

Hand to Heal (Reflexology)

PRIVACY POLICY

This version dated 10 April 2018

1. **This document** is HAND TO HEAL's official privacy policy and applies to all personal information collected by HAND TO HEAL. In this document we explain how and why we collect your personal information, how we use it, and what controls you have over our use of it.
2. HAND TO HEAL is committed to complying with the **General Data Protection Regulation** (GDPR), a set of UK regulations in force from the end May 2018 governing how businesses must control the way they collect and use personal information. The regulations are designed to protect and safeguard your privacy when you deal with service providers.
3. **HAND TO HEAL will never disclose your personal information to any third party unless we have your permission to do so, or as is otherwise required under section 10 of this Privacy Policy notice.**

Collection of information

4. Some information provided to us by clients, customers, contractors and other third parties may be considered private or personal. For example these may include your address, email address, IP address, phone number, date of birth, medical history and any medications which you take. Without these details we would not be able to provide our services to you.
5. HAND TO HEAL will only collect such personal information if it is necessary for the delivery of one of our functions e.g. the planning and delivery of Reflexology treatments, or keeping in touch about your Reflexology appointments.
6. HAND TO HEAL collects personal information from people under the following situations:
 - a) If you contact HAND TO HEAL, we may keep a record of that correspondence.
 - b) When you enter your contact details via our website, on our appointment scheduling service, or via on social media platforms.
 - c) Information collected at your first appointment when you complete a Confidential Health Questionnaire.
 - d) Information you provide verbally at appointments when we discuss your health and well-being. Relevant details are recorded (in brief) on your clinic records, along with drawings showing visual and tactile reflexology indications from your feet (or hands).
7. At or before the time personal information is collected by us we will take reasonable steps to ensure that you are made aware of the purpose of personal information collection and any arrangements in place with 3rd party organisations that HAND TO HEAL shares the information collected about you.
8. Via this privacy policy and in documentation you sign when you first enrol as a client for Reflexology we will also make you aware of the laws HAND TO HEAL complies with requiring the collection of personal data, how you can appeal if you think there is a breach in how your personal data is stored or used, and also the fact that you are

lawfully permitted to gain access to the information held about you. We will also discuss the consequences if you decide not to supply all or part of the personal information requested by HAND TO HEAL.

Use of information collected and disclosure of personal information to others

9. We only use personal information held about an individual for the primary purpose for which it is collected (e.g. provision of our services, including administration, notification to you about changes to our services, record-keeping, accessing archived records to delete them once the statutory storage period expires, and technical maintenance). We may also use such information for a purpose related to the primary purpose of collection and where it would reasonably be expected by you that we would use the information in such a way. This information is only disclosed to persons outside our business in the circumstances set out in this policy or as otherwise notified to you at the time of collection of the information.
10. In addition, we are permitted to use or disclose personal information held about you:
 - Where you have consented to the use or disclosure
 - Where we reasonably believe that the use or disclosure is necessary to lessen or prevent a serious, immediate threat to someone's health or safety or the public's health or safety
 - Where we reasonably suspect that unlawful activity has been, is being or may be engaged in and the use or disclosure is a necessary part of our investigation or in reporting the matter to the relevant authorities
 - Where such use or disclosure is required under or authorised by law (for example, to comply with a subpoena, a warrant or other order of a court or legal process)
 - Where we reasonably believe that the use or disclosure is reasonably necessary for prevention, investigation, prosecution and punishment of crimes or wrongdoings or the preparation for, conduct of, proceedings before any court or tribunal or the implementation of the orders of a court or tribunal by or on behalf of an enforcement body.

Links and 'Cookies'

11. Our web site contains links to other web sites and these third-party organisations may collect personal information about you. We are not responsible for the privacy practices of other businesses or the content of web sites that are linked to our web site. HAND TO HEAL encourages users to be aware when they are leaving the HAND TO HEAL site and to read the privacy statements of each and every web site that collects personally identifiable information.
12. Not with-standing the above, HAND TO HEAL has taken reasonable steps to satisfy itself that all the third party contractors used by HAND TO HEAL comply with the GDPR in the way they gather, store, processes and use personal data.
13. HAND TO HEAL utilises **Acuity Ltd.** for online appointment scheduling and appointment recording services. Their privacy statement can be accessed here : [Acuity Privacy Policy](#).
14. HAND TO HEAL uses both [Paypal](#) and [SumUp](#) for payment handling services. The privacy policies for these third party providers can be viewed by visiting their web sites (click on the company name to be taken to their website).
15. HAND TO HEAL collects information from its website using "IP files".

16. When you visit the HAND TO HEAL website to read, browse or download information, our system will record/log your IP address (the address which identifies your computer on the internet and which is automatically recognised by our web server), date and time of your visit to our site, the pages viewed and any information downloaded. This information will only be used for the purpose of site analysis and to help us offer you improved online service. The systems we use may automatically collect non-personal information about you such as the type of Internet browsers you use or the site from which you linked to our website. You cannot be identified from this information and it is only used to assist us in providing an effective service on our website.

Security and storage

17. HAND TO HEAL places significant importance on the security of all information associated with its clients. We have security measures in place to protect against the loss, misuse and alteration of personal information under our control.
18. HAND TO HEAL retains the information you provide to us including your contact details to enable us to verify transactions and customer details and to retain adequate records for insurance, legal and accounting purposes.
19. It is the responsibility of HAND TO HEAL to ensure all stored information is accurate, therefore please notify us if any of your personal information, including contact details or health conditions change during the time you are an active client with us.
20. Please note that all paper versions of client records (e.g. Confidential Health Questionnaire) are personally and immediately transferred by HAND TO HEAL to secure electronic format with the paper version being safely and securely destroyed.
21. Information, when in electronic format, is held on secure servers in controlled facilities. Information stored within HAND TO HEAL computer systems can only be accessed by HAND TO HEAL. Relevant computer network password protections are in place to prevent unauthorised access to data in the event of computer theft.
22. HAND TO HEAL has taken steps to research and assure itself that the on-line 'Cloud' file management system it uses – Microsoft's One Drive – is GDPR compliant in the way that it stores, encrypts and limits access to data on its servers and that the servers are located in GDPR compliant geographies.
23. No data transmission over the Internet can be guaranteed to be 100 per cent secure. As a result, while we strive to protect user's personal information, HAND TO HEAL cannot ensure or warrant the security of any information transmitted to it or from its online products or services, and users do so at their own risk. Once HAND TO HEAL receives your transmission, it makes every effort to ensure its security on its systems.
24. Ultimately, you are solely responsible for keeping your passwords and/or account information secret. You should be careful and responsible whenever you are online.

Access to and correction of personal information

25. HAND TO HEAL is committed to maintaining accurate, timely, relevant and appropriate information about our customers and web-site users.
26. Any member of the public has a right under the GDPR to request to access or edit the personal information held about them. Providing your request is in accordance with the General Data Protection Regulation (GDPR), then HAND TO HEAL will give you access to that information in a timely manner. No charge will be made unless you request specialist courier services to transfer the information to you e.g. Royal Mail Recorded Delivery, these costs will be charged as they are incurred. To ensure

confidentiality, details of your personal information will be passed on to you only if we are satisfied that the information we hold relates solely to you.

27. In the event that you request that personal information about you is edited or amended, this will be acted on by HAND TO HEAL only if the information previously held was incomplete or inaccurate. Information will be corrected upon receiving advice to this effect from you.
28. If we refuse to provide you with access or to correct the personal information held about you, then we will provide reasons for such refusal.

Retention of personal information

29. HAND TO HEAL holds Professional Liability and Malpractice Insurance through BALENS specialist insurance brokers who are a member of the Zurich Insurance plc group. A condition of this insurance is that client records should be kept for a minimum of seven years from the date of the last treatment.
30. HAND TO HEAL is a member of the [Approved Registered of the Complementary & Natural Healthcare Council](#) (CNHC). The CNHC requires its members to retain client records for eight years from the date of the client's last visit for services.
31. The 'eight years' requirement is in line with those that cover general NHS hospital records and other forms of health records. The reason for this is to make sure that clients can have access to their recent health records in the event they wish to look in to their health history. *N.B. CNHC do however state that in most cases the statute of limitation that applies for late discovered situations leading to an allegation of negligence is between 3 and 6 years from the date of discovering a problem.*
32. Accordingly, to comply with requirements of its insurers and the CNHC, HAND TO HEAL retains personal information for a period of 8 years from the date of a client's last treatment.

Complaints and data breaches

33. If you have a complaint about this Privacy Policy or the collection, use or safe disposal or destruction of your personal information, your complaint should be directed in the first instance to us at e-mail: jane@handtoheal.com or by post to Hand to Heal, 5 Albert Crescent, Penarth, CF64 1DA. We will acknowledge receipt of your complaint within 48 hours of receiving it.
34. We will investigate your complaint and attempt to resolve any breach that might have occurred in relation to the collection, use or destruction of personal information held by us about you in accordance with the General Data Protection Regulation (GDPR). If you are not satisfied with the outcome of this procedure, then you may request that an independent person (usually the Information Commissioner's Office) investigate your complaint.

Changes to Privacy Policy

35. If and when HAND TO HEAL changes its Privacy Policy, it will post changes on this Privacy Policy page on its website so that users are always aware of what information is collected, how it is used and the way in which information may be disclosed. As a result, please remember to refer back to this Privacy Policy regularly to review any amendments.

Contacting us

36. If you require further information regarding HAND TO HEAL'S Privacy Policy, please contact us at the following address: E-mail : jane@handtoheal.com
37. Should you wish to read more information on privacy legislation or the General Data Protection Regulation (GDPR) we recommend that you visit the Information Commissioner's Office at <https://ico.org.uk/>.

Acceptance

38. Clients who enter into service with HAND TO HEAL by making a booking and attending for Reflexology treatments will be requested to sign an abbreviated version of this Policy Policy to indicate their understanding and acceptance of its contents.

Jane Lorimer. Hand to Heal (Reflexology)
Date : 12 April 2018
HAND TO HEAL'S Privacy Policy is based on a template provided by Professional Reflexology (Association of Professional Reflexologists).