

PRIVACY NOTICE

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[ESSENTIALLY BETH] ("We") are committed to protecting and respecting your privacy.

Our Privacy Notice tells you what we do with your personal data, why we use it, who we share it with and how long we keep it. As it's your data you have the right to know what happens with it. The types of data that we hold about you and how long we keep it, will depend on your relationship with us and the reasons why we have it.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the General Data Protection Regulations and Data Protection Act 2018 (the **Act**), the data controller is [ESSENTIALLY BETH] of [35 Belmont Park, Pensilva, Liskeard, Cornwall].

Essentially Beth is registered with the Information Commissioner's Office (ICO) as a data controller.

[Our nominated representative for the purpose of the Act is [Beth] who is contactable on [essentiallybethoillife@gmail.com].

HOW DO WE GET INFORMATION?

HEALTH AND SPECIAL CATEGORY DATA

AS PART OF PROVIDING THERAPEUTIC SERVICES (INCLUDING MASSAGE, REIKI, ESSENTIAL OIL CONSULTATIONS AND RELATED TREATMENTS), I COLLECT HEALTH INFORMATION AND OTHER SPECIAL CATEGORY DATA.

THIS MAY INCLUDE:

- MEDICAL HISTORY
- CURRENT MEDICATIONS
- ALLERGIES AND CONTRAINDICATIONS
- PREGNANCY STATUS
- TREATMENT NOTES AND SESSION OBSERVATIONS
- INFORMED CONSENT RECORDS

THIS INFORMATION IS COLLECTED SOLELY TO ASSESS SUITABILITY, PROVIDE SAFE TREATMENTS, AND MEET PROFESSIONAL AND INSURANCE REQUIREMENTS.

SPECIAL CATEGORY DATA IS PROCESSED UNDER:

- ARTICLE 9(2)(H) UK GDPR – PROVISION OF HEALTH OR THERAPEUTIC SERVICES
- ARTICLE 9(2)(A) UK GDPR – EXPLICIT CONSENT WHERE APPROPRIATE

HEALTH INFORMATION IS TREATED WITH THE HIGHEST LEVEL OF CONFIDENTIALITY AND IS NEVER SOLD OR USED FOR MARKETING PURPOSES.

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

- You have made an information request to us.
- You booked an appointment or booked to attend / have attended an event.
- 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 [ESSENTIALLY BETH] and financial information was taken to fulfil the order
- You have applied for a job / secondment / internship / apprenticeship with us.

- 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 information indirectly

- 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 [ESSENTIALLYBETHOILLIFE@GMAIL.COM], so that we may delete the information.

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 [ESSENTIALLY BETH] to provide general statistics regarding use of the [ESSENTIALLY BETH] Website. This is statistical data about our users' browsing actions and patterns and is not used to identify any individual.

WHERE WE STORE YOUR PERSONAL 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. [ESSENTIALLY BETH **OR** We] 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.

USES MADE OF THE INFORMATION

We use information held about you in the following ways:

- 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.

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 [ESSENTIALLY BETH] 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

UNDER UK GDPR, I RELY ON THE FOLLOWING LAWFUL BASES:

- CONTRACT – WHERE PROCESSING IS NECESSARY TO PROVIDE BOOKED TREATMENTS OR SERVICES.
- LEGITIMATE INTERESTS – TO OPERATE AND IMPROVE MY BUSINESS, MANAGE BOOKINGS, AND RESPOND TO ENQUIRIES.
- CONSENT – WHERE YOU HAVE GIVEN CLEAR CONSENT FOR MARKETING COMMUNICATIONS OR OPTIONAL SERVICES.
- LEGAL OBLIGATION – WHERE PROCESSING IS REQUIRED TO COMPLY WITH INSURANCE, TAX OR REGULATORY REQUIREMENTS.

WHERE HEALTH INFORMATION OR OTHER SPECIAL CATEGORY DATA IS PROCESSED, I RELY ON:

- ARTICLE 9(2)(H) – PROVISION OF HEALTH OR THERAPEUTIC SERVICES.
- ARTICLE 9(2)(A) – EXPLICIT CONSENT WHERE APPLICABLE.

YOUR RIGHTS

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 [essentiallybethoillife@gmail.com].

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 consultation forms and treatment notes are stored securely within a private home office in access-controlled storage.

Digital records are stored on a password-protected device and backed up using secure, two-factor authenticated cloud storage.

RETENTION OF PERSONAL INFORMATION

Treatment records are retained in accordance with professional insurance requirements and UK GDPR.

In line with my Balens insurance policy:

- Adult client records are retained for a minimum of 7 years.
- Records relating to minors are retained for 7 years after they reach the age of 18.
- Records relating to vulnerable adults may be retained longer where appropriate.

Records are retained for the establishment, exercise, or defence of potential legal claims. After the applicable retention period, records are securely destroyed.

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 [ESSENTIALLYBETHOILLIFE@GMAIL.COM], 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 [ESSENTIALLYBETHOILLIFE@GMAIL.COM] 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 [essentiallybethoillife@gmail.com].