

INTRODUCTION to Equibliss GDPR

This privacy notice provides you with details of how I/we collect and process your personal data through your use of my / our site www.equibliss.co.uk or in person at my/our practice.

By providing me / us with your data, you warrant to us that you are over 13 years of age.

Kate Granger / Equibliss [is/am/are] the data controller and I am / we are responsible for your personal data (referred to as “I”, “my”, “we”, “us” or “our” in this privacy notice).

Contact Details (note only some of these may be applicable depending upon your circumstances)

My / Our full details are: Kate Granger

Full name of practitioner / legal entity: Kate Granger T/A Equibliss Shiatsu

Postal address of practitioner / legal entity: 4 Portland Street St Albans AL3 4RB

Email address of practitioner: equibliss@mac.com

Mobile telephone number of practitioner: 07956967984

It is very important that the information I / we hold about you is accurate and up to date. Please let me / us know if at any time your personal information changes by emailing me / us at equibliss@mac.com or by writing to me / us at the above postal address

WHAT DATA DO I / WE COLLECT ABOUT YOU, FOR WHAT PURPOSE AND ON WHAT GROUND WE PROCESS IT

Personal data means any information capable of identifying an individual. It does not include anonymized data.

I / we may process the following categories of personal data about you:

Communication Data that includes any communication that you send to me / us whether that be through the contact form on my / our website, through email, text, social media messaging, social media posting or any other communication that you send to me / us. I / We will process this data solely for the purposes of communicating with you for record keeping purposes. My / Our lawful grounds for this processing is my / our legitimate interests which in this case is / are to reply to communications sent to me / us, for the purpose of keeping records up to date.

Customer Data that includes data relating to any treatments sessions / services such as your name, title, home address, email address, and phone number(s). I / We process this data to supply the treatments and/or services you have purchased and to keep records of such transactions. My / Our lawful grounds for this processing is the performance of a contract between you and me / us and/or taking steps at your request to enter into such a contract.

User Data that includes data about how I / you use my / our website and any online services together with any data that you post for publication on my / our website or through other online services. I / We process this data to operate my / our website and ensure relevant content is provided to you, to ensure the security of my / our website, to maintain backups of my / our website and/or databases and to enable publication and administration of my / our website and for other online services and business. My / Our lawful grounds for this processing is my / our legitimate interests which in this case are to enable us to properly administer my / our website and my / our business.

Technical Data that includes data about your use of my / our website and online services such as your IP address, your login data, details about your browser, length of visit to pages on our website, page views and navigation paths, details about the number of times you use my / our website. The source of this data is from my / our analytics tracking system. I / We reserve the right to process this data to analyse your use of my / our website and other online services, to administer and protect my / our business and website, to deliver relevant website content and advertisements to you and to understand the effectiveness of my / our advertising. My / Our lawful grounds for this processing is my / our legitimate interests which in this case is / are to enable me / us to properly administer my / our website.

Marketing Data that includes data about your preferences in receiving marketing from me / us and my / our third parties and your communication preferences. I / We process this data to enable me / us to you to provide you with details of the services I / we provide, to deliver relevant website content and advertisements to you and measure or understand the effectiveness of this advertising. My / Our lawful grounds for this processing is my / our legitimate interests which in this case is / are to develop my / our marketing strategy.

I / We may use Communications Data, Customer Data, User Data, Technical Data and Marketing Data to deliver relevant website content and advertisements to you (including Facebook adverts or other display advertisements) and to measure or understand the effectiveness of the advertising I / we serve to you. My / Our lawful grounds for this processing is legitimate interests which is to operate my / our business. I / We may also use such data to send other marketing communications to you. My / Our lawful ground for this processing is either consent or legitimate interests.

I / We may collect Sensitive Data about you. Sensitive Data refers to data that includes details about your health and current and historic medical information. Sensitive Data is collected on a confidential basis for the sole purpose of conducting Shiatsu and / or other complementary medical treatments. I / We do not collect data about your race or ethnicity, religious or philosophical beliefs or sexual orientation.

HOW I / WE COLLECT YOUR PERSONAL DATA

I / We may collect data about you by you providing the data directly to me / us (for example by filling in forms in my / our practice, on my / our website or by sending me / us emails). I / We may automatically collect certain data from you as you use my /

our website by using cookies and similar technologies. Please see my / our cookie policy for more details about this.

I / We may receive data from third parties such as analytics providers such as Google based outside the EU, advertising networks such as Facebook based outside the EU, such as search information providers such as Google based outside the EU, providers of technical or payment services, such as data brokers or aggregators.

MARKETING COMMUNICATIONS

My / Our lawful ground of processing your personal data is to send you marketing communications based upon your consent.

I / We may send you marketing communications from me / us if (i) you purchased a treatment session or asked for information from me / us about my / our services or (ii) you agreed to receive marketing communications, and, in each case, you have not opted out of receiving such communications. You can still opt out of receiving marketing emails from me / us at any time by contacting me / us by email or post at the contact details provided in this Privacy Policy.

Before I / we share your personal data with any third party for their own marketing purposes I / we will obtain your express consent.

You can ask me / us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you.

If you opt out of receiving marketing communications, this opt-out does not apply to personal data provided as a result of other transactions including patient treatment sessions.

DISCLOSURES OF YOUR PERSONAL DATA

I / We may have to share your personal data with the parties set out below:
Service providers who provide IT and system administration services.
Professional advisers including lawyers, bankers, auditors and insurers
Government bodies that require me / us to report processing activities.
Third parties to whom I / we sell, transfer, or merge parts of my / our business or my / our assets.

I / We require all third parties to whom I / we transfer your data to respect the security of your personal data and to treat it in accordance with the law of England and Wales / Scotland. I / We only allow such third parties to process your personal data for specified purposes and in accordance with my / our instructions.

DATA SECURITY

I / We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. I / We also allow access to your personal data only to those employees and partners who

have a business need to know such data. They will only process your personal data on my / our instructions and they must keep it confidential.

I / We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach if I / we are legally required to.

DATA RETENTION

I / We will only retain your personal data for as long as necessary to fulfil the purposes I / we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

When deciding what the correct time is to keep the data for I / we look at its amount, nature and sensitivity, potential risk of harm from unauthorised use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.

For tax purposes the law requires me / us to keep basic information about my / our customers (including contact data) for six years after they stop being clients.

In some circumstances I / we may anonymise your personal data for research or statistical purposes in which case I / we may use this information indefinitely without further notice to you.

YOUR LEGAL RIGHTS

Under data protection laws you have rights in relation to your personal data that includes the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent.

You can see more about these rights at:

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

If you wish to exercise any of the rights set out above, please contact me / us at the addresses shown in this Privacy Policy. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, I / we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive and I / we may refuse to comply with your request in these circumstances.

I / We may need to request specific information from you to help me / us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. I / We may also contact you to ask you for further information in relation to your request to speed up my / our response.

I / We will try to respond to all legitimate requests within one month. Occasionally it may take me / us longer than a month if your request is particularly complex or you have made a number of requests. In this case, I / we will notify you.

If you are not happy with any aspect of how I / we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). I / We would be grateful if you could contact me / us first if you do have a complaint so that I / we can try to resolve it for you.

THIRD-PARTY LINKS

My / Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. I / We do not control these third-party websites and are not responsible for their privacy statements. When you leave my / our website, I / we encourage you to read the privacy notice of every website you visit.

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of my / our website may become inaccessible or not function properly. Further information about the cookies I / we use includes:

My / Our website may place and access certain Cookies on your computer. These Cookies are used to improve your experience of using the my / our website and to improve my / our range of treatments and services. I / We have carefully chosen these Cookies and steps have been taken to ensure that your privacy is protected and respected at all times.

All Cookies used by this Website are used in accordance with current UK and EU Cookie Law.

Before the Website places Cookies on your computer, you will be presented with a message bar requesting your consent to set those Cookies. By giving your consent to the placing of Cookies, you are enabling me / us to provide a better experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of my / our website may not function fully or as intended.

This Website may place the following Cookies:

Strictly necessary cookies: These are cookies that are required for the operation of my / our website. They include, for example, cookies that enable you to log into secure areas of my / our website.

Analytical/performance cookies: They allow me / us to recognise and count the number of visitors and to see how visitors move around my / our website when they are using it. This helps me / us to improve the way my / our website works, for

example, by ensuring that users are easily finding the information they are searching for.

Functionality cookies: These are used to recognise you when you return to my / our website. This enables me / us to personalise my / our content for you, which might include greeting you by name and remember your preferences.

Targeting cookies: These cookies record your visit to my / our website, the pages you have visited and the links you have followed. I / We will use this information to make my / our website and any advertising displayed on it more relevant to your interests. I / We may also share this information with third parties for this purpose.

You can choose to enable or disable Cookies in your internet browser. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser.

You can choose to delete Cookies at any time; however, you may lose any information that enables you to access my / our website more quickly and efficiently including, but not limited to, personalisation settings.

It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings

This Privacy Policy was last updated on 06/06/2018