

# HFEA website and social media user guidelines

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## This policy contains:

1. Website and social media privacy information.
  2. Information we collect through automated systems when you visit our website (e.g. cookies).
  3. Terms and conditions of using our website, patient feedback tools and social media.
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## 1. Background

- 1.1.** It is the policy of the Human Fertilisation and Embryology Authority (HFEA) that personal information, such as your name, mailing address, email address or personal telephone number is private and confidential. By using the HFEA website, you consent to the terms of our privacy policy for the collection, use and disclosure of your personal information for the purposes set out below. We do not collect, use or disclose your personal information for any purposes other than those identified below, except with your consent or as required by law.
- 1.2.** This policy tells you how we use information that we may record about you when you use our website. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers information that could identify you (“personal information”). In the context of the law and this notice, “process” means collect, store, transfer, use or otherwise act on information.
- 1.3.** It also includes the terms and conditions of using our website or social media.
- 1.4.** To use our website, you need to agree to the terms of our privacy policy.
- 1.5.** We take your privacy and confidentiality seriously. The personal data of visitors to our website and social media channels will not be used for any purpose unintended by them and will be protected from any third parties. We undertake to preserve the confidentiality of all information you provide to us.
- 1.6.** Our policy complies with all current UK data protection laws accordingly implemented, including those required by the EU General Data Protection Regulation (GDPR).
- 1.7.** The law requires us to tell you about your rights and our obligations to you in regard to the processing and control of your personal data.
- 1.8.** We do not trade personal data for commercial purposes, and will only disclose it if required by law or if we have another legal basis to do so, as set out below.

# Privacy Information

## Information we process with your consent

- 1.9.** Except where you have consented to our use of your information for a specific purpose, we do not use your information in any way that would identify you personally. We may aggregate it in a general way, for example to monitor the performance of a particular page on our website

## Information we process for the purposes of legitimate interests

- 1.10.** We may process information on the basis there is a legitimate interest, either to you or to us, of doing so.

- 1.11.** Where we process your information on this basis, we do so after giving careful consideration to:

- whether the same objective could be achieved through other means
- whether processing (or not processing) might cause you harm
- whether you would expect us to process your data, and whether you would, in the round, consider it reasonable to do so.

- 1.12.** For example, we may process your data on this basis for the purposes of:

- responding to communication from you to which we believe you would expect a response
- protecting and asserting the legal rights of any party
- protecting your interests where we believe we have a duty to do so.

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## 2. Specific uses of information we may hold

- 2.1.** We have detailed below a number of specific instances in which we may collect and use your personal information.

- 2.2.** Our social media sites and the blog on our website allow you to post information with a view to that information being read, copied, downloaded, or used by other people.

- 2.3.** Examples include:

- posting a message our social media
- tagging an image
- clicking on an icon next to another visitor's message to convey your agreement, disagreement or thanks
- commenting on a blog post.

- 2.4.** We do not specifically use this information except to allow it to be displayed or shared. We do store any information posted on our social media sites and comments posted on our blog.

- 2.5.** Once your information enters the public domain, we have no control over what any individual third party may do with it. We accept no responsibility for their actions at any time.

- 2.6.** Provided your request is reasonable and there is no legal basis for us to retain it, then at our discretion we may agree to your request to delete personal information that you have posted. You can make a request by contacting us at [enquiriesteam@hfea.gov.uk](mailto:enquiriesteam@hfea.gov.uk).

- 2.7.** If you subscribe to our mailing list for Clinic Focus via our Communications Team ([communications@hfea.gov.uk](mailto:communications@hfea.gov.uk)), you will be automatically subscribed to receive email updates. You will only receive information that you have opted in to receive. Depending on the lists you

have opted in to, we may contact you regarding: research updates, opportunities to take part in research, campaigns and events.

- 2.8.** We will give you the option to disclose any information you are comfortable with when you register. This is important so that we can send you the most relevant information. You can choose to not tell us this information if you wish.
- 2.9.** We transfer all contacts to the Wired database, which is UK hosted. This system is kept updated with your marketing preferences.

## Responding to online surveys

- 2.10.** If you take part in a survey run by the HFEA you will use an online service called Survey Monkey. It holds data in the UK and is signed up to the EU-US Privacy Shield. They will not share survey data with any third parties.
- 2.11.** If you prefer to submit responses to these surveys in another format, please contact the Communications Team at [communications@hfea.gov.uk](mailto:communications@hfea.gov.uk).
- 2.12.** We will only contact you if you have expressed consent to do so in a previous survey or opt-in process.

## Contacting us with a query

- 2.13.** When you contact us, whether by telephone, through our website or by e-mail, we collect the data you have given to us in order to reply with the information you need.
- 2.14.** We record your request and our response to increase the efficiency of our organisation.
- 2.15.** We keep personally identifiable information associated with your message, such as your name and email address so we are able to track our communications with you to provide a high-quality service. We process and retain this information in line with our privacy policy.

## Facebook users

- 2.16.** Facebook is a valuable tool for us and for the community we serve, which is why we use the platform. Facebook however is a commercial company. We want to remind our users that information that shared on timelines, on our page or in private messages may be used or sold by Facebook for commercial purposes.

## Event attendees

- 2.17.** When you attend an HFEA event, we will need your name, email address and in some cases your payment information. We will use this information solely for the purpose of administering the event. We delete event attendance data at the end of every year. We use Eventbrite to manage event registrations. They may contact you about other events that may be of interest to you, but only if you opt in when you register with them. Read Eventbrite's [privacy policy](#).

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## 3. Keeping your information secure

- 3.1.** Any personal information used and processed for the purposes of maintaining our relationship with you (where clearly agreed) will be treated in a confidential manner. The HFEA is committed to keep it for no longer than necessary, and to delete it securely in order to comply with data protection laws. It will be kept up to date, relevant and not shared with any other organisations unless there is a clear basis to do so. Any personal information will be used for the purpose it was collected unless otherwise specified. We will only process information fairly and where we have a legal basis to do so. We are transparent in how, why, where and for what purpose this minimum amount of information is processed by us. The HFEA is committed to the information security

principles of confidentiality, availability and integrity, and appropriate organisational and technical measures for information management (including information transfers).

- 3.2.** However, while we will use all reasonable efforts to secure your data, in using our site you acknowledge that the use of internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data transferred from you, or to you, via the internet. If you have specific concerns about your information, please contact us using the details below.

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## 4. Use of Information we collect through automated systems when you visit our website

- 4.1.** In order to use certain areas of our website you may need to have cookies enabled in your web browser. When visiting our website, you will be given an option to choose whether you agree to us using cookies in your web browser. This is possible by opening the Cookies Consent pop-up box and actively submitting your preferences. Whether you agree or not to the HFEA's use of cookies, your visit to our website is unaffected.
- 4.2.** When you visit our website, we collect standard logging information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the HFEA's website. We collect this information in a way which does not identify anyone. We do not make any attempt to find out the identities of those visiting our website.
- 4.3.** We use Google Analytics (GA) to help analyse use of our website. This analytical tool uses 'cookies', which are text files placed on your computer, to collect standard internet log information and visitor behaviour information in an anonymous form. The information generated by the cookie about your use of the website (including your IP address) is transmitted to Google. This information is then used to evaluate visitors' use of the website and to compile statistical reports on website activity for the HFEA.
- 4.4.** If we do want to collect personally identifiable information through our website, we will be upfront about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

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## 5. Our use of cookies

### Why and how the HFEA use cookies

- 5.1.** The cookies used by the HFEA cannot be used to identify you personally. The cookies used on [www.hfea.gov.uk](http://www.hfea.gov.uk) are only used for analytical and accessibility purposes.
- 5.2.** Our analytic cookies are used to gauge the number of people who come to our site, and see what pages are viewed the most. This data helps us understand how visitors use the site and how we can improve the user experience. Other cookies on the site are for accessibility purposes for example, if a user increases the font size of the text on the website, then a cookie is used to remember their selection for the duration of their visit.
- 5.3.** We do not use cookies for marketing purposes, or to gather personal user information in any way. We do not make any attempt to find out the identities of those visiting our website.

### Cookies used on this website

- 5.4.** [The list of active cookies](#) we use on our website is regularly updated.

## Consenting to our use of cookies

- 5.5.** We want to be as open and transparent on cookies use as possible and we give you an option to choose whether you agree with the cookies to be used by the HFEA. You should be able to see Cookies Consent box when you visit our website, so follow the links to decide on whether you agree with HFEA to use them or not. Please note, that we can only act on a clear action from yourself, therefore if you don't mind the cookies being used, please tick / slide the button to clearly express that. Otherwise we will think that you don't want us to use cookies when it comes to your use of the HFEA website.

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## 6. Our use of Google Analytics

- 6.1.** We use Google Analytics (GA) to establish site user interaction. We have GA code installed on our site which creates one or more text files on your computer (called a "cookie"). The cookies contain an ID number which is used to uniquely identify your browser and track each site you visit that has GA enabled.
- 6.2.** We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you. With this information we can continually improve the information that we provide on our site and the processes for actions such as contacting us. We can also use it to increase the number of new people finding our site.
- 6.3.** If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to our website.
- 6.4.** Google Analytics stores the following data:
- time of visit, pages visited, and time spent on each page of the webpages
  - interactions with site-specific widgets
  - referring site details (such as the URL a user came through to arrive at this site)
  - type of web browser
  - type of operating system (OS)
  - flash version, JavaScript support, screen resolution, and screen color processing ability
  - network location and IP address
  - document downloads
  - clicks on links leading to external websites
  - errors when users fill out forms
  - clicks on videos
  - scroll depth.
- 6.5.** Google also collects information about you from its Doubleclick tracking and profiling service, from ad-supported apps on your Android or iOS device, from your YouTube and Gmail activity and from your Google account. This data is put together and used to make inferences about your age, gender, interests, hobbies, shopping habits and living circumstances. If you already have GA cookies, they will be updated with the latest information about your visit to the site.
- 6.6.** As we cannot access any personal data about you ourselves, we are not the Data Controller for your Google Analytics or Doubleclick profile data. You would need to contact Google directly for this information. If you would like more detail about the methods used however, please get in touch with the Communications Team.
- 6.7.** You have the right to object to this tracking and to stop it happening. To prevent being tracked by Google Analytics:
- Use a tracking-blocker, such as Privacy Badger
  - Clear cookies after every browsing session
  - Install the Google Analytics opt-out extension

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## 7. Copyright

- 7.1.** Images, text, software, documentation, electronic text and image files, audio and video files and clips and other materials on the HFEA website are protected by copyright laws and may be covered by other restrictions as well. The HFEA retains all rights, including copyright, in data, image, text and any other information contained in these files. The HFEA expressly prohibits the copying of any protected materials on this website, except for the purposes of fair use as defined in copyright laws and as defined below.
- 7.2.** Fair use of copyrighted material includes the use of protected materials for non-commercial educational purposes, such as teaching, scholarship, research, commentary and news reporting. Unless otherwise noted, users who wish to download or print text, audio, video, image and other files from the HFEA website for such uses are welcome to do so with our express permission. Users must cite the author and source of this material as they would material from any printed work; the citation should include the web address or URL <https://www.hfea.gov.uk/>. By downloading, printing, or otherwise using text, audio, video, image and other files from this website, whether accessed directly from this website or via other sites or mechanisms, users agree that they will limit their use of such files to fair use and will not violate the HFEA's or any other party's proprietary rights.
- 7.3.** Unauthorised publication or exploitation of the HFEA's files is specifically prohibited. Anyone wishing to use any of these files or images for commercial use, publication, or any purpose other than fair use as defined by law, must request and receive prior permission from the HFEA.

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## 8. Links to other websites

- 8.1.** The HFEA's website may occasionally link to other sites that may be of interest to our users. We are not responsible for the accuracy or reliability of the content on third-party websites, nor do we necessarily endorse the sites and their content.
- 8.2.** If you would like your website to be considered for linking on the HFEA website, please contact us at [communications@hfea.gov.uk](mailto:communications@hfea.gov.uk). We are under no obligation to provide reciprocal links and reserve the right to be selective in our linking practices.

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## 9. Disclaimer

- 9.1.** The HFEA does not provide medical advice to individuals. The content of this website is intended for information purposes only and is not meant to serve as a substitute for professional medical advice, diagnosis or treatment.
- 9.2.** The HFEA makes all reasonable efforts to ensure that information on this website is accurate and up to date. However, the HFEA makes no representations or warranties of any kind, express or implied, as to the accuracy, completeness, suitability or reliability of any of the information or data contained in or omitted from this website, or for any action or inaction made in reliance thereon.
- 9.3.** The HFEA will not be liable (save for death or personal injury resulting from its own negligence) for any false, inaccurate, inappropriate or incomplete data or information published on this

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## 10. Accessibility

- 10.1.** If you use a screen reader or other accessibility tools and are having difficulties with any of our documents, you can request them in an accessible format.
- 10.2.** Simply email us at [communications@hfea.gov.uk](mailto:communications@hfea.gov.uk) to tell us which files you would like to access.
- 10.3.** We cannot guarantee that apps and plugins from third parties will conform to this site's accessibility standards.

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## 11. Patient feedback terms and conditions

- 11.1.** We (the HFEA) encourage patients, partners and donors to give feedback about the fertility clinic they use. We then publish some of this information on Choose a Fertility Clinic, along with an inspection rating and birth statistics to help others see whether a clinic is right for them.
- 11.2.** The Patient feedback terms and conditions contain important information about our legal position, copyright matters and your responsibilities while using the patient feedback tool. These terms are in addition to our standard website terms of use and privacy detailed above.
- 11.3.** We reserve the right to change any part of these agreements without notice and your use of this website and feedback tool will be deemed as acceptance of this agreement. We ask that you read them carefully and check back regularly as they are subject to change.
- 11.4.** By visiting the patient feedback tools and contributing to them, you agree to be legally bound by these patient feedback terms and conditions. If you do not wish to agree to these terms and conditions, then please do not use the patient feedback tool or make any contributions.

### Misrepresentation by clinics

- 11.5.** Clinic staff should never provide feedback on their own clinic or other clinics. It is an offence under the Consumer Protection from Unfair Trading Regulations 2008 for businesses to falsely represent themselves as consumers.
- 11.6.** The Consumer Protection from Unfair Trading Regulations 2008 prohibit unfair commercial practices. Submitting fake online reviews satisfies the definition of unfair commercial practice because it contravenes good professional practice and it is likely to distort the economic behaviour of the average consumer.
- 11.7.** Inspectors will review the responses received and will follow up on any unexplained or unusual activity.
- 11.8.** Prosecution for breaches of the Unfair Trading Regulations can be brought by the Office of Fair Trading (OFT) and by the Trading Standards.

### Misrepresentation by members of the public

- 11.9.** All ratings and comments provided must be truthful and honestly held beliefs or opinions.
- 11.10.** We reserve the right to remove ratings that we believe are misrepresentative, including multiple submissions from the same person.

### Giving your feedback

Whilst you can provide negative comments you should not use the feedback tool to make a complaint about a clinic. Complaints should be dealt with under the complaints process as described on this page of our website [here](#).

- 11.11.** Comments submitted should relate to your personal experience or that of someone close to you. If you want to comment on someone else's experience, (e.g. a relative or someone you care for) then you may do so if you ensure that you are not named in the posting and you state how the other person is connected to you (e.g. 'my partner'). You warrant that all statements of fact in any comment you submit are true, and that any expression of opinion is your honestly held opinion on those facts, or that of the person on whose behalf you are writing.
- 11.12.** You should provide a rating only once per course of treatment. Responses will be monitored for repeat submissions and we reserve the right to remove additional submissions if necessary.

## Use of ratings and feedback

- 11.13.** We use the ratings that are provided through the tool to generate overall question ratings and a patient rating. This is based on the average rating of the first four survey questions for the last year but not the cost question. The number of ratings used to generate the average is shown.
- 11.14.** We only use ratings over a rolling 12-month period. After 12 months, ratings are no longer counted towards the patient rating or question ratings.
- 11.15.** Each question has five options. Each answer (apart from the cost question) is given a numerical value from 1-5, with one being the worst answer and five the best. These values are then added for all responses in the last 12 months and an average is generated.
- 11.16.** These ratings should not be solely relied upon to decide upon which clinic to use. These may help patients or donors to get a sense of what others think of various clinics, but the ratings may not be representative of the views of all clinic users. We therefore disclaim all liability and responsibility arising from any reliance placed on such ratings by any visitor to our site, or by anyone who may be informed of any of its contents.

## Limitation of liability

- 11.17.** Please see limitation of liability section on the HFEA's main terms of use.

## Action we may take

- 11.18.** We reserve the right to delete any content at any time for any reason and we are under no obligation to publish any contributions. We reserve the right to alter or update the house rules or terms and conditions at any time.

## General

- 11.19.** If any of these terms are determined to be illegal, invalid or otherwise unenforceable then the remaining terms shall remain in full force and effect.
- 11.20.** These terms shall be governed by and interpreted in accordance with the laws of England.

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## 12. Complaints regarding content on our website or social media

- 12.1.** To make a complaint about any of the content on our website or social media sites please contact [communications@hfea.gov.uk](mailto:communications@hfea.gov.uk).
- 12.2.** We will investigate complaints received about any of the content on our website or social media sites.
- 12.3.** If we feel it is justified, or if we believe the law requires us to do so, we shall remove the content while we investigate.
- 12.4.** If we consider your complaint to be vexatious or without any basis, we shall not correspond with you about it.

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## Further Information

### Data Controller

A data controller is a person, organisation or corporate body who (either alone, jointly or in common with other persons) determines the purposes and the manner in which any personal data are processed. The HFEA is the data controller for the personal information we hold about you. Our details are:

The Human Fertilisation and Embryology Authority 10 Spring Gardens

London SW1A 2BU

Telephone No: 020 7291 8200 Website: [www.hfea.gov.uk](http://www.hfea.gov.uk)

The HFEA's ICO registration number is Z7597763.

## **Who should you contact with any concerns?**

If you have any concerns about how we handle your information you have a right to complain by following our complaints policy (link).

If you are not satisfied with how we have handled your complaint, you have a right to complain to the Information Commissioners Office ('ICO') about it.

The Information Commissioner can be contacted at:

Information Commissioner's Office Wycliffe House, Water Lane Wilmslow, SK9 5AF

Telephone: 08456 306060 Website: [www.ico.gov.uk](http://www.ico.gov.uk)

## **Senior Information Risk Owner**

The Senior Information Risk Owner's (SIRO) responsibilities are to lead a culture of good information management, own the overall information risk policy and procedures and advise the Accounting Officer on information risk.

Our SIRO contact:

Richard Sydee

General: 020 7291 8200

Email: [Richard.Sydee@hfea.gov.uk](mailto:Richard.Sydee@hfea.gov.uk)

## **Data Protection Officer**

A data protection officer (DPO) is a role required by current data protection laws for public bodies. Data protection officers are responsible for overseeing data protection strategy and implementation to ensure compliance with GDPR requirements.

Dave Thomson

Email: [david.thomson@hta.gov.uk](mailto:david.thomson@hta.gov.uk)

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## **About this policy**

If you have any questions about this policy or the information we hold about you, please contact us at:

Email: [communications@hfea.gov.uk](mailto:communications@hfea.gov.uk)

Phone: 020 7291 8200

Please see our [Privacy Policy](#) to find out more on how why and when we process your information.

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