



## Privacy Notice

Enrich Therapies takes your privacy very seriously and the processing of personal data shall always be in line with the General Data Protection Regulation (GDPR).

This notice is designed to help you understand what kind of information we collect, how we use it, whom we will disclose it to and how you can access, change and remove your information.

If you have any questions about the way your information is being collected or used that has not been answered by this privacy notice or you have any requests to rectify or erase the data, please contact Laura Panaech at [laura@enrichpilates.co.uk](mailto:laura@enrichpilates.co.uk)

### Personal Data we collect and process

Personal data means any information relating to an identified or identifiable natural person ('data subject'). An identifiable natural person is one who can be identified, directly or indirectly by an identification number, location data, online identifier or one or more factors specific to the physical, genetic, mental, economic, cultural or social identity of the natural person.

You (the data subject) may provide us with personal data when completing the contact form on the website, when you contact Enrich Therapies by telephone or email, or where we provide you with paper based forms to fill in.

### Information we receive and transfer from other sources

From time to time, we may need information from third parties who could include GPs, physiotherapists and osteopaths, consultants or other medical professionals. Data subjects will be informed of the purpose. If personal data is to be transferred to another party, then data subjects will be informed before that transfer is made.

### How will we use the information about you?

The information that we collect and store relating to you is primarily used to contact you, to provide our services to you, and to meet our contractual commitments to you.

### Security

The transmission of information via email and other electronic forms of communication may not be encrypted and is not completely secure. We cannot guarantee security, safe receipt or confidentiality and cannot be held liable for any loss or damage which you may suffer as a result of our use of these communication channels. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access.

Sensitive data shall only be transmitted by email with the consent of the data subject. For example clients will often ask for an electronic copy of a GP referral letter.



Please tell us if you do not want us to use email or other electronic forms of communication.

### **Social Media Platforms**

Communication, engagement and actions taken through external social media platforms that Enrich Therapies participate on are subject to the terms and conditions as well as the privacy policies held with each social media platform respectively. We will not ask for any sensitive information through social media platforms and encourage users wishing to discuss sensitive details to contact us by telephone instead.

### **Photos**

We will ask for your consent to post any photos of you on our website or Facebook page and you will be given the option to opt-out or remove any photos displayed.

### **Cookies**

The Enrich Therapies website uses session ID cookies. Cookies are small text files that are placed on your computer or mobile phone when you browse websites. A cookie ID is a unique identifier of the cookie. It consists of a character string through which Internet pages and servers can be assigned to the specific Internet browser in which the cookie was stored. A specific Internet browser can be recognised and identified using the unique cookie ID. Our cookies help to make it easier for users to utilise the website e.g. to minimise load times and save on server processing. Once you close your browser, the cookie terminates and is erased. You can usually switch cookies off by adjusting your browser settings to stop it from accepting cookies. Doing so however will likely limit the functionality of the site.

### **Google Analytics**

Our website also uses Google Analytics to collect statistical information about the number of visitors to our website. This information includes pages visited and content searched. We use this information to analyse what content interests our visitors and to help us improve our website and the services we provide. Further information can be obtained from the Google Privacy Policy. This data will not identify you directly or indirectly. You may disable the Google Analytics function by means of a browser add-on to ensure the prevention of the sending of any analytical information to Google.

### **Data Security - Storage**

All hard copies of personal data shall be stored securely in lockable filing cabinets. All electronic copies of personal data are stored on systems that are password and/or passcode protected.



## **Data Retention**

If the data subject enters into a contract with Enrich Therapies then the consultation notes will be kept for 7 years after the last appointment. In the case of children, records will be kept for 7 years after they reach the age of majority (18). This is a requirement of our Health Professions Insurance Policy.

## **Data Disposal**

All disposal is carried out securely and records will be destroyed so that they are not retrievable.

## **Data Breaches**

We will report any unlawful breach of data as required by the GDPR within 72 hours of the breach occurring, if it is considered that there is an actual, or possibility that data within our control has been compromised.

## **Changes to our Privacy Notice**

This privacy notice may change from time to time in line with legislation or developments of the business. We will not explicitly inform our clients or website users of these changes. Instead we recommend that you check this page [https://www.enrichpilates.co.uk/Privacy\\_notice.pdf](https://www.enrichpilates.co.uk/Privacy_notice.pdf) for policy changes.

Date policy last updated 13/02/2020

## **Your rights**

Individuals are provided with legal rights governing the use of their personal data under the Data Protection Act 2018.

### **1) The right to be informed**

According to GDPR Principles personal data shall be processed lawfully, fairly and in a transparent manner in relation to a data subject.

This privacy notice has been written to help you keep informed about the data we process and your rights.

### **2) The right of access**

Each data subject shall have the right to obtain from the data controller (Laura Panaech) information about his or her personal data stored at any time and a copy of this information, if an individual makes a written request.



We will provide the information within 1 month at no fee (unless repeated or unreasonable requests are made).

The following information shall be provided:

- i. The purposes of the processing of personal data.
- ii. The categories of personal data concerned.
- iii. The recipients or categories of recipients to whom the personal data have been or will be disclosed.
- iv. The envisaged period for which the personal data will be stored.
- v. The rights of rectification or erasure of personal data, or restriction of processing of personal data concerning the data subject, or to object to such processing.
- vi. Details of the subject's right to complain to the Information Commissioner's Office (the supervisory authority under the GDPR)
- vii. Where the personal data are not collected from the data subject, any available information as to their source.
- viii. Any existence of automated decision making.

### **3) The right to rectification**

Each subject has the right to ask us to rectify any inaccurate or incomplete personal data concerning him or her.

We will rectify the personal data in question and inform the data subject of that rectification. The only exception to rectification may be if the information conflicts with a valid medical opinion.

### **4) The right to erasure (to be forgotten)**

Data subjects have the right to ask us to delete personal information from our systems without giving us any reason and at any time.

Subject to certain GDPR exceptions (such as where we have a legal obligation to retain the data or to protect our legitimate interests, we have an obligation to act without undue delay to erase personal data where one of the following grounds applies:

- i. The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.
- ii. The data subject objects to the processing and there are no overriding legitimate grounds for the processing.
- iii. The data subject wishes to withdraw their consent to us holding and processing their personal data.
- iv. The personal data have been unlawfully processed.
- v. The personal data needs to be erased in order for us to comply with a particular legal obligation.



### **5) The right of restriction of Processing**

Data subjects may be entitled to limit the purposes for which we can process the data where one of the following applies:

- i. The accuracy of the data is contested by the data subject.
- ii. Processing is unlawful and the data subject requests restriction instead of erasure.
- iii. Data is no longer needed by the controller but the data subject needs it for the establishment, exercise or defence of legal claims.

### **6) The right to Data Portability**

Data subjects have the right to transfer their personal data between controllers without hindrance from us.

### **7) The right to object to processing**

We will only process data where we can demonstrate lawful grounds for doing so.

We are obliged to consider the request to any objection to process personal data. Enrich Therapies shall no longer process the personal data in the event of an objection unless we can demonstrate legitimate grounds for the processing.

If the data subject objects to us processing information for direct marketing then we will no longer process personal data for these purposes.

### **8) Right not to be subject to decisions based on automated processing**

We do not use any automated processing that results in any automated decision based on a data subject's personal information.

### **9) Right to lodge a complaint with a supervisory authority**

We hope that we can resolve any query or concern you may raise about our use of your information. If you wish to complain about how we have collected or handled your data please contact Laura Panaech at [laura@enrichpilates.co.uk](mailto:laura@enrichpilates.co.uk). We will investigate your complaint, but if you are not satisfied with our response or believe we are processing your personal Information unlawfully, you can complain to the UK Information Commissioner's office. Further information is available on the ICO website or telephone 0303 123 1113