

Privacy Notice

This Privacy Notice is issued in order to provide you, whether you, the client, or other individual about whom we control data, with information about what data we hold and process and what we do with that data.

If you have any questions, queries or require any further information, please do not hesitate to get in touch with us. Our full contact details are below.



Who We Are

Laura Silverman Massage Therapist trading as Talk, Touch, Heal (referred to hereafter as We or Us)



How To Contact Us

50 High Street
Market Lavington
Devizes
Wiltshire
SN10 4AG
T – 07962 403855
E-Mail laura@laurasilverman.co.uk



What is Personal Data

Personal data is any information that may identify a living individual.



What Data We Hold

For the purposes of the General Data Protection Regulations (GDPR) and the Data Protection Act 2018, we are Controllers.

Our Clients

We collect personal information such as name, contact details, medical conditions, confirmation of covid form, marketing preference.

We may also obtain personal data from Hotspring Ventures Limited, trading as Treatwell who operate the online booking platform we use. The only data we receive via the Treatwell platform will be the data you input; no additional data is provided to us. Hotspring Ventures Limited are data controllers and we are not responsible for how they process your personal data. If you would like to know more about how Hotspring Ventures Limited process your data, please refer to their privacy notice.

The types of data we process will vary between our clients and may include detailed data about our clients' medical history, including personal data about their lifestyle. We may record full names, contact details, and associated personal data. See the table below for our retention periods on the data held.

Our Suppliers

We will collect your name, and contact information, which may include an E-Mail address.



Special Category Data

Special category data includes information about criminal convictions, race or ethnic origin, political or religious beliefs, health, genetic or biometric data, sex life and sexual orientation, trade union membership and philosophical beliefs of an individual.

When processing special category data, we will do so with the utmost care and process the data in strict accordance with the legal requirements.

Where necessary, the express consent of the data subject will be obtained permitting us to process such data. See the table below for our retention periods on the data held.



What We Do With Your Data

All the data we hold will be processed for the purposes of providing our services to our clients.

In addition, this data may be used for our own general business purposes to facilitate:

- Administration of our clients' accounts
- Billing and debt collection
- Advertising and marketing (where necessary your consent to receive marketing will be obtained)
- Management information necessary to assess how we are performing as a business and client satisfaction with our services
- Health and safety requirements to ensure the safety and security of our people and premises
- Disclosure of information to our own professional and legal advisors



Our Lawful Basis For Processing Your Data

It is a requirement of the General Data Protection Regulations that data is processed only when there is a lawful basis for doing so.

Laura Silverman Massage Therapist's legal basis for processing data will include one or more of the following:

- the processing of data is necessary for the performance of a contract to which you are a party or when taking steps in order to enter into a contract at your request
- processing is necessary for our compliance with our legal obligations
- processing is necessary for the purposes of pursuing our legitimate interest (including carrying out our business of providing our services)
- the processing is necessary for the establishment, exercise or defence of legal claims
- Additionally, in some circumstances we may process personal data on the basis that an individual has provided their express consent, for example, for marketing to an individual by email or SMS or for the processing of special category data.

Please note that consent provided by an individual may be withdrawn by that individual at any time by contacting us using the contact details above.



Direct Marketing

We may wish to send marketing materials to you on the basis of our legitimate interests or, where necessary, having obtained the consent of the individual concerned, provided it is permissible for us to do so by law. It is the right of individuals to opt-out of or unsubscribe from any marketing material. Full details of how this can be done will be included within each marketing communication. You may also opt-out by contacting us at the above address.



Sharing Your Data

In order to provide our services to you and comply with our legal obligations, it may be necessary for us to share the personal data we hold, insofar as we are obliged or allowed by law to do so, with third parties including the following:

- suppliers and service providers used by us in order to deliver our services to you. This may include, sub-contracted therapists providing services on our behalf, document storage facilities, IT service providers such as cloud providers of software, data room providers and providers of our IT servers
- our own legal and other professional advisors
- government agencies, regulators, the police/law enforcement agencies and other authorities



Who Your Data Is Shared With

The personal data we hold will only be shared with such third parties as are necessary for the provision of our services to you e.g. sub-contractors and in order that we may meet all legal obligations placed upon us, such as, and not limited to, insurers and third parties associated with claims handling.

With your consent, we may also share your personal data with anyone you have authorised to deal with us on your behalf.



Sharing Your Data Outside The UK

Data we collect may be transferred to, and stored at, a country outside of the European Economic Area (EEA). This means it might also be processed by staff operating outside of the EEA who work for one of our suppliers.

Where information is provided to a Third Party, either in or outside the EEA, we will ensure that it and any of its agents and/or suppliers take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Fair Processing Notice.



Where Your Data Is Stored

Data we collect will be stored on manual files, which are kept in a locked cabinet in a secure room, on our premises listed on page 1 of this document. Data will also be stored on our computers, hard drive, secure mobile phone, and secure mobile phone of a sub-contractor. For the purpose of making a booking via the Treatwell platform, the data collected via this method will be stored on the Treatwell Server, please refer to Treatwell's privacy notice for further information.

Retention of Data

In line with the requirements of GDPR we will retain any personal data we hold for no longer than is necessary for the purpose for which it was provided unless we are required by law, unless we have another legitimate reason to keep it for longer (for example if necessary for any legal proceedings).

The data retention periods are outlined below. These will depend on the nature of the data and the relationship with the individual involved.

Categories of Individuals	Data collected	Data Retention Period	Where it is Stored
Clients who booked via Treatwell platform	Name, E-Mail, address, phone number, marketing preference, confirmation of covid form, medical conditions.	7 years (Please refer to Treatwell's privacy notice for details of their retention period)	Backed up to external hard drive, some manual files. No cloud used. (Please refer to Treatwell's privacy notice for details of their data storage arrangements)
Clients who booked via website or direct	Name, E-Mail, address, phone number, marketing preference, confirmation of covid form, medical conditions.	7 years (Please refer to Treatwell's privacy notice for details of their retention period)	Backed up to external hard drive, some manual files. No cloud used. Added to Treatwell's calendar. (Please refer to Treatwell's privacy notice for details of their data storage arrangements)
Clients and staff of Corporate clients	Name, E-Mail, address, phone number marketing preference, confirmation of covid form, medical conditions	7 years	Backed up to external hard drive, some manual files. No cloud used.
Clients under the age of 18	Name, E-Mail, address, phone number marketing preference, confirmation of covid form, medical conditions	7 years from the date they turn 18	Backed up to external hard drive, some manual files. No cloud used.
Marketing	Name, E-Mail, telephone number.	2 years – unless ongoing consent is obtained from data subject	Backed up to external hard drive, some manual files. No cloud used.
Suppliers	Name, E-Mail, telephone number.	7 years	Backed up to external hard drive, some manual files. No cloud used.

In general, this will mean that data will be retained during the business relationship between Us and our client and for a period of up to seven years once the relationship ceases.

We will keep employee data for a period of seven years after termination of employment.



Your Data Protection Rights

The data protection regulations and UK law seeks to protect your rights as follows:

- **The right to be informed** about our data processing activities, including through Privacy Notices such as this.
- **The right of access** to the personal information we hold about you. To request a copy of this information you must make a subject access request by contacting us.
- **The right of rectification.** You may ask us to correct any inaccurate or incomplete data within one month.
- **The right to erasure and to restrict processing.** You have the right to have your personal data erased and to prevent processing except where we have a legal obligation to process your personal information. You should bear in mind that by exercising this right you may hinder or prevent our ability to provide products and services.
- **The right to data portability.** On your request, we will provide you with your personal data in a structured format.
- **The right to object.** You have particular rights in relation to automated decision making and profiling to reduce the risk that a potentially damaging decision is taken without human intervention. You can object to your personal data being used for profiling, direct marketing or research purposes.

You may invoke any of these rights at any time by contacting us on the details given at the beginning of this Privacy Notice.



Complaints

In addition to the rights listed above, any person about whom we hold personal data, also known as data subjects have the right to make a complaint to the Information Commissioner with regard to our processing of their personal data or any breach of their rights.

Information of how you can complain can be found at:

Laura Silverman Massage Therapist
50 High Street
Market Lavington
Devizes
Wiltshire
SN10 4AG
T - 07962 403855
E – laura@laurasilverman.co.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 or www.ico.org.uk/for-the-public/



Our Website & Cookies

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- understanding what brought you to our website and what pages you visited
- remembering you when you return to our website
- providing you with safe restricted access areas

If you wish to change or manage Cookies, this can be done by changing your browser settings to delete or block cookies.

However, if you chose to block all Cookies, this may result in you being unable to fully access and enjoy our website.