

Lynne Firth Sport Massage

PRIVACY NOTICE FOR CLIENTS

I am committed to respecting your privacy. This notice is to explain how I may use any personal information that I collect before, during and after your consultation with me. This notice applies to you if you have registered to become or are a client of Lynne Firth Sport Massage. This notice explains how I comply with the law on data protection, what your rights are and for the purposes of data protection I will be the controller of any of your personal information.

References to I, or me in this privacy notice are to Lynne Firth Sport Massage.

I have not appointed a Data Protection Officer to oversee my compliance with data protection laws as I am not required to do so, but I will act as Data Protection Compliance Manager and have overall responsibility for data protection compliance in the organisation. Contact details are set out in the "Contacting me" section at the end of this privacy notice.

1. PERSONAL INFORMATION I MAY COLLECT FROM YOU

Depending on the type of consultation that undertake, you may initially provide me with or I may obtain **personal information** about you, such as information regarding your:

- personal contact details that allows me to contact you directly such as name, title, email addresses and telephone numbers;
- date of birth;
- gender;
- records of your interactions with me such as telephone conversations, emails and other correspondence and your instructions to me;
- use of and movements through my online portal, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information;
- records of your consultations, assessments and treatments with me;
- images in video and/or photographic form and voice recordings;
- details of next of kin, family members, and emergency contacts;

2. SPECIAL CATEGORIES OF PERSONAL INFORMATION

I may also collect, store and use the following "**special categories**" of more sensitive personal information regarding you:

- information about your race or ethnicity;
- information about your health, including any medical condition, health and sickness records, medical records and health professional information.

I may not collect all the above types of special category personal information about you. In relation to the special category personal data that I process I do so on the basis that

- the processing is necessary for reasons of substantial public interest, on a lawful basis;
- it is necessary for the establishment, exercise or defence of legal claims;
- it is necessary for the purposes of carrying out the obligations and exercising mine or your rights in the field of employment and social security and social protection law; or
- based on your explicit consent.

In the table below I refer to these as the "special category reasons for processing of your personal data".

3. WHERE I COLLECT YOUR INFORMATION

I collect personal information about my clients when you apply to have a treatment, when you purchase any services or products I offer, when you make a query and/or complaint or when you correspond with me by phone, e-mail or in some other way.

If you are providing me with next of kin, beneficiaries, family members and emergency contacts they have a right to know and to be aware of how what personal information I hold about them, how I collect it and how I use and may share that information. Please share this privacy notice with those of them whom you feel are

sufficiently mature to understand it. They also have the same rights as set out in the “**Your rights in relation to personal information**” section below.

4. USES MADE OF THE INFORMATION

The table below outlines the main purposes for which I process your personal information, the categories of your information involved and my lawful basis for being able to do this.

Purpose	Personal information used	Lawful basis
To administer any treatment, you have with me and managing my relationship with you, including dealing with payments and any support, service or product enquiries made by you	All contact and treatment details, transaction and payment information, records of your interactions with me, and marketing preferences.	This is necessary to enable me to properly manage and administer your treatment contract with me.
To arrange and manage any contracts for the provision of any services or products	Contact details, transaction and payment information. Records of your interactions with me.	This is necessary to enable me to properly administer and perform any contract for the provision of any services and products you have purchased from me.
To send you information which is included treatment package, including details about events, partner offers and discounts and updates on injury treatment.	Contact and treatment details.	This is necessary to enable me to properly manage and administer your treatment contract with me.
To send you other marketing information I think you might find useful or which you have requested from me, including newsletters, information about treatment, exercises, events, products and information about partners.	Contact details and marketing preferences.	Where you have given me your explicit consent to do so.
To answer your queries or complaints.	Contact details and records of your interactions with me	I have a legitimate interest to provide complaint handling services to you in case there are any issues with your treatment.
Retention of records.	All the personal information I collect.	I have a legitimate interest in retaining records whilst they may be required in relation to complaints, claims and for statistical analysis. I need to retain records to properly administer and manage your treatment and in some cases I may have legal or regulatory obligations to retain records. I process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.

The security of my IT systems.	Your usage of IT systems and online portals.	I have a legitimate interest to ensure that my IT systems are secure.
To conduct data analytics studies to better understand event attendance and trends within the treatment course.	Records of attendance at any events or hosted by myself.	I have a legitimate interest in doing so to ensure that clients information is targeted and relevant.
For the purposes of promoting the organisation.	Images in video and/or photographic form.	Where you have given me your explicit consent to do so.
To comply with health and safety requirements.	Records of attendance, and medical information about your health.	I have a legal obligation and a legitimate interest to provide you and other clients of my organisation with a safe environment in which to participate in treatment. I process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above.
To administer your attendance at any programmes that you sign up to.	All contact, transaction and payment data.	This is necessary to enable me to register you on to and properly manage and administer your attendance during treatment and/or programme.
To use information about your physical or mental health (including any injuries) or disability status, to ensure your health and safety and to assess your fitness to participate in any treatment	Health and medical information	I process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above.
For the purposes of equal opportunities monitoring.	Name, title, date of birth gender, information about your race or ethnicity and health and medical information	I have a legitimate interest to promote a sport massage environment that is inclusive, fair and accessible. I process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above.
I may need to contact your GP with your consent to help me with future treatments	Contact details, date of birth, health status	I have a legitimate interest to promote a treatment programme that is inclusive, fair and effective. I process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above.

For some of your personal information you will have a legal, contractual or other requirement or obligation for you to provide me with your personal information. If you do not provide me with the requested personal information I may not be able to admit you as a client or I may not be able to properly perform my contract with you or comply with legal obligations and I may have to terminate your treatment. For other personal information you may not be under an obligation to provide it to me, but if you do not provide it then I may not be able to properly perform my contract with you.

Where you have given me your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting me as described in the "Contacting me" section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and I may still be entitled to hold and process the relevant personal information to the extent that I am entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example I may no longer be able to provide certain treatment programmes to you.

5. **DIRECT MARKETING**

Email, post and SMS marketing: from time to time, I may contact you by email, post or SMS with information about products and services I believe you may be interested in.

You can also unsubscribe from my marketing by clicking on the unsubscribe link in the marketing messages I send to you.

6. **DISCLOSURE OF YOUR PERSONAL INFORMATION**

I share personal information with the following parties:

- **Any party approved by you.**
- **Partners;** such as your GP.
- **The Government or my regulators:** where I am required to do so by law or to assist with their investigations or initiatives.
- **Police, law enforcement and security services:** to assist with the investigation and prevention of crime and the protection of national security.

7. **TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY**

The personal information I collect is not transferred to or stored in countries outside of the UK and the European Union.

8. **HOW LONG DO I KEEP PERSONAL INFORMATION FOR?**

The duration for which I retain your personal information will differ depending on the type of information and the reason why I collected it from you. However, in some cases personal information may be retained on a long-term basis: for example, personal information that I need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement I will retain all physical and electronic records for a period of 7 years after your last contact with me or the end of your treatment programme. Exceptions to this rule are:

- Information that may be relevant to personal injury or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after the event.

It is important to ensure that the personal information I hold about you is accurate and up-to-date, and you should let me know if anything changes, for example if you change your phone number or email address. To update the personal information I hold about you, you can contact me by using the details set out in the "**Contacting me**" section below.

9. **YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION**

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information I hold about you;
- the right to request the correction of inaccurate personal information I hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;

- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that I transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to require me to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by me. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact me by using the details set out in the "Contacting me" section below.

If you are unhappy with the way I am using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator. I am here to help and encourage you to contact me to resolve your complaint first.

10. **CHANGES TO THIS NOTICE**

I may update this privacy notice from time to time. When I change this notice in a material way, I will update the version date at the bottom of this page. For significant changes to this notice I will try to give you reasonable notice unless I am prevented from doing so. Where required by law I will seek your consent to changes in the way I use your personal information.

11. **CONTACTING ME**

In the event of any query or complaint in connection with the information I hold about you, please email lynne@lfsportmassage.co.uk or write to me, Lynne Firth at 28 Laverstoke Lane, Laverstoke, Nr Whitechurch, Hants. RG28 7NY.

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