

Harriet Hain

*Advanced Remedial Massage Therapist
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Our Privacy Policy

Your privacy is very important to us and we will always endeavour to comply with the latest applicable data protection measures to ensure fairness, transparency, accuracy, security, minimisation and respect for your rights with regard to your personal data which we gather. So, to comply with the latest European General Data Protection Regulation (GDPR)¹ we have updated our Privacy Policy. We also endeavour to work with reputable 3rd party providers who have the same data protection principles. Please advise us if you find this not to be the case at any time.

We also strive to give our users and clients the best client/user experience possible with the best choice of appointments, events and other website content, material, products and/or services with speed, accuracy and relevance whilst at the same time protecting our user/clients' privacy. We hope that we have found the right balance through this policy document. This is what this means in terms of what we may collect when you visit our website, what we do with it and what you can tell us to do with it. By using our website, you will be asked to consent that you agree that we may collect and use your personal information in this way. You may also withdraw that consent at any time.

[You will be asked to give your express, informed consent to our Privacy Policy]

Our website will typically collect the type of personal information mentioned below from and about you when you visit or browse our website material, products and/or services and when you make an enquiry or appointment with us or subscribe to any of our events, publications, newsletters, marketing, updates or other material or media from us or any of our providers or other services or order any products of any kind from us. If we exchange emails or other communications or enter into any other relationship with you, we also obtain additional personal information but again we will use our best endeavours only to use or disclose such information in the manner stated below.

1. The type of Personal Information which we/our providers may gather from or about you.

Each time you visit, browse or use our website, we collect some or all of the following information either directly from your own disclosure or through our website software:

¹ <https://www.eugdpr.org/key-changes.html>

- Your IP address, browser type and location, unique device identifiers, language preference, the date, time and frequency of your visits, which pages you viewed and for how long and if you clicked, copied or downloaded any material, and similar information from your general online use and preferences, gathered by the use of cookies and similar technologies (see clause 9 below);
- any appointments, events and other website content, material, products and/or services which you either viewed, used, copied, downloaded or clicked a link to access or about which you made an enquiry or appointment or order any products of any kind from us at any time;
- your acceptance (or otherwise) to receive any publications, newsletters, marketing, updates or other material or media from us or any of our providers or other services;
- your consent (or otherwise) to this Privacy Policy and your agreement to our Terms and Conditions.

If you are an existing user/client, then we may already have the above information and your consent to this Privacy Policy will also cover this past information.

If you are buying/paying online, we and/or our **3rd party secure payment provider** will need your first and last name, your credit/debit card or other payment details, card billing address, including street name, city or town, a telephone number and an email address, which may be personal or business. Please note that only our 3rd party secure payment provider will have your card number to process your payment, we do not see or have access to that number but we do have access to the other data you provide.

If any goods require to be physically delivered (for example products or any of our hard copy marketing, publications, CDs, DVDs or other products) then a physical delivery address (personal or business) (if different from the billing address) will also be required.

If we need to verify your age and/or identity for any reason (for example, payment verification, fraud prevention or dispute resolution) we may also ask you for your age (only to confirm that you are of legal age to contract), passport/ID/Visa/driver's licence (these documents will also have your place of birth, gender, nationality and a facial image of you), your social security/national insurance number, or any other identifier if required for identifying you as a specific individual.

If we want to identify you further to gain a better profile or business relationship with you, we may use the material which you have included on publicly available websites such as that of your company/employer/professional website, LinkedIn, Facebook, Instagram and other social media sites, which may include additional information or photographs.

You can access your personal details at any time, ask us to update the information we hold or to delete it altogether (see clause 7 for your rights over your personal information).

2. Communicating with you

Each time you make an enquiry or appointment or order any products of any kind from us or subscribe to any event, or any of our publications, newsletters, marketing, updates or other material or media from us or any of our providers or other services, we will send you an email replying to your enquiry or confirming your appointment or subscription. We also reserve the right to send you email, sms or other communications from time to time regarding updates and changes to our appointments, events and other website content, material, products or services; or about new links, partners, providers or suppliers to our website. You can choose not to receive by unsubscribing.

If we require to email you any technical support, administrative, operational, health, medical or legal notices important to our website or about appointments, events and other website content, material, products or services that we consider essential that you know, including any breach of security relating to your personal information, you will not be able to unsubscribe from these notices as they may contain, for example, new privacy terms, conditions or situations, important information about or updates to appointments, events, health, medical information and other website content, material, products and /or services about which you made an enquiry, or appointment with us at any time or subscribed to from us, or any cancellation or postponement notices.

3. How your Personal Information is used by us

We want to give you the best client/user experience possible with the best choice of appointments, events and other website content, material, products and/or services that we can with speed, accuracy and relevance. To do this, we need to collect sufficient information about you and users in general to enable us to operate the website and keep it current, up-to-date, relevant to users' needs and preferences now and in the future as well as to keep it secure and in compliance with the applicable law.

We also need to use your personal information for the purposes specified in clause 1 above (your consent, payment, delivery and identity) as well as:

- to respond to your enquiries, appointments, health and medical needs, events, subscriptions, payments and to and answer your queries, comments or complaints;
- to operate our website professionally, efficiently and legally and ensure its security (as well as your security); and for maintenance, upgrade and enhancement (see clause 5 below and our Terms and Conditions);
- for business and statistical analysis by our own staff and professional advisors;
- to provide payment, download and/or delivery methods and other 3rd party services (which may include opening an account or subscription, credit-worthiness checks, etc);
- to provide you with information on new appointments, locations, medicines, products, updates, marketing, promotions, events, webinars and other material which you have consented/subscribed to or otherwise may expect from us as part of our general offering (you can unsubscribe from any of this material); and
- for our legitimate interests and such other internal business reasons, including but not limited to disclosing your personal information to any employee, business adviser, consultant, partner, contractor, provider; risk management/credit reference/debt

collection/fraud prevention agencies; compliance/fiscal/regulatory/legal or government bodies.

4. How long we will keep your Personal Information

We will only keep your personal information for as long as is necessary for the purposes for which it was gathered, given voluntarily by you, is publicly available or was otherwise processed as specified in this policy document. In certain circumstances, we may store it for a longer period if so required for example, by applicable laws, regulators, payment protection, law enforcement or for secure archiving. In any case of longer storage by us, the terms of this policy document will continue to apply.

5. Personal Information shared with Third Parties

We will not sell, rent or otherwise disclose your personal information to any third party without your consent **except in the following circumstances:**

- Where we use or partner with **trusted third party providers** to provide services for us, including, for example, processing of debit/credit card payments, to manage and store your appointments, health and medical details, as well as sending out our marketing newsletters or other material; for site security, hosting, management and other IT/professional/insurance and operational services. These companies will have access to only the personal information needed to perform their specific functions and not for any other purposes. They are bound by confidentiality agreements as well as their own privacy policies to which you may also be given the opportunity to accept or decline. Please note that we are not responsible for the privacy practices of such other third parties and advise you to read the privacy statements of each. Your use of such third parties is at your own risk.
- If we require to disclose your personal information to an appropriately qualified third party, for example, if you have asked us to liaise with another practitioner, x-ray department or your doctor;
- If we require to disclose your personal information to an appropriate investigative third party, for example, if we have reason to believe that you may be involved in any illegal or harmful conduct or if we are required to do so under the applicable law, by a law enforcement or government authority or if we believe that such action is necessary to:
 - (1) comply with the law or with legal process;
 - (2) protect and defend our rights, security or property or that of our clients or providers;
 - (3) prevent fraud and other illegal acts;
 - (4) protect against abuse, misuse or unauthorised use of our website in any way; or
 - (5) protect our personal safety or property and that of our users, clients, providers or the public (e.g. if you provide false or deceptive information about yourself or attempt to pose as someone else or defame/libel any party we will disclose such information about you in order to assist any type of investigation into your actions).
- We may share non-personal, non-individual information in aggregate form with third parties for business purposes, for example with advertisers or prospective advertisers on our website or we may tell our business partners or prospective business partners the number of

patients in certain demographic groups who viewed, purchased, licensed or subscribed to certain content, material, products or services or share other statistical analyses. This does not involve disclosing any personal information which can identify any individual patient in any way.

- We may transfer our patient database, including personal information contained therein, to a third party who acquires all or substantially all of the assets or stock in our company or our website service whether by merger, acquisition, reorganisation or otherwise. They will be bound to protect your personal information to no lesser standard than we do so in this policy.
- Where a specific third party provider asks you to accept their own privacy policy, for example, any social media or payment provider.

7. Your rights over your Personal Information

You have the right to:

- Access your personal information that we have about you and to have us correct, update, restrict, anonymise, block or have us delete it (unless we are legally obliged to keep it);
- Withdraw your consent at any time to all or any particular service for example, remove your name from marketing material.
- Request us to send you a copy, free of charge, of your personal information that we have about you;
- Request us to transfer your personal information to another person, organisation or business of your choosing.
- Make any complaint by contacting us at harriet@harriethain.co.uk or the information commissioner at <https://ico.org.uk/for-organisations/guide-to-pecr/complaints/> if you do not believe that we have handled your personal information correctly or have another complaint.

In order to comply with any of the above requests, we will require you to identify yourself or if you have appointed an authorised third party to act on your behalf, then we will ask them to prove that they have your authority to act in this capacity.

All these requests should be directed to: harriet@harriethain.co.uk

8. Links

Our website contains hyperlinks to other websites owned and operated by independent third parties. Please note that we are not responsible for the privacy practices of such other third party websites and advise you to read the privacy statements of each website you visit which collects your personal information. Your use of such third party websites is at your own risk.

9. Cookies and similar technologies

A cookie is an alphanumeric identifier which we transfer to your hard drive through your web browser when you visit our website from whatever device you are using. Pixel tags (also called web beacons) are small blocks of code placed on websites and emails.

We use cookies, pixel tags and other similar technologies to help us identify and track visitors, usage and access preferences for our appointments, events, products, and other website content, material, products and/or services including third party products and/or services and hyperlinks) as well as track and understand, for example, an email campaign effectiveness and to deliver targeted material. These technologies enable our own system to recognise you when you visit our website again and improve our service to you and to help us give you the best client/user experience possible with the best choice of appointments, events, products, and other website content, material, products and/or services with speed, accuracy and relevance. Cookies may also be used to compile aggregate information about areas of our website that are visited most frequently. This traffic information can be used to enhance the content of our website and make your use of it easier. If you wish to reject our cookies and other similar technologies, you can activate the setting on your browser which will enable you to do so, for example: Internet Explorer – <https://www.microsoft.com/info/uk-en/cookies.msp> ; Safari – https://support.apple.com/kb/ph19214?locale=en_US

Please note: If you do switch off these technologies, then it will affect how you view and use our website and some functionality will not be available to you. To find out more about using your browser settings to control cookies please visit: www.allaboutcookies.org

10. Updating our Privacy policy

We will update our Privacy Policy and procedures from time to time to make sure they properly, effectively and legally cover your personal information and are up-to-date. We will publish the updated policy on our website so please check it regularly. If there are changes which are important to bring to your notice we will advise you accordingly on our website and/or seek your further consent if so required by the applicable law.

11. Who we are and How to contact us

Please see who we are on our webpage: <http://www.harriethain.co.uk/therapist.html>. If you have any questions about our Privacy policy, please contact us at harriet@harriethain.co.uk