

FHT Privacy Policy



****All information is from the ICO website. Please visit www.ico.org.uk for further information***

Company name: Reflexation: Bodywork & Yoga

Address: 3A Stratton Terrace, Falmouth, TR11 2SY

Contact Details: 3A Stratton Terrace, Falmouth, TR11 2SY

+44 0778065404

chloe@reflexationtherapy.co.uk

Last updated: July 2023

The type of personal information we collect

We currently collect and process the following information:

- Full name, Contact phone number, Postal address
- Date of Birth
- Health information: allergies, skin conditions, medical history, current medications, current acute or chronic health conditions, bodywork treatment notes
- Email addresses (optional)

How we get personal information and why we have it

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- You attended a first bodywork treatment appointment, and in our initial consultation you gave us relevant information for our records about your identity, and relevant information about your health - including any allergies.
- You have made an information request to us about Reflexation bodywork treatments or yoga sessions.
- You booked an appointment or yoga session.
- You subscribe to our digital newsletter.

- You visited our website and made an account with us, used an online form or commented on a blog post.
- You engaged with us on social media.
- You commented or reviewed on one of our products or services.
- You ordered a product or service from Reflexation and financial information was taken to fulfil the order
- You are representing your organisation to make an enquiry.
- You have completed a survey or competition that we are delivering or supporting.

We also receive personal information indirectly, from the following sources in the following scenarios:

- Details of your visits to our site [including, but not limited to, traffic data, location data, device model and version, operating system, weblogs and other communication data, whether this is required for our own billing purposes or otherwise] and the resources that you access.
- From time to time, we may receive personal information about you from third party sources – for example, partners with whom we offer co-branded services or events, or engage in joint marketing activities, and publicly available sources such as social media websites.

Our website is not intended for or targeted at children under 16, and we do not knowingly or intentionally collect information about children under 16. If you believe that we have collected information about a child under 16, please contact us at chloe@reflexationtherapy.co.uk, so that we may delete the information.

We use the information that you have given us in order to do the following:

- To ensure that content from our site is presented in the most effective manner for you and for your device.
- To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.
- To carry out our obligations arising from any contracts entered in to, between you and us.
- To allow you to participate in interactive features of our service, when you choose to do so.
- To notify you about changes to our service.

IP ADDRESSES / LOG FILES

When you use our services our view content provided by us, we automatically collect information about your computer hardware and software. This information can include your IP address, browser type, domain names, internet service provider (ISP), the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system, clickstream data, access times and referring website addresses. This information is used by Reflexation to provide general statistics regarding use of the Reflexation Website. This is statistical data about our users' browsing actions and patterns and is not used to identify any individual.

How we store your personal information

Your information is securely stored, as follows:

YOUR PERSONAL DIGITAL DATA

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. Reflexation will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted [using SSL technology]. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to prevent unauthorised access.

YOUR PERSONAL PHYSICAL DATA

Physical notes taken in consultation or treatment sessions are kept under secure lock and key, and filed for reliable recovery in required at any time.

RETENTION OF PERSONAL INFORMATION - DIGITAL

How long we keep information we collect about you depends on the type of information, as described in further detail below. After such time, we will either delete or anonymize your information or, if this is not possible, then we will securely store your information and isolate it from any further use until deletion is possible.

We retain Personal Information that you provide to us where we have an ongoing legitimate business need to do so (for example, as long as is required in order to contact you about a service you have signed up to, or as needed to comply with our legal obligations, resolve disputes and enforce our agreements).

When we have no ongoing legitimate business need to process your Personal Information, we securely delete the information or anonymise it or, if this is not possible, then we will securely store your Personal Information and isolate it from any further processing until deletion is possible. We will delete this information from the servers at an earlier date if you so request, as described in "[To Unsubscribe from Our Communications](#)" below.

RETENTION OF PERSONAL INFORMATION - PHYSICAL

Physical notes received in consultation or treatment sessions are kept for a minimum of seven years after your last treatment. Your physical data is filed securely and you are free to request access to this information at any time.

SHARING YOUR INFORMATION

We never sell Personal Information to any third party

We use data processors who are third parties who provide elements of services for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct. For example we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns.

We may send information or Reflexation content to you which we think may be of interest to you by post, email, or other means and send you marketing communications relating to our business. [In the case of loyalty scheme members, we'll also offer you relevant rewards.];

We may promote use of our services to you and share promotional and information content with you in accordance with **your** communication preferences;

We may provide other companies with statistical information about our users -- but this information will not be used to identify any individual user;

We may send information to you regarding changes to our Customer Terms of Service, Privacy Policy (including the Cookie Policy), other legal agreements OR to meet legal requirements.

The data privacy law allows this as part of our legitimate interest in understanding our customers and providing the highest levels of service.

Of course, if you wish to change how we use your data, you'll find details in the ['Your Rights' section below](#).

We may, from time to time, contact you on behalf of external business partners about a particular offering that may be of interest to you. In those cases, we do **not** transfer your Personal Information to the third party.

[We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in SW1). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.]

LEGAL BASIS FOR PROCESSING PERSONAL INFORMATION (EEA VISITORS)

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing personal information are:

- (a) Your consent. You are able to remove your consent at any time. You can do this by contacting chloe@reflexationtherapy.co.uk
- (b) We have a contractual obligation.
- (c) We have a legal obligation.
- (d) We have a vital interest.
- (e) We have a legitimate interest.

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it. However, we will normally collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from you.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information). Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

We may disclose your personal information to third parties:

- If we (or our assets) are acquired by another company, whether by merger, acquisition, bankruptcy or otherwise, that company would receive all information gathered by Reflexation on the websites and through service provision. In this event, you will be notified via email and/or a prominent notice on our website, of any change in ownership, uses of your Personal Information, and choices you may have regarding your Personal Information.
- We reserve the right to use or disclose your Personal Information if required by law or if we reasonably believe that use or disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or comply with a law, court order, or legal process.

Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at chloe@reflexationtherapy.co.uk, +44 7780665404 or 3A Stratton Terrace, Falmouth, TR11 2SY, UK if you wish to make a request.

As we are processing your personal data for our legitimate interests as stated above, you have the right to object to our processing of your personal data. There are legitimate reasons why we may refuse your objection, which depend on why we are processing it.

You have the right to ask us not to process your personal information. You can exercise your right to prevent marketing use of your Personal Information by checking tick boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at chloe@reflexationtherapy.co.uk.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

HOW WE PROTECT YOUR PERSONAL INFORMATION

We know how much data security matters to all our customers. With this in mind we will treat your data with the utmost care and take all appropriate steps to protect it.

We secure access to all transactional areas of our websites using 'https' technology.

Access to your personal data is password-protected, and sensitive data such as payment card information) is secured to ensure it is protected.

We regularly monitor our system for possible vulnerabilities and attacks.

Paper copies of consultation and treatment notes are kept under secure lock and key and filed for reliable access if required to be extracted at any time.

HOW TO ACCESS & CONTROL YOUR PERSONAL DATA

Reviewing, Correcting and Removing Your Personal Information

You have the following data protection rights:

- You can request access, correction, updates or deletion of your personal information.
- You can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information.
- If we have collected and processed your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the right to complain to a data protection authority about our collection and use of your personal information. Contact details for [data protection authorities in the UK are available here](#).

To exercise any of these rights, please contact us at chloe@reflexationtherpay.co.uk or by mail to 3A Stratton Terrace, Falmouth, TR11 2SY, using the subject title: Privacy. We will respond to your request to change, correct, or delete your information within a reasonable timeframe and notify you of the action we have taken.

To UNSUBSCRIBE FROM OUR COMMUNICATIONS

You may unsubscribe from our marketing communications by clicking on the "unsubscribe" link located on the bottom of our e-mails, updating your communication preferences, or by sending us email us at chloe@reflexationtherapy.co.uk with the subject title 'Privacy'.

CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. We regularly review and, where necessary, update our privacy information.

If we plan to use personal data for a new purpose, we update our privacy information and communicate the changes to individuals before starting any new processing.

CONTACT

Questions, comments and requests regarding this privacy notice are welcomed and should be addressed to Dr Chloë Cyrus-Kent, chloe@reflexationtherapy.co.uk, 3A Stratton Terrace, Falmouth, Cornwall, TR11 2SY, UK.

Complaints

If you have any concerns about our use of your personal information, you can make a complaint to us at Dr Chloë Cyrus-Kent, chloe@reflexationtherapy.co.uk, 3A Stratton Terrace, Falmouth, Cornwall, TR11 2SY, UK

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>