

# Privacy Policy

Updated: 21/05/18

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## Introduction

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This Privacy Policy explains in detail how we collect, use, share, and protect your personal information when you interact with us. It will also provide you with a better understanding of your rights relating to your personal data and how you can exercise those rights.

### Who we are?

Holisticure - Holistic Massage & Beauty Therapy is owned by Claudia Adams, a sole trader, of 23 Marham Drive, Kingsway, Gloucester, GL2 2DL. For the purpose of the Data Protection legislation, we are the Data Controller of your personal data. This means that we are responsible for deciding how we use your information.

### Personal information

Personal information is information about you from which you can be identified. Dependent on which service you receive from us, we will process different types of information about you.

## Collection and storage of your data

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### When booking of a treatment

#### What information of mine is collected?

- Your name.
- Your telephone number and/or email address - whichever method you chose to contact us by.
- If you contacted us via the Natural Therapy Pages website form, we will also collect your address.

#### Where is my data collected from?

Whilst booking your first treatment, your data will be collected either over the phone, text or by email.

### Why is my data being collected and how is it used?

We collect your contact data to allow us to respond to your booking requests.

Only clients who are considered existing customers, by receiving treatment, may later be informed of our newly-available treatments or special promotions. Note that, if your booking is not finalised, or you cancel your appointment, we will not attempt to market to you in the future, without requesting your consent.

### How is my data being stored and protected?

Your contact data will be added to Claudia Adams' Google Contacts and Google Calendar, which is phone pattern protected. If you got in touch via email, data within your correspondence will remain in email format.

## **When ordering a gift voucher**

### What information of mine is collected?

- Your name.
- Your telephone number and/or email address - whichever method you chose to contact us by.
- The voucher recipient's name and address, if you request it to be sent by post.

### Where is my data collected from?

When ordering a gift voucher from us, your data will be collected either over the phone, text or by email.

### Why is my data being collected and how is it used?

We sometimes collect your gift voucher recipient's name and address so that we can post the voucher to them.

### How is my data being stored and protected?

Your contact data will be added to Claudia Adams' Google Contacts, which is phone pattern protected. If you got in touch via email, data within your correspondence will remain in email format.

A gift voucher recipient's name and address will be temporarily recorded on a paper-based, gift voucher request form.

## **When receiving a treatment**

### What information of mine is collected?

- Your telephone number, if not already supplied during booking.
- Your age.
- Your medical history and any medication which you may be taking.
- Any physical, emotional or health conditions which you may suffer.
- Any jobs or hobbies which you may participate in.

### Where is your data collected from?

During your first consultation, your data will be collected in person, using a paper-based consultation form.

### Why is your data being collected and how is it used?

We collect your additional consultation data to ensure that we provide you with the correct, ongoing treatment. Occasionally, we may contact you to inform you of our newly-available treatments or special promotions which are coming up.

### How is your data being stored and protected?

Your consultation data will remain on the paper-based consultation form and stored in a locked filing cabinet.

## **Processing and disclosure of your data**

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We only use your data in ways which you would reasonably expect and not in any way that is intrusive or which could cause you harm.

### **How is my data processed and by whom?**

In all cases, your data will be collected by Claudia Adams and only Claudia will process that data.

### **Who has access to my data?**

Your data is confidential and no other party has access to it. Only under the following circumstances, would we disclose your information:

- It has been authorised by you.
- In the event that we undergo re-organisation or are sold to a third party, in which case, you agree that any personal information we hold about you will be transferred to that third party under the same privacy terms, unless authorised by you.
- It is required by fraud prevention agencies.
- It is required by law.
- If you make a complaint to us about the service we have provided, we may be obliged to supply details about your complaint, including your personal information.

# Disposal of your data

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## How will my data be securely disposed of and when?

Your digital data will be deleted and your paper-based consultation data will be destroyed, using a paper shredder, 6 years after your treatment, unless you return for further treatments within that time.

If a gift voucher has been posted to a third party recipient, the voucher request form will be destroyed immediately, using a paper shredder.

## Legal basis for collecting your data

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Your data is held on a 'legitimate interest' basis, allowing us to make your booking, post your goods to you, safely provide you with your correct treatment and to inform you of treatments and promotions which could be of benefit to you.

Only clients who are considered existing customers, by receiving treatment, may be informed of any such treatments and promotions. Note that, if you contact us but your booking is not finalised, or you cancel your appointment, we will not attempt to market to you in the future, without requesting your consent.

# Your control over your data

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## Can I have access to my data?

At any time, you may ask us for a copy of your personal data, which we hold, and we will comply within a month.

## Can I stop the use of my data?

You may, at any time, request the correction or removal of any personal data, which we hold about you. This would allow you to control a simple request, such as removing yourself from marketing by text only, or a larger request, such as the entire deletion and shredding of all of your records.

This can be achieved by contacting Claudia Adams, by phone, text or email:

Phone and text: 07867 77 44 66

Email: [claudia@holisticure.co.uk](mailto:claudia@holisticure.co.uk)

Ensure that, before you destroy any of your data, you are aware of the consequences of stopping the holding of your data, as described in the following section.

## What are the consequences of stopping the holding of my data?

Stopping the holding of your contact data will create a less efficient and less personal service for you, whereby, we would need to continually ask you who you are each time you contact us.

Stopping the holding of your consultation data would result in the need for a full consultation every time you visit us, which will reduce the time spent on your treatment. It could also place a risk on us understanding your conditions in full, which help us to provide the correct treatment.

Removing yourself from any or all forms of marketing may result in you missing out on some beneficial services and offers.

## **Managing a breach of your data**

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In the unlikely event of a data breach of your consultation data (which is stored only in a locked filing cabinet within our clinic), we would inform you and report the breach to the Information Commissioner's Office (ICO) within 72 hours of finding out.

## **Updates to this Privacy Policy**

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We reserve the right to amend or update this Privacy Policy at any time and in response to changes in the Data Protection legislation. We will notify you of any changes we consider to be significant, but it is important that you come back from time to time to check for any updates and to ensure that you are happy with them.