

## Privacy Policy for The International Transactional Analysis Association

### 1. BACKGROUND

This document describes how the International Transactional Analysis Association, a California tax-exempt nonprofit public benefit corporation (ITAA) collects, uses and protects personally identifiable information of its Members as described in Section 3 below (membership information). The ITAA processes Member Information for the following purposes:

- To provide you with ITAA membership services;
- To provide you with information you have requested;
- To notify you of upcoming ITAA events, seminars elections, and conferences;
- To provide you with ITAA publications and printed materials to which you have subscribed.

We will not sell or otherwise share Member information with any third parties, including partners, advertisers or third-party service providers, except as described in this policy to provide the above-referenced services, or as compelled by law. We do not sell or rent Member Information to third parties of any kind for any reason. Neither do we use Member Information for our promotional use or direct marketing efforts.

Although the ITAA is a California nonprofit corporation, some of its Members reside in Europe in jurisdictions subject to the EU General Data Protection Regulation (GDPR), which imposes privacy obligations with respect to their Member Information. The ITAA takes its Members' privacy and data protection seriously. This Privacy Policy is intended to apply to all ITAA Members in all aspects of the ITAA's operation.

### 2. HOW ITAA COLLECTS YOUR INFORMATION

When you apply for ITAA membership, renew your ITAA membership, subscribe to an ITAA publication, participate in ITAA sponsored programs or events, or make a charitable donation to the organization, the ITAA will request personal information necessary to provide you with the benefits of membership. As a condition of conducting electronic or digital communications with its members, the ITAA requires each member to give a written consent to electronic communications, the form of which can be found, among other places, on “**News and Announcements Section**” of the introductory page of the ITAA website at <https://www.itaaworld.org> , and on the Governance Documents section of the “**About the ITAA**” page of the ITAA website at <https://www.itaaworld.org/itaa-governance-documents> .

#### ITAA Membership

An applicant must download an application form, a PDF , from the ITAA website [www.itaaworld.org](http://www.itaaworld.org) and enter requested certain information described in Section 3, below. The applicant may password-protect the completed document for secure return to the ITAA via email. After the protected application is transmitted to the ITAA, the applicant can send the password separately to the ITAA via email. The ITAA does not retain the email transmitting the password or the password.

A Member may renew their membership by logging into the ITAA website members-only area to submit renewal information and pay dues. The connection to the ITAA members-only area is encrypted and secure.

Member Information concerning membership and renewal is entered into the ITAA Customer Relationship Management system (CRM). The ITAA uses CiviRM open source software, which is hosted in its server located in Boston, Massachusetts by a third-party hosting company, CivicHosting. No credit card information is stored in that server. We are advised that the server is GDPR compliant.

Received membership applications are printed and stored in files located in a secure file cabinet maintained and accessed by CFO, Kenneth C. Fogleman, at ITAA, 5932 Corte Cerritos, Pleasanton, CA 94566-5880 United States of America.

Mailed applications are delivered to the ITAA corporate offices in Pleasanton, California. Member Information applications is entered into the ITAA CRM. The paper forms are stored in files a secure file cabinet maintained and accessed by CFO, Kenneth C. Fogleman, at ITAA, 5932 Corte Cerritos, Pleasanton, CA 94566-5880 United States of America.

The ITAA stores paper application forms, which include the payment method and payment information, in its corporate offices in Pleasanton, California. We do not retain any payment or credit card information in electronic/digital form; there is currently no "auto-renew" function on the ITAA website.

Paper membership records are retained for ten years for tax and accounting purposes, then securely shredded.

The ITAA also stores electronic/digital Member Information on a password-protected computer in a locked office located in its corporate offices; the computer is connected to the internet. Access to the computer is secured with a password and uses a firewall and security software that is updated regularly.

### Email Subscribers

The ITAA maintains an email mailing list which is used to notify Members of upcoming events, transmit membership information and forms, and to transmit the ITAA newsletter, *The Script* and a link to the *Transactional Analysis Journal* (TAJ). Members are subscribed after successful (paid) membership application or renewal. All email addresses are held securely in a password-protected platform maintained in a server in the corporate offices; they are not sold or transferred to third parties except as described in this policy. Member passwords to the members-only section of the ITAA website are [are not] kept on the ITAA's server or in its system.

### Accounts

The ITAA maintains financial information in an online version of QuickBooks that resides on a server hosted by its publisher, Intuit<sup>1</sup>. The host adheres to standards equivalent to that required by GDPR. Financial information may include membership dues payment information, events/conference fee payment information, donation information, *Script* ads, reprints and book sales information. CFO,

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<sup>1</sup> Intuit's privacy policy is found here:

[https://security.intuit.com/index.php/privacy?\\_gl=1\\*110tcbe\\*\\_gcl\\_aw\\*R0NMLjE1NzA4MTc3MTQuRUFJYUIRb2JDaE1JZzVfc0tZVU1UUlWZHIDdEJoM2tuUUluRUFBUFTQUFFZ0I5QV9EX0J3RQ..\\*\\_gcl\\_dc\\*R0NMLjE1NzA4MTc3MTQuRUFJYUIRb2JDaE1JZzVfc0tZVU1UUlWZHIDdEJoM2tuUUluRUFBUFTQUFFZ0I5QV9EX0J3RQ](https://security.intuit.com/index.php/privacy?_gl=1*110tcbe*_gcl_aw*R0NMLjE1NzA4MTc3MTQuRUFJYUIRb2JDaE1JZzVfc0tZVU1UUlWZHIDdEJoM2tuUUluRUFBUFTQUFFZ0I5QV9EX0J3RQ..*_gcl_dc*R0NMLjE1NzA4MTc3MTQuRUFJYUIRb2JDaE1JZzVfc0tZVU1UUlWZHIDdEJoM2tuUUluRUFBUFTQUFFZ0I5QV9EX0J3RQ)

Kenneth C. Fogleman, has the password for and access to the ITAA's QuickBooks account. Other members of the Board of Trustees may have "read only" access to the ITAA's QuickBooks account.

### 3. THE TYPE OF INFORMATION ITAA COLLECTS FROM MEMBERS

- Name
- Postal Address
- Credit Card Billing Address
- Telephone Number
- Email Address
- TA Certifications, if any
- Field of practice if credentialed
- Professional Association Memberships
- Details of Complaints
- Name of Training Organization, if applicable
- Qualifications (other non-TA qualifications, licenses and credentials)
- Type of Membership
- Additional Subscription information [for example, subscription to *TAJ*]
- Nationality, preferred medium of supervision and number of supervised hours of practice for IBOC registry purposes (see Section 4.e. below)
- Membership status (active, suspended, lapsed, cancelled)

### 4. HOW THE ITAA USES YOUR INFORMATION

We use the Member Information to register and renew memberships; provide membership benefits, announcements, newsletters, election information; deliver subscribed publications; administer ITAA rules and bylaws; confirm membership status in response to certification exam procedures; poll members on various issues of interest; and also to grant access to the ITAA website "members-only" section.

### 5. WHO ITAA SHARE YOUR INFORMATION WITH

- Membership**. The ITAA shares appropriate Membership Information internally within the ITAA management and financial personnel to perform its functions described above. We do not transfer it to third parties except as described in this privacy policy.
- Various Projects**. Additionally, the ITAA conduct various projects and surveys from time to time and coordinates with the IBOC (*see below*) using membership information utilizing Google Forms, an online service provided to project coordinators and the BOT<sup>2</sup>. We are advised that the servers hosting Google Forms are GDPR Compliant.
- Dropbox**. Monthly reports of membership status and a list of active members is created by Janet Chinn, Office Administrator, and stored to an online Dropbox folder established by the ITAA for the purpose of providing monthly management reports to the Board of Trustees of the ITAA. Dropbox is an online cloud-based document storage facility<sup>3</sup>. Further, sensitive documents, such as confidential board packets, resolutions, and awards nominations are stored on the ITAA Dropbox account. Access is granted only by invitation to join a specific folder. The Secretary of

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<sup>2</sup> Google's privacy policy can be found here: <https://policies.google.com/privacy?hl=en>

<sup>3</sup> The Dropbox privacy policy can be found here: <https://www.dropbox.com/privacy>

ITAA manages access to it. Only members of the Board of Trustees, the Chief Financial Officer, and the managing editor of the *Script* and *Transactional Analysis Journal* are invited to access files in the ITAA Dropbox folder. We are advised that the servers hosting Dropbox account are GDPR compliant.

d. **Taylor & Francis Group (Routledge)**. A third-party publishing company located in the U.K. publishes the online version of *Transactional Analysis Journal* (TAJ) to ITAA members and selected institutional pursuant to a contract with the ITAA<sup>4</sup>. Taylor&Francis uses ITAA membership information to provide online access to ITAA . Their data processing is handled by Amazon Web Services (AWS) in Ireland<sup>5</sup>. To view the current and past editions of TAJ, Members and subscribers are required to register and create login credentials at <https://www.tandfonline.com>. The ITAA provides Taylor & Francis with ITAA membership information consisting of the member's full name, ITAA membership ID and email address. The ITAA will also transmit to the publisher the type of membership type, which determines which version of the TAJ is accessible. The membership list is updated quarterly. Also, the ITAA transmits a list of members to Taylor & Francis annually with posting information so the publisher can distribute printed copies to members who so request, and to purge lapsed memberships. The annual list contains the member's full name, mailing address, telephone number, and email address.

e. **International Board of Certification**. IBOC is a separate California limited liability company that is a subsidiary of the ITAA. It is organized as a registry of candidates seeking to qualify for and take Transactional Analysis certification exams. Applicants must be Members of the ITAA. Supervisors, and volunteer examination officials are also ITAA Members. Accordingly, the information collected by IBOC includes Member Information and information related to each candidate concerning their qualifications, training, supervised hours, and supervision (collectively, "Candidate Information"). It also includes information about a candidate's contracted supervisor, the supervisor's Member Information and the supervisor's comments/feedback concerning the Candidate's status ("Supervisor Information"). Candidate Information and Supervisor Information are received by IBOC via email ([iboc@itaaworld.org](mailto:iboc@itaaworld.org)) and stored on a computer/server maintained and accessed by the IBOC's administrator; the information is backed up on a cloud service, Carbonite, and shared to the IBOC team via Dropbox.

## 6. RETENTION

Digital Member Information will be retained for a period of seven years after membership ceases. In the eighth year after membership ceases, all digital forms of Member Information stored by the ITAA will be destroyed.

Paper records of Member Information will be retained for a period of 10 years from their creation; after 10 years, all paper forms of a Member's Member Information stored by the ITAA will be destroyed.

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<sup>4</sup> The Taylor & Francis privacy policy can be found here: <https://taylorandfrancis.com/customer-privacy>

<sup>5</sup> Located in the EU, AWS follows the GDPR. See their privacy policy here: <https://aws.amazon.com/privacy>

## 7. HOW YOU CAN ACCESS YOUR MEMBER INFORMATION

You can email [admin@itaaworld.org](mailto:admin@itaaworld.org) requesting a document containing all your information stored by the ITAA in a machine-readable format.

## 8. YOUR RIGHTS

You have the right to:

- Request details of all your personal information stored on the ITAA server in a machine-readable format
- Request changes to incorrect or incomplete data
- Object to the processing of your personal information
- Restrict the processing of your personal information
- Withdraw consent for ITAA to store or process your personal information
- Request deletion of all your personal information stored by ITAA and/or IBOC
- Lodge a complaint with the ITAA Board of Trustees c/o [admin@itaaworld.org](mailto:admin@itaaworld.org) **or** in writing to the ITAA c/o Kenneth Fogleman, CFO, 5932 Corte Cerritos, Pleasanton, CA 94566-5880 United States of America.

If you wish to complain about how ITAA handles your data, in the first instance please email [admin@itaaworld.org](mailto:admin@itaaworld.org) to communicate your complaint.

If your complaint cannot be resolved, please email

- [deepak.dhananjaya@gmail.com](mailto:deepak.dhananjaya@gmail.com), VP-Development (2019-2020) – if it concerns membership accounts.
- [thorsten.geck@gmail.com](mailto:thorsten.geck@gmail.com), VP – Professional Standards (2018-2021) – if it concerns IBOC matters.

If your personal information was collected from you while residing or located in an EU member state, and you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

All subscribers to the ITAA email list have the opportunity to opt out at any time.

## 9. USE OF COOKIES

ITAA uses cookies and similar technologies on the ITAA website. Cookies are small text files that may be stored on your computer or mobile device when you visit our website [itaaworld.org](http://itaaworld.org) . Cookies do many different things, including:

- Recognizing you when you sign in use our offerings. This allows us to provide you with recommendations, display personalized content, and provide other customized features and services.

- Keeping track of your specified preferences. This allows us to honor your likes and dislikes, such as your language and configuration preferences.
- Conducting research and diagnostics to improve our offerings.
- Preventing fraudulent activity.
- Improving security.
- Delivering content, including ads, relevant to your interests on AWS sites and third-party sites (see the Interest-Based Ads notice for how we use cookies in serving interest-based ads).
- Reporting. This allows us to measure and analyze the performance of our offerings.

Approved third parties may also set cookies when you interact with our offerings. Third parties include search engines, providers of measurement and analytics services, social media networks, and advertising companies. Third parties use cookies in the process of delivering content, including ads relevant to your interests, to measure the effectiveness of their ads, and to perform other services on behalf of the ITAA.

You can manage browser cookies through your browser settings. The 'Help' feature on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, how to disable cookies, and when cookies will expire. If you disable all cookies on your browser, neither we nor third parties will transfer cookies to your browser. If you do this, however, you may have to manually adjust some preferences every time you visit a site and some features and services may not work.

## **10. LINKS**

The ITAA website contains links to other external websites. Please be aware that ITAA is not responsible for the privacy practices of such other sites. The ITAA encourages you to be aware of this when you leave the ITAA site and to read the privacy statements of each and every website that collects personally identifiable information. This privacy statement applies solely to personally identifiable information collected by the ITAA.

## **11. HOW ITAA WILL TELL YOU ABOUT FUTURE CHANGES TO THIS PRIVACY NOTICE**

Any changes made to the privacy policy will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any changes to the privacy policy.

## **12. HOW TO CONTACT THE ITAA**

If you have any questions or concerns about our use of your personal information please contact us as:

By email: [admin@itaaworld.org](mailto:admin@itaaworld.org).

By mail/post: Kenneth C. Fogleman, CFO, International Transactional Analysis Association, 5932 Corte  
Cerritos, Pleasanton, California 94566-5880, United States of America

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