PRIVACY POLICY

1. Important information and who we are

This privacy policy gives you information about how Lauren Haythe Acupuncture & Bodywork Limited collects and uses your personal data, including any data you may provide when you book an appointment, complete the health history intake form and any information shared in the first session and follow up sessions.

This website is not intended for children, and we do not knowingly collect data relating to children.

Controller

Lauren Haythe Acupuncture & Bodywork Limited is the controller and responsible for your personal data (collectively referred to as "we", "us" or "our" in this privacy policy).

If you have any questions about this privacy policy, including any requests to exercise your legal rights (paragraph 9*)*, please contact us using the information set out in the contact details section (paragraph 10).

2. The types of personal data we collect about you

Personal data means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, any previous names, username or similar identifier, marital status, title, date of birth and gender.
- **Special Category Data** includes physical and mental health data, treatment, test results, race, ethnic origin and biometric data.
- **Contact Data** includes billing address, residential address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access this website.
- **Marketing and Communications Data** includes your preferences in receiving any marketing from us and our third parties and your communication preferences.

3. We also collect, use and share aggregated data such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Your interactions with us.** You may give us your personal data by filling in consent forms or by corresponding with us by phone, email or otherwise. This includes personal data you provide when you:
    - book an appointment with us;
    - create an account using our third-party Electronic Health Record platform;
    - subscribe to our newsletter;
    - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.
- **Third parties or publicly available sources.** We will receive personal data about you from analytics providers such as Google based outside the UK and our Electronic Health Record platform provider Jane Software Inc. based outside the UK which only stores your data in the UK.

4. How we use your personal data

Legal basis

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- **Performance of a contract with you:** Where we need to perform the contract we are about to enter into or have entered into with you.
- **Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure patient experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.
- **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to an email newsletter.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use the various categories of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Use	Type of data	Legal basis
To register you as a new patient	(a) Identity (b) Special Category (c) Contact	(a) Performance of a contract with you. (b) Necessary for our legitimate interests (to enter into a contract and devise a treatment plan based on your symptoms and goals).
To provide and deliver our services, including: (a) Providing treatment (b) Manage payments, fees and charges (c) Collect and recover money owed to us (d) Providing appointment reminders	(a) Identity (b) Special Category (c) Contact (d) Financial	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us and provide health care and related services)
To respond to enquiries	(a) Identity (b) Special Category (c) Contact	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to provide health care and related services)
Referral or coordination of care	(a) Identity (b) Special Category (c) Contact	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to provide health care and related services) (c) to disclose to health care providers so that they may provide you with treatment for example to a pharmacy to fill a prescription, to a laboratory to order a test or to a specialist for a consultation
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Dealing with your requests, complaints and queries (c) Providing appointment reminders	(a) Identity (b) Special Category (c) Contact (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and manage our relationship with you)

To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and online advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Marketing and Communications (d) Technical	Necessary for our legitimate interests (to study how patients use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, user relationships and experiences and to measure the effectiveness of our communications and marketing	(a) Technical	Necessary for our legitimate interests (to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To carry out market research through your voluntary participation in surveys		Necessary for our legitimate interests (to study how patients use our products/services and to help us improve and develop our products and services).

Third-party marketing

We will get your express consent before we share your personal data with any third party for their own direct marketing purposes.

5. Cookies

For more information about the cookies we use and how to change your cookie preferences, please see our Cookie Policy.

6. Disclosures of your personal data

We may share your personal data where necessary with the parties set out below for the purposes set out in the table above.

- Specific third parties such as:
    - Health care providers (including those not affiliated with the practice such as pharmacies, laboratories, specialists);

- Health care clearinghouses, anaesthesia care providers;
- Law enforcement officials when required by law;
- Public health authorities, other government bodies;
- Health oversight agencies;
- Judicial or administrative proceedings;
- Specialised government functions;
- Researchers;
- Medical examiners, funeral directors and organ donations;
- Workers' compensation;
- Business associates;
- Personal representatives, friends and family

- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

7. International transfers

We may transfer your personal data to service providers that carry out certain functions on our behalf. This may involve transferring personal data outside the UK to countries which have laws that do not provide the same level of data protection as the UK law. We will only ever make such transfers outside of the UK in accordance with the data protection legislation.

Whenever we transfer your personal data out of the UK to service providers, we ensure a similar degree of protection is afforded to your personal data by ensuring that certain safeguards are in place. For example, we may use specific standard contractual terms approved for use in the UK which give the transferred personal data the same protection as it has in the UK, namely the International Data Transfer Agreement. To obtain a copy of these contractual safeguards, please contact us at: info@laurenhaythe.com.

8. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties

who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our patients (including Contact, Identity, Financial and Transaction Data) for six years after they cease being patients for tax purposes.

In some circumstances you can ask us to delete your data: see paragraph 9 below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

10. Your legal rights

You have a number of rights under data protection laws in relation to your personal data.

You have the right to:

- Request access to your personal data (commonly known as a "subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

- Request erasure of your personal data in certain circumstances. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your

request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.

- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- Withdraw consent at any time where we are relying on consent to process your personal data (see the table in section 4 for details of when we rely on your consent as the legal basis for using your data). However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:

    - If you want us to establish the data's accuracy;

    - Where our use of the data is unlawful but you do not want us to erase it;

    - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or

    - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- Make a complaint directly to us about our handling of your personal data (using the contact details in the ‘Contact details’ section below).

If you wish to exercise any of the rights set out above, please contact us see Contact details (paragraph 11).

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help 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.

We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

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

11. Contact details

If you have any questions about this privacy policy or about the use of your personal data or you want to exercise your privacy rights, please contact us in the following ways:

- Email address: Lauren@laurenhaythe.com
- Telephone number: 07824843660

12. Complaints

You have the right to make a complaint to the Information Commissioner (ICO), the UK regulator for data protection issues (*www.ico.org.uk*). However, before doing so please make sure you have first made your complaint to us or asked us for clarification if there is something you do not understand. Please contact us using the information set out in the contact details section (paragraph 10).

13. Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated on [DATE].

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example a new address or email address.

14. Third-party links

This 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. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.