



SHARON HANTON REFLEXOLOGY – PRIVACY POLICY

This notice refers to personal data, which is defined as any information that can be used to identify a living person. The General Data Protection Regulations (GDPR) introduced new legal protection for personal information in May 2018. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data and its storage.

This policy tells you what personal information is gathered, why and what your rights are.

This policy is effective from 17 March 2021. This is the first version of this policy and it will be reviewed annually or in the light of any change in legislation.

Name and Contact Details

Sharon Hanton
Sharon Hanton Reflexology
Baillie, Meikle Wartle, Inverurie, Aberdeenshire AB51 5AA
Email: info@sharonhantonreflexology.co.uk **Tel:** 07976 219083

Who is Sharon Hanton Reflexology?

Sharon Hanton Reflexology provides reflexology treatments. Treatments are carried out in accordance with the Association of Reflexologists' Code of Conduct.

Data Controller

All data is stored and managed by Sharon Hanton Reflexology.

The Purpose of Processing Client Data

In order to give professional reflexology treatments, I will need to gather and retain potentially sensitive information about your health. I will only use this information for informing reflexology treatments and associated recommendations concerning aspects of health and wellbeing which may be offered.

Data that is collected via my website is basic contact details (Name, Email address, Telephone number and Enquiry Reason) and used to allow me to contact you and handle potential bookings.

Lawful Basis for Holding and Using Client Information

As a full member of the Association of Reflexologists, I abide by the AoR Code of Practice and Ethics. The lawful basis under which I hold and use your information is:

- my legitimate interests i.e. my requirement to retain the information in order to provide you with the best possible treatment options and advice
- my requirement to hold your information for the following legal reasons:
 - 'Claims Occurring' Insurance
 - Law regarding Children's Records
 - Your Consent

As I hold Special Category data (i.e. Health Related Information) the Additional Condition under which I hold and use this information is: for me to fulfil my role as a Health Care Practitioner bound under the AoR Confidentiality as defined in the AoR Code of Practice and Ethics.

Data Held and its Purpose

- **Medical Information:** for the purposes of providing treatment, Sharon Hanton Reflexology may require detailed medical information. I will only collect what is relevant and necessary for your treatment. When you visit the practice, I will make notes which may include details concerning your medication, treatment and other issues affecting your health. This data is always held securely, is not shared with anyone not involved in your treatment. To be able to process your personal data it is a condition of any treatment that you give your explicit consent to allow Sharon Hanton Reflexology to document and process your personal medical data.
- **Contact Details:** provided by you such as telephone numbers, email addresses, postal addresses may be used to remind you of future appointments, provide reflexology information or information related to your health.
- **Marketing:** Sharon Hanton Reflexology may also use the contact details provided by you to respond to your enquiries, including making telephone contact or emailing information to you which I believe may be of interest to you. From time-to-time, and with your consent, Sharon Hanton Reflexology may contact you with special offers and promotions (from which you may unsubscribe from at any time). In making initial contact with the practice you consent to Sharon Hanton Reflexology maintaining a marketing dialogue with you until you either opt out (which you can do at any time) or I decide to desist in promoting Sharon Hanton Reflexology's services. You can ask to be removed from our marketing database by emailing or phoning the practice using the contact details provided.

Sharon Hanton Reflexology will only collect the information needed so that the services you require can be provided and will not share your information with anyone else (other than as required for legal process) without explaining why it is necessary and getting your explicit consent. Sharon Hanton Reflexology will not sell or broker your data.

Retaining Your Data

Sharon Hanton Reflexology will store your personal data for the required length of time to meet legal obligations, as outlined below:

- All records to be held for 8 years
- 'Claims Occurring' Insurance records to be kept for 7 years after last treatment
- Law regarding Children's Records to be kept until the child is 25 years old or if 17 when treated, then 26 years old

After these durations all personal data will be deleted, unless basic information needs to be retained to meet future obligations to you, such as erasure details.

Data Storage

All data is held in the United Kingdom, with the exception of customer emails stored on MailerLite (for the purposes of sending out newsletters and marketing offers) which stores its data in the European Union and is thereby covered by EU data protection laws. Subscribers can manage their subscription preferences and can unsubscribe at any point. You can find out more information here [How MailerLite stays GDPR-compliant - MailerLite](#)

Protecting Your Personal Data

Sharon Hanton Reflexology is committed to ensuring that your personal data is secure. In order to prevent unauthorised access or disclosure, appropriate technical, physical and managerial procedures have been put in place to safeguard and secure the information collected from you. Your data will not be transferred outside the EU without your consent.

Your Rights

At any point whilst Sharon Hanton Reflexology are in possession of, or processing your personal data you have the following rights:

- Right to be informed – you have the right to know how your information will be held and used (this policy notice).
- Right of access – you have the right to request a copy of the information that is held about you.
- Right of rectification – you have a right to correct data held about you that is inaccurate or incomplete.

- Right to be forgotten – you have the right to ask us to erase your personal information in certain circumstances.
- Right to restriction of processing – where certain conditions apply you have a right to restrict the processing of your data.
- Right of portability – you have the right to ask that I transfer the personal information you gave us to another organisation, or to you, in certain circumstances.
- Right to object – you have the right to object to data being used or used for certain purposes.
- You are not required to pay any charges for exercising your rights. If you make a request, I have one month to respond to you.

Please contact us as info@sharonhantonreflexology.co.uk if you wish to make a request. In the event that Sharon Hanton Reflexology refuses your request under rights of access, I will provide you with a reason as to why, which you have the right to legally challenge. At your request Sharon Hanton Reflexology can confirm what information it holds about you and how it is processed.

Full details of your rights can be found at www.ico.org.uk. If you wish to exercise any of these rights, please use the contact details given below. If you are dissatisfied with the response you can complain to the [Information Commissioner's Office](#), using their contact details below.

Sharon Hanton Reflexology's Rights

Whilst in possession of your data, Sharon Hanton Reflexology has the following rights:

- If you don't agree to me (your therapist) keeping records of information about you and your treatments, or if you don't allow me to use the information in the way I need to for treatments, I may not be able to treat you.
- I have to keep your records of treatment for a certain period as described above, which may mean that even if you ask me to erase any details about you, I might have to keep these details until after that period has passed.
- I can move your records between computers and IT systems, as long as your details are protected from being seen by others without your permission.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Sharon Hanton Reflexology you have the right to complain directly to:

Sharon Hanton, Sharon Hanton Reflexology

Bailie, Meikle Wartle, Inverurie, Aberdeenshire AB51 5AA

Email: info@sharonhantonreflexology.co.uk **Tel:** 07976 219083

If you do not get a response within 30 days, you can complain to the:

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Tel: 0303 123 1113 **Website:** www.ico.org.uk