitioner's qualifications;
- The area of the practitioner's training;
- How many years of experience the practitioner has in parent consultation relating to child behavior;
- The average number of hours per week the practitioner spends in parent consultation relating to child behavior; and
- Details about the practitioner's employment including their employer's name, location, position, whether their employer would be classified as government, private, research etc. and the sector that their organisation is part of.

We note that only four of the information fields are mandatory. Providing the other data is discretionary. Our Trainers will provide guidance to course attendees at the start of the course, regarding what information fields in this form are mandatory or optional. Triple P UK will use the mandatory personal data to compile a register of persons trained to deliver Triple P in the UK and/or Ireland. Triple P UK and the wider Triple P Group, have a legitimate business interest in having a comprehensive list ("register") of all practitioners in the UK and Ireland who are trained and/or accredited in the delivery of Triple P. The register enables us to ensure practitioners are provided with information about updates to the program and to identify anyone falsely asserting that they are trained and/or accredited to provide Triple P (the Positive Parenting Program), so we may take appropriate action. Without the ability to do so, Triple P's reputation may be adversely affected. It is also in the interests of our trained and accredited practitioners, that Triple P's good reputation is maintained.

The optional/discretionary information collected in this form, is gathered for statistical purposes only. We have a legitimate business interest to undertake statistical analysis for the purposes of better understanding our clients, informing our business activities and to build our evidence base.

We will use the practitioner's contact information for a variety of administrative purposes, which include:

- To track their progress through the course/course modules and facilitate accreditation. We have a legitimate business interest in using their data in this way, as it is essential that we can identify who has attended the relevant training, in order to provide accreditation.
- To set up their access to our Provider Network and to send the practitioner instructions for logging into the Network, if for any reason their access was not set up prior to the Triple P event. The Provider Network

contains information and tools to assist practitioners in using Triple P in their clinical practice. The practitioners will receive access to the tools that relate to the particular Triple P Training they have attended. We have a legitimate business interest in ensuring that practitioners providing Triple P, have access to information and tools to assist them in the proper delivery of the program.

- To facilitate the shipment of training and programme resources to practitioners. We rely on our legitimate business interest in ensuring that trained practitioners have information and tools to assist in the proper delivery of the program.

Parent Consultation Skills Checklist (Pre-Training Assessment)

This form asks practitioners to provide information about how they feel about providing Triple P in their practice, prior to undertaking the Training course. The questions address how adequately they feel they are trained and how confident they are in delivering Triple P.

Parent Consultation Skills Checklist (Post-Training Assessment)

This form asks practitioners to provide information about how they feel about providing Triple P in their practice, after completing the Training course. The questions address how adequately they feel they are trained and how confident they are in delivering Triple P.

Training Workshop Evaluation Survey

This form asks for a practitioner's opinions about the Training event(s). Most questions relate to the performance by the Trainer and quality of the call (for remote courses run via video conferencing software) or the quality of the venue (for in-person courses). Practitioners will also be asked if they feel they now have the skills needed to implement Triple P in their work.

How We Use the Data Collected in the Checklists and Surveys

Completing the Parent Consultation Skills Checklists and the Training Workshop Evaluation Survey is discretionary. The opinions practitioners provide in these documents, will be added to their record on our customer relationship management ("CRM") system. They will be used to provide feedback to the Trainer(s), for the purpose of improving their delivery of the Training and/or Accreditation courses. As identified above, the data in these forms may also form part of our evidence base for the program. In that instance, we will process the data (in de-identified form) for the purpose of evaluating the effectiveness of the Triple P Training. By 'de-identified', we mean that the data will not be attributable to a particular person. Triple P UK and the Triple P Group have a legitimate business interest in providing feedback to our Trainers and compiling the global Triple P evidence base.

Information Collected During the Triple P Pre-Accreditation Workshop Event

The Pre-Accreditation Workshop Evaluation Form will be provided to practitioners who attend a Triple P Pre-Accreditation workshop. It collects limited personal data including:

1. Name;
2. Course;
3. Email;
4. Date; and
5. Opinions

This form asks a practitioner to provide their opinions about the Pre-Accreditation Workshop event. Whilst most questions relate to the quality of the call (video conferencing software, with respect to remote events) or venue (with respect to in-person event) and the Trainer/training, the practitioner will also be asked if they feel they now have the skills to implement Triple P in their practice. The data collected will be used for the purposes described above, regarding the equivalent form used at Training events.

Information Collected During the Accreditation Event

Practitioners attending a Triple P Accreditation event, will be provided with the following forms, which collect limited personal data:

1. Accreditation Application Form;
2. Parent Consultation Skills Checklist (Follow-up Assessment); and
3. Accreditation Workshop Evaluation Survey.

Accreditation Application Form

This form collects the following personal data:

1. The practitioner's name (first name, family name and any previous name);
2. How the practitioner would like their name to appear on their certificate of accreditation;
3. The practitioner's Date of birth;
4. The email address the practitioner wishes to use to log into the Triple P Provider Network;
5. The date the practitioner attended the relevant Triple P Training event;
6. The city where the Training Event took place;
7. The date the practitioner attended the Triple P Accreditation event;
8. Whether the practitioner would like their certificate of accreditation mailed to their residential address, work address or to a PO box.
9. The relevant address;
10. The practitioner's employer's name (if they choose to send the certificate of accreditation to their work address); and
11. the practitioner's signature in acknowledgement that they have read, understood and agreed to be bound by the Triple P Providers' Code of Conduct.

On this form the Trainer will also record whether the practitioner passed or must recycle (retake) the quiz and/or the assessment against the set competencies.

Triple P UK will use the information collected in this form for a variety of administrative purposes, including:

- To maintain an accurate record of those practitioners who achieved accreditation;
- To produce the practitioner's certificate of accreditation and send it to them;
- To provide the practitioner with ongoing access to the Triple P Provider Network. The practitioner will be asked to confirm the email address they wish to use to access the Provider Network, as accreditation may be completed sometime after the practitioner attended the associated Training Event and their email

address may have changed.

Parent Consultation Skills Checklist (Follow Up Assessment)

This form asks a practitioner to provide information about how they feel about providing Triple P in their practice, after completing the Triple P Accreditation event. The questions address how adequately the practitioner feels they are trained and how confident they are in delivering Triple P. The data collected will be used for the purposes described above, regarding the equivalent form used at Training events.

Accreditation Workshop Evaluation Survey

This form asks a practitioner to provide their opinions about the Accreditation event(s). Whilst most questions relate to the quality of the call (video conferencing software) and the Trainer, the practitioner will also be asked if they feel they now have the skills to implement Triple P in their practice. The data collected will be used for the purposes described above, regarding the equivalent form used at Training events.

Information Collected during the Accreditation Process (if applicable).

If a practitioner takes part in the accreditation process, their personal data is collected via the completion of:

1. The Triple P Accreditation Quiz Answer Sheet; and
2. The Competencies Checklist.

Triple P Accreditation Quiz Answer Sheet

Practitioners will be emailed the Accreditation Quiz Answer Sheet, at the time they are sent the Accreditation schedule. Triple P UK asks practitioners to complete the quiz and return it to the Training Coordinator or Operations Coordinator (OC), prior to the associated Accreditation Event.

This form records the following personal data:

- The practitioner's name;
- The organisation where the practitioner works; and
- The practitioner's responses to the multiple-choice quiz that is part of the accreditation process.

The practitioner's answers to the quiz will be used by the Training Coordinator or the Trainer, to evaluate if that practitioner has passed, or if they need to recycle (retake) the quiz. Where a quiz forms part of an Accreditation Course, a practitioner will need to pass the quiz in order to achieve accreditation. Triple P UK does not keep a record of a practitioner's answers to the quiz. Triple P UK simply records whether the practitioner passed the quiz or whether there is a need to recycle the quiz. Triple P UK does not seek to recover these forms from the Trainer(s). If an Accreditation Quiz Answer Sheet is returned to Triple P UK (or any entity within TPG), the answer sheet will be securely destroyed. Our Trainers are instructed not to retain these forms after the accreditation event is complete, but rather to securely destroy them.

The Competencies Checklist

As a practitioner completes the accreditation exercises (role plays), the Trainer will record notes about their performance on this document. The Trainer will measure the practitioner's performance against set competencies for the purpose of determining whether the practitioner meets the accreditation requirements. The Trainer will evaluate if the practitioner has passed, or if they need to recycle (retake) the competencies assessment. Triple P UK does not keep a record of a practitioner's performance against the individual competencies. It simply records whether the practitioner has passed or whether there is a need to recycle

the role play exercises. Triple P UK does not seek to recover these forms from the Trainer(s). If a Competencies Checklist is returned to Triple P UK (or any other entity within TPG), the checklist will be securely destroyed. Our Trainers are instructed not to retain these forms after the accreditation event is complete, but rather to securely destroy them.

Information Collected During the Triple P Clinical Workshop Event

Where a practitioner attends a Triple P Clinical Workshop event we will seek to collect limited personal data via:

1. Electronic Communications Consent Form;
2. Contact Details Form;
3. Parent Consultation Skills Checklist (Pre-Workshop Assessment);
4. Parent Consultation Skills Checklist (Post-Workshop Assessment); and
5. Workshop Evaluation Survey.

The Electronic Communications Consent Form

We provide practitioners with the Electronic Communications Consent Form, as TPG would like to send them electronic direct marketing information. We respect the privacy of our customers and seek to assure practitioners that we will not abuse their trust, and if they decide to subscribe to our electronic direct marketing will send them limited, relevant messages and will only ever send them messages that relate to Triple P.

The types of messages we typically send include:

- Emails promoting Open Enrolment Courses that the practitioner may be interested in attending. Practitioners would typically receive this type of email when the courses are scheduled and one or two reminder emails as the courses draw near.
- The Triple P Newsletter, which may include:
 - General information about Triple P, Triple P UK and/or TPG;
 - Information about developments regarding Triple P;
 - The Triple P Introductory Guide and other tools that we may offer from time to time;
 - Information about research relevant to Triple P;
 - Case studies and/or testimonials;
 - General information about Triple P products and services, including special offers, new products releases and product updates; and
 - Information about Open Enrolment training events and other events that are being offered.

We ask practitioners to select the tick-box if they consent (the legal basis we rely on) to receive electronic direct marketing messages from TPG. By ticking the box, a practitioner demonstrates that they have agreed to sending them direct marketing electronic messages. We also ask the practitioner to enter the date when their consent was given.

Practitioners may unsubscribe from receiving TPG's electronic communications at any time by clicking on the

unsubscribe link that appears in the footer of all of our emails or by contacting the Data Protection Officer. Practitioners may also update their subscription preferences at any time, so they only receive the types of messages they are interested in receiving. A link to the subscription preferences appears in the footer of all of our emails. Should a practitioner unsubscribe, we will cease sending them direct marketing messages. We note that any associated processing of their data, prior to the withdrawal of consent, will remain lawful.

Contact Details Form

The Contact Details Form will ask for the following personal data:

- The practitioner's name (mandatory);
- The practitioner's date of birth (mandatory);
- The practitioner's contact phone number;
- The practitioner's preferred email address (mandatory);
- The practitioner's country of residence (mandatory);
- The practitioner's qualifications;
- The area of the practitioner's training;
- How many years of experience the practitioner has in parent consultation relating to child behavior;
- The average number of hours per week the practitioner spends in parent consultation relating to child behavior; and
- Details about the practitioner's employment including their employer's name, location, position, whether their employer would be classified as government, private, research etc. and the sector that their organisation is part of.

We note that only four of the information fields are mandatory. Providing the other data is discretionary. Our Trainers will provide guidance to course attendees at the start of the course, regarding what information fields in this form are mandatory or optional. Triple P UK will use the mandatory personal data to compile a register of persons trained to deliver Triple P in the UK and/or Ireland. Triple P UK and the wider Triple P Group, have a legitimate business interest in having a comprehensive list ("register") of all practitioners in the UK and Ireland who are trained and/or accredited in the delivery of Triple P. The register enables us to ensure practitioners are provided with information about updates to the program and to identify anyone falsely asserting that they are trained and/or accredited to provide Triple P (the Positive Parenting Program), so we may take appropriate action. Without the ability to do so, Triple P's reputation may be adversely affected. It is also in the interests of our trained and accredited practitioners, that Triple P's good reputation is maintained.

The optional/discretionary information collected in this form, is gathered for statistical purposes only. We have a legitimate business interest to undertake statistical analysis for the purposes of better understanding our clients, informing our business activities and to build our evidence base.

We will use the practitioner's contact information for a variety of administrative purposes, which include:

- To track their progress through the Clinical Workshop(s). We have a legitimate business interest in using their data in this way, as it is important that we can identify who has attended the relevant Clinical

Workshop.

- To facilitate the shipment of Clinical Workshop resources to practitioners. We rely on our legitimate business interest in ensuring that trained practitioners have information and tools to assist in the proper delivery of the program.

Parent Consultation Skills Checklist (Pre-Workshop Assessment)

This form asks practitioners to provide information about how they feel about providing Triple P in their practice, prior to undertaking the Triple P Clinical Workshop. The questions address how adequately they feel they are trained and how confident they are in delivering Triple P.

Parent Consultation Skills Checklist (Post-Workshop Assessment)

This form asks practitioners to provide information about how they feel about providing Triple P in their practice, after completing the Triple P Clinical Workshop. The questions address how adequately they feel they are trained and how confident they are in delivering Triple P.

Workshop Evaluation Survey

This form asks for a practitioner's opinions about the Clinical Workshop event(s). Most questions relate to the performance by the Trainer and quality of the call (for remote courses run via video conferencing software) or the quality of the venue (for in-person courses). Practitioners will also be asked if they feel they now have the skills needed to implement Triple P in their work.

How We Use the Data Collected in the Checklists and Surveys

Completing the Parent Consultation Skills Checklists and the Workshop Evaluation Survey is discretionary. The opinions practitioners provide in these documents, will be added to their record on our customer relationship management ("CRM") system. They will be used to provide feedback to the Trainer(s), for the purpose of improving their delivery of the Clinical Workshops. As identified above, the data in these forms may also form part of our evidence base for the program. In that instance, we will process the data (in de-identified form) for the purpose of evaluating the effectiveness of the Triple P Workshops. By 'de-identified', we mean that the data will not be attributable to a particular person. Triple P UK and TPG have a legitimate business interest in providing feedback to our Trainers and compiling the global Triple P evidence base.

Feedback from Trainers

The Trainer(s) may provide feedback about the behaviour of attendees at the Triple P event(s). For example, the Trainer may note that a particular attendee was disengaged and not involved in the event or that an attendee was disruptive. The Trainer's feedback may or may not contain identifiable personal information regarding a practitioner. When providing this feedback, most Trainers do not use the attendee's full name. Instead, they typically use the attendee's first name, initials or refer to an unnamed practitioner. The Trainer's feedback may be used as part of any investigation, should a complaint be made about the Trainer.

EMERGENCY CONTACT INFORMATION

At any time during the Triple P event/process, Triple P UK may ask a practitioner to provide the name and phone number of an emergency contact person. If collected, Triple P UK will hold the emergency contact data until the course has been delivered and will only ever use the personal data of the emergency contact person, if there is an emergency situation at the Triple P event and the practitioner needs their assistance.

Europe's data protection laws do not require Triple P UK to provide a Privacy Notice to a person nominated

as an emergency contact, if doing so would be impossible or require a disproportionate effort. Triple P UK relies on this exception. When a practitioner provides us with the personal data of their emergency contact person, it is the practitioner's responsibility to ensure that they have obtained that person's permission to share their data with us, before giving us their information. If a practitioner's emergency contact person would like further information, the practitioner should provide them with this Privacy Notice or direct them to TPG's Privacy Policy which is available on our website www.triplep.net.

AUTOMATED DECISIONS

Triple P UK and TPG do not make any automated decisions that might affect the practitioner. By automated decision, we mean a decision made solely by automated means without any human involvement.

HOW WE STORE AND SECURE YOUR PERSONAL DATA

As an international business, The Triple P Group, including Triple P UK, store data in a number of ways and locations. TPG utilises a network of its own computers in multiple countries, private physical IT infrastructure and third-party service providers whose infrastructure is used to store data. We are doing our utmost to protect your information and have put robust security mechanisms in place for the transfer and storage of your data.

The Training Data

The information collected from practitioners who attend Triple P Training Courses is mostly contained in the resources completed during the delivery of the course.

Triple P UK utilises a third-party (Alchemer) survey platform to collect information via electronic (online) forms. Alchemer recognises that the information collected through their platform is the property of the survey creator. That is, Triple P UK is the owner and data controller of any information collected via the online forms. Alchemer is an authorised data processor.

Alchemer provides that it will not, under any circumstances:

- Sell or rent customer information or respondent information to any third party; and/or
- Use Respondent Information for any purpose other than to provide services to our Customers.

Alchemer does not interact with the data collected through the surveys (respondent information), except where explicitly permitted by the survey creator. The only situation where Triple P UK would instruct Alchemer to interact with the respondent information, would be if our access to the data was disrupted and TPG's IT Department required Alchemer to investigate the issue and locate the data. Should this ever occur, the authority provided to Alchemer to access that data, would be limited to that purpose.

Further information about how Alchemer uses and protects personal data is available at:

- www.alchemer.com/privacy/ (their privacy policy);
- www.alchemer.com/privacy/gdpr/ and <https://www.alchemer.com/resources/blog/gdpr-commitment/> (information about compliance with the GDPR);
- help.alchemer.com/help/alchemer-security-overview; and
- help.alchemer.com/help/alchemer-security-overview#Information%20Security%20-%20Executive%20Summary.

We note the Data Security section of Alchemer's Privacy Policy, which summarises the security measures they have in place to protect the data they hold, such as the use of unique user names and passwords to access their platform. Alchemer's website states its commitment to "always meeting or exceeding GDPR

compliance”.

Alchemer explains that it encrypts data in transit, at rest and on all backups. The data collected via the online forms is initially stored in the Alchemer Platform, which compiles the responses for all attendees at a particular Triple P event into a report (excel spreadsheet) which can be access online and downloaded (exported from the platform). Access to the data within TPG’s Alchemer account(s) is restricted through access controls, to the Trainer(s) and to personnel in our Training Coordination Department. The Trainers only have access to reports for Triple P events they lead, and may log into the platform during the event to monitor completion of the forms and to assist practitioners.

TPG’s Training Coordination Department will export the reports shortly after the event is completed, and will save the reports to TPG’s private server, which is also located in TPI’s private office in Brisbane, Australia. Once the Coordinators are confident the report has successfully been saved to the server, they will delete any local copy of the downloaded file from their computer. The information collected at pre-registration and registration is also stored on the server. There are electronic and physical security mechanisms in place to protect TPI’s private office, which houses the server. The personal information stored on the server is not encrypted in transit or at rest, but is encrypted when the server is accessed remotely. Trainers may download the reports associated with their training session. Trainers are required to delete these files, and the electronic bundle, when instructed by the Training Coordinator. The Training Coordinators will regularly remove the data from the Alchemer platform. At this stage, the removal of the data will occur on a monthly basis

The forms (reports) will then be accessed by TPG’s Data Entry Department, and the information will be entered into a private database, with entries for each individual practitioner. The database links to TPG’s Provider Network and is stored in a private third-party (Oracle NetSuite) data warehouse located in the United States. The third-party (NetSuite) has extensive data security mechanisms in place including the encryption of data in transit and in back-up. Further information about how NetSuite secures the data stored in its data centers, is available at: <https://www.netsuite.com/portal/assets/pdf/ds-data-center-factsheet.pdf>.

Information Contained in Emails

Information about course attendees may also be contained in emails, for example when information is sent between TPG’s Training Coordination Department and the Trainers. Reports exported from Alchemer’s platform may also be shared within TPG via email. The reports are in the form of excel spreadsheets. Triple P UK routinely password protects excel spreadsheets which contain personal data, when sharing by email, TPG’s email network is controlled by TPI. The data contained in emails sent to and within the email network, is stored on the Amazon data warehouse in Sydney, Australia. The data is encrypted in transit and in backups. TPG believes Amazon’s data warehouse has sufficient security mechanisms in place and is appropriate for the storage of TPG’s emails. Further information about how Amazon secures the data stored in its data warehouses is available at:

- <https://aws.amazon.com/compliance/>; and
- <https://aws.amazon.com/blogs/security/all-aws-services-gdpr-ready/>.

Finance Data

Payment information will be processed when generating and sending invoice(s) and processing payment(s) of fees for Triple P events. Triple P UK has outsourced its finance function to TPI. TPI’s Finance Department

files have access restrictions and are stored on TPG's private server. Information regarding the location and security mechanisms in place to protect the server, is set out above in the section regarding the electronic resources.

Data for Delivery of Physical Resources

TPG stores physical materials in private warehouses in Australia and Hong Kong. Warehouse personnel are authorised to access limited personal data stored on the Oracle (NetSuite) database, when processing an order for the supply of materials. The authority is limited to accessing delivery information.

BASIS FOR TRANSFERS OF DATA OUTSIDE THE EU

The personal data collected during the Triple P event process may be transferred to and/or processed (including stored) in the following countries:

- The UK (devices such as computers);
- Australia (the Amazon Data Centre and TPI private IT infrastructure and Private Warehouse);
- The United States of America (USA) (Alchemer Data Centre and Oracle (NetSuite) CRM System); and
- Hong Kong (TPG's Private Warehouse).

Where training is conducted in the Republic of Ireland or the practitioner attending a Triple P event resides in the EU, the data will be transferred to the UK, which has now left the European Union.

The Triple P Group recognises that appropriate safeguards are needed with respect to cross border data flows. We endeavour to stay current with applicable international laws governing the transfer of data globally. Generally speaking, a central object of global privacy laws is to facilitate the free flow of information across borders while at the same time ensuring that people's privacy is respected. Europe's data protection laws allow for the transfer data outside the EU, including to countries whose data protection and privacy laws are not comparable to EU law, in certain circumstances. These include, for example, on the basis of the data subject's consent, on the basis of the use of standard contractual clauses approved by the European Commission or by selecting parties operating in countries considered safe by the European Commission (i.e., where there is an Adequacy Decision with respect to the data protection laws of a country outside of the EU).

Now that the UK has left the EU, the GDPR will be retained in domestic UK law and the associated legislation, the UK's Data Protection Act 2018, remains in place. As such, there will be continuity between UK legislation and the requirements set out in the GDPR, although the UK is able to review these laws and we note there will likely be further developments about how the particular issue of UK-EU transfers is dealt with. Europe's data protection laws allow for the transfer data outside the EU, including to countries whose data protection and privacy laws are not comparable to EU law, in certain circumstances. These include transfers to countries the subject of an Adequacy Decision and transfers covered by Appropriate Safeguards, which include but are not limited to transfers on the basis of the use of standard contractual clauses approved by the European Commission or Binding Corporate Rules.

The EU Commission has not made an Adequacy Decision (granted adequacy status) with respect to the UK. The EU Commission has not however made an Adequacy Decision with respect to Australia, Hong Kong and/or the USA. Further, in 2020 the Court of Justice of the European Union ("CJEU") invalidated the EU-US Privacy Shield as a lawful basis for data transfers under EU law. Accordingly, Triple P UK relies on Appropriate Safeguards when transferring data to and processing data in these countries.

- **Transfers to TPI:** Triple P UK has entered into a Data Processing Agreement and a Data Transfer Agreement with TPI, both of which use the Standard Contractual Clauses approved by the European Commission, which were made available through the UK's Information Commissioner's Office. Triple P UK relies on these Standard Contractual Clauses as an Appropriate Safeguard, when transferring personal data to TPI.
- **Transfers to Amazon (AWS):** Triple P UK has outsourced its data storage function to TPI, which utilises the AWS infrastructure in Australia for the storage of certain data. In transferring data from the EU to Amazon's infrastructure in Australia, we rely on the Appropriate Safeguard of Standard Contractual Clauses. The Triple P Group has been assured by Amazon ("AWS") that: *"At AWS, our highest priority is securing our customers' data, and we implement rigorous technical and organizational measures to protect its confidentiality, integrity, and availability regardless of which AWS Region a customer has selected. Additionally, we have industry leading encryption services that give our customers a range of options to encrypt data in-transit and at rest. Since the Court of Justice of the European Union has validated the use of Standard Contractual Clauses (SCCs) as a mechanism for transferring data outside the European Union, our customers can continue to rely on the SCCs included in the AWS Data Processing Addendum if they choose to transfer their data outside the European Union in compliance with GDPR."*

We also note the following extract from a blog on Amazon's website from May 2018 which states: *"Today, we're happy to announce that the AWS GDPR Data Processing Addendum(.pdf) is now part of our online Service Terms. This means all AWS customers globally can rely on the terms of the AWS GDPR DPA which will apply automatically from May 25, 2018, whenever they use AWS services to process personal data under the GDPR. The AWS GDPR DPA also includes EU Model Clauses, which were approved by the European Union (EU) data protection authorities, known as the Article 29 Working Party. This means that AWS customers wishing to transfer personal data from the European Economic Area (EEA) to other countries can do so with the knowledge that their personal data on AWS will be given the same high level of protection it receives in the EEA."* (<https://aws.amazon.com/blogs/security/aws-gdpr-data-processing-addendum/>)

- **Transfers to Oracle (NetSuite);** In transferring data from the EU to the Oracle infrastructure in the United States, we rely on Oracle's Binding Corporate Rules as the basis for transferring and storing personal data with Oracle. Oracle has assured its customers that the European Court of Justice decision invalidating the EU-U.S. Privacy Shield has *"no impact on the provision of Oracle Services"* as *"While(sic) Oracle was EU-U.S. Privacy Shield certified, Oracle did not rely on Privacy Shield as a transfer mechanism in its standard services contracts with customers and partners. Instead, Oracle has and continues to rely on appropriate data transfer safeguards such as its Binding Corporate Rules for Processors (BCR-p) and Standard Contractual Clauses, where and as applicable to transfers of EU/EEA, Swiss and UK personal information."*
- **Transfers to Alchemer;** In transferring data from the EU to the Alchemer infrastructure in the United States, we rely on the Appropriate Safeguard of Standard Contractual Clauses. Triple P UK has entered into a Data Processing Addendum with Alchemer, which includes the Standard Contractual Clauses approved by the EU Commission.

- **Transfers to Hong Kong;** TPG maintains a private warehouse in Hong Kong for the storage of materials. Warehouse personnel are authorised to access limited personal data stored on the Oracle (NetSuite) database, when processing an order for the supply of materials. The authority is limited to accessing delivery information.

HOW WE SHARE PRACTITIONERS' INFORMATION

The information we collect from the practitioners who attend Triple P events, will always remain confidential. We will not sell, rent or license that information.

Within TPG

The personal data may be shared within TPG, provided we have a lawful basis to do so. The lawful basis will be for the performance of a contract with the practitioner (in delivering the Triple P event to them), the practitioner's consent or our legitimate business interests. Please note that the personal data collected from practitioners during the Triple P event will only be accessed and or used by TPUK personnel or TPI personnel (as Triple P UK has outsourced various business functions to TPI) who require access to the data for the performance of their role and have appropriate authorisation. All personnel within TPG have undertaken training on the data protection requirements in Europe under the GDPR.

In the limited circumstances where the personal data collected is shared within TPG, TPG will not sell, rent or license that information.

The personal data may be shared outside of TPG in limited circumstances, where there is a lawful basis to do so. The lawful basis will be either the practitioner's consent or our legitimate business interests.

The University of Queensland

Some of the practitioner data may, for example, be shared with the University of Queensland's Parenting and Family Support Centre ("UQ"), who are the creators of Triple P. As the disseminators of Triple P globally, Triple P UK and its related bodies corporate have a legitimate business interest to share limited data with UQ.

An example of a situation where we would share personal data with the University, is if they wished to confirm whether a particular practitioner is Triple P accredited. As the creator of Triple P, UQ has a legitimate business interest in knowing which practitioners are trained and/or accredited to deliver Triple P. Please note that, where de-identified information is sufficient, the data shared with UQ will be in de-identified form.

Agencies

Practitioners may purchase training or accreditation courses themselves (referred to as Open Enrolment Training/Accreditation) or practitioners may be given access to our training/accreditation courses through an agency, where the course is paid for by the agency (referred to as Agency Training/Accreditation). Examples of agencies who may seek to deliver access to Triple P Events include government departments, healthcare providers or charities. Where a practitioner attends Agency Training/Accreditation, some personal data of the practitioner will be shared with the agency, usually via a report(s) on the Triple P Event. There may be some instances where an agency will pay for practitioners to attend Open Enrolment Training or Accreditation, rather than organising separate Agency Training/Accreditation. In these circumstances the agency may receive the report(s) on the Triple P Event, however the report will only include the personal data of those practitioners whose attendance was paid for by the agency. The report(s) will not contain the

personal data of other practitioners who attended the Open Enrolment Event.

For Agency Training, the following information may be shared with the agency:

1. The name of the practitioners;
2. Information regarding their attendance; and
3. Feedback on the practitioner's behaviour. For example, if a practitioner was disruptive this may be reported back to the agency.

For Agency Accreditation, the following information may be shared with the agency:

1. The name of the practitioners;
2. Information regarding their attendance;
3. Feedback on the practitioner's behaviour. For example, if a practitioner was disruptive this may be reported back to the agency;
4. Whether or not the practitioner passed the quiz (a pass is necessary to achieve accreditation);
5. Whether or not the practitioner passed the competency assessment (a pass is necessary to achieve accreditation);
6. Whether or not the practitioner achieved accreditation; and
7. The date their accreditation certificate was issued.

The report(s) will also include summaries of the practitioner responses to the Parent Consultation Skills Checklists, however that information will be in de-identified form and as such is not personal data.

Triple P UK and its related bodies corporate have a legitimate interest to share limited practitioner personal data with agencies, where the agency purchased the Triple P Training and/or Accreditation for the practitioner(s). The agency also has a legitimate interest in knowing if the practitioner is trained and/or accredited to deliver Triple P, as well as whether the practitioner attended the course and how they behaved.

The agency will be an independent controller of the personal data shared with them. As such they will make their own decisions regarding how they will use that data. They will be subject to all of the obligations placed on data controllers under applicable data protection laws. This includes the requirement that they provide data subjects with a Privacy Notice that identifies how they intend to process that personal data, including if they intend to share the data with any third parties. Practitioners should consult the agency's Privacy Notice for information regarding how they will use the practitioner's data, and if the practitioners are not provided with a Privacy Notice by the agency, they may wish to contact the agency's Data Protection Officer.

Third-Party Service Providers

We may provide a practitioner's personal data to our trusted third-party service providers and subcontractors, which they will process for the purposes of completing tasks and providing services to the practitioners, on our behalf. When we use third-party service providers, we disclose only the personal information that is necessary for them to deliver the service. We will not release any personal data to a third party who we are concerned does not have appropriate data protection and privacy practices in place. Further, where we release personal data to a third-party service provider and/or subcontractor, they will not be permitted to use the data for their own purposes, unless the particular data subject (practitioner) has asked us to do so, or we

are required to do so by law. For example, Triple P UK will disclose a practitioner's personal data to a third party, if compelled by a court order.

The third-party service providers with whom we may share personal data include:

- Alchemer, for the purpose of collecting data using electronic resources (online forms);
- Amazon & Oracle NetSuite, for the purpose of the storage of the data;
- IT services providers for the maintenance of the data;
- The Trainer(s) who will run the event.

The information that we may share with the Trainer(s) includes the name of practitioners who are registered for their event, as well as information relating any other Triple P courses those practitioners have previously attended. This information is shared with the Trainer(s), to assist the Trainer(s) in providing the Training event, as they can tailor its delivery to the specific attendees. As described above, Triple P UK will also disclose any additional needs which a practitioner has disclosed, to the Trainer(s), provided the practitioner has provided Triple P UK with their explicit consent to do so. Where this information is disclosed to the Trainer(s), it is done for the purpose of the Trainer(s) accommodating the practitioner's additional needs, if possible, during the Triple P event. We note that the Trainer(s) used by Triple P UK to deliver Triple P events in the UK and/or Ireland, may be TPG employees or independent contractors. They are all trained to deliver Triple P Training events and have all undertaken training on the data protection requirements in Europe under the GDPR and are aware of their data protection and privacy obligations.

- The Head of Training, for the purpose of investigating a complaint. Should a practitioner (or agency) make a complaint about the Triple P event and/or the Trainer(s), information relating to the complaint will be disclosed to the Head of Training, for the purpose of investigating the complaint. The Head of Training is an independent contractor who has fulfilled this role for TPG for several years. In accordance with TPG policies, the Head of Training has undertaken training on the data protection requirements in Europe and would only use a practitioner's personal data for the purpose of investigating and resolving the complaint. Further, we note that should the complaint include special category personal data, for example if a course attendee complained that the Trainer did not accommodate their additional Needs at the Training event, then Triple P UK would seek the practitioner's consent to disclose that special category personal data to the Head of Training.
- Where a practitioner consents to receive electronic communications from Triple P UK, information such as their name, email address and subscription preferences may be shared with Bureau Blanco, the third-party who manages Triple P UK's (and the Triple P Group's) communications function. The limited personal data would only be shared for the purpose of sending relevant/appropriate electronic communications to the practitioner. The practitioner's name and email address may also be shared with Alchemer and/or MailChimp, third party service providers who we occasionally work with to send Triple P communications such as feedback surveys. We note that we will never authorise these third parties to use a practitioner's personal data for the third party's own purposes, including direct marketing purposes.

Other

We may disclose personal data to a third party, including a lawyer, when necessary, to enforce our legal rights or if legally compelled to do so by a court or governmental entity.

HOW LONG WE KEEP THE INFORMATION

As part of Triple P UK's everyday business operations, we collect and store different types of information, including personal data, in various formats and locations. In order to appropriately manage the storage and destruction of this information, Triple P UK maintains a Data Retention Policy. The Policy sets out that information will be retained by Triple P UK for as long as necessary to meet our operational and business needs, and to demonstrate our compliance with legal, regulatory and audit requirements. We note that the DPA and GDPR require personal data to be protected from unauthorised destruction, and contain the data protection principle that '*personal data must be kept for no longer than is necessary for the purpose for which it is processed.*' Accordingly, Triple P UK has assigned appropriate retention periods to records/data it holds, which are set out in our Data Retention Schedule.

Triple P UK may hold the personal data collected from practitioners during the Triple P event process, for as long as is necessary for the relevant processing activity to occur. Further, we are legally required to hold some types of information for certain periods of time (for example the collection of payments). We may retain personal data for longer periods than required by law, if it is in our legitimate business interests and not prohibited by law.

Triple P UK (and the wider Triple P Group) maintain a record of practitioners who are Trained/Accredited to use Triple P in their clinical practice. The record is held for a period of approximately 70 years after the Triple P event/course occurred. The record of practitioners will include the practitioners' names, contact information, qualifications, place of work and aspects of Triple P that they are trained/accredited in. We have an ongoing need and a legitimate business interest to retain a record of all practitioners who have undertaken Triple P training and of those who have achieved accreditation, and to keep that record for a period that will encompass the entire possible duration of their clinical practice, where they may seek to utilise Triple P. Retaining the record of trained/accredited practitioners in the UK and Ireland, enables Triple P UK to provide ongoing support, information and resources to those practitioners, including to maintain their access to the Triple P Provider Network, and to identify anyone that is falsely asserting that they are trained/accredited to provide Triple P.

Where a practitioner consents to receive electronic communication from us, their data will be used for the purpose of sending the promotional emails and will be retained whilst they continue to be subscribed. If the practitioner unsubscribes, they will no longer receive the promotional emails from Triple P UK, however we will retain their completed consent form and unsubscribe request for some time. We need to retain this as we are legally required to maintain records demonstrating that appropriate consent was obtained, where we rely on consent as the lawful basis for our processing personal data.

If you would like more detailed information about how long we will retain your personal data, please consult the Data Retention Schedule which is available on our website or contact our Data Protection Officer at dpo@triplep.net.

PEOPLE'S RIGHTS REGARDING THEIR PERSONAL DATA

People whose data is collected and processed by Triple P UK ("data subjects"), such as the practitioners who attend Triple P Training/Accreditation, are entitled to certain information and have various rights under the GDPR, including the right to:

- Access their information;
- Rectification (to ask us to amend or update their personal data if it is incomplete or inaccurate);
- Erasure;
- Restrict the processing of all or some of their information (in certain circumstances);
- Object to our processing their personal data (in certain circumstances);
- Data portability;
- Not be subjected to automated decision making; and
- Withdraw their consent.

For more information about the rights of data subjects under the GDPR, please contact our Data Protection Officer.

Data subjects also have a right to complain about us to a relevant supervisory authority. We ask that anyone who has a complaint about our use of their personal data, first bring the complaint to our attention by submitting it to the Data Protection Officer, so that we have the opportunity to address their concerns.

Should a data subject wish to contact the supervisory authority:

- If they are in the UK, they should contact the UK's Information Commissioner's Office via their website at <https://ico.org.uk/make-a-complaint/your-personal-information-concerns/> or write to them at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, United Kingdom, SK9 5AF.
- If they are in the Republic of Ireland, they should contact the Data Protection Commission using a form available on their website at <https://www.dataprotection.ie/docs/complaints/1716.htm>. The Data Protection Commission asks that the form then be emailed to info@dataprotection.ie. Alternatively, they can write to the Data Protection Commission at Data Protection Commission, Canal House, Station Road, Portarlinton, Co. Laois, Ireland, R32 AP23

UPDATES

This version of the Privacy Notice, updates and supersedes any prior version. The "Effective From" section on the title page lists when this Privacy Notice was last revised. We may update this Privacy Notice at any time. Any changes to the Privacy Notice will become effective when it is published on the provider network and online registration pages of our website and updated on our registration emails.

ANY QUESTIONS

Please direct any questions about our use of personal data to our Data Protection Officer by email at dpo@triplep.net (preferred) or using TPUK's postal address, which is provided above.