

PRIVACY POLICY AND DATA PROTECTION (GDPR)

This privacy policy sets out how I, Susan Janikowski, herbalist, Arvigo practitioner and reflexologist at Flourish Naturally, collect, use and protect any personal data you provide via the website, by phone, email or consultation form.

PERSONAL DATA COLLECTED

- For the purpose of providing treatment I will collect information necessary for your treatment. When you visit my practice, I will take notes regarding your health history and medications and other issues affecting your health. This data will be held securely and will not be shared with anyone not involved in your treatment. In order to process your personal data it is a condition of any treatment that you give your explicit consent to allow me to document and process your personal medical data. Contact details provided by you such as telephone numbers, email addresses and postal address may be used to remind you of future appointments and provide you with reports and other information concerning your treatment.
- For marketing purposes, I may also use the contact details provided by you to respond to your enquiries, including making telephone contact and emailing information to you which the practice believes may be of interest to you.
- In making initial contact with my practice you consent to me maintaining a marketing dialogue with you until you either opt out (which you can do at any time). I do not broker your data and you can ask to be removed from our marketing database by emailing or phoning the practice using the contact details provided at the end of this Privacy Notice.
- Some basic personal data may be collected about you from the marketing forms and surveys you complete, from records of our correspondence and phone calls and details of your visits to our website, including but not limited to, personally identifying information like Internet Protocol (IP) addresses.
- I will only collect the information needed so that we can provide you with the services you require, the business does not sell or broker your data.

LEGAL BASIS FOR PROCESSING ANY PERSONAL DATA

To meet our contractual obligations obtained from explicit Patient Consent and legitimate interest to respond to enquiries concerning the services provided.

Legitimate interests:

- my requirement to retain the information in order to provide you with the best possible treatment options and advice.
- To process and accurately deliver any orders or services from this website or from my clinic.
- To arrange appointments, bookings, workshops and events.

CONSENT

Through agreeing to this privacy notice you are consenting to me processing your personal data for the purposes outlined. You can withdraw consent at any time by using the postal, email address or telephone number provided at the end of this Privacy Notice.

DISCLOSURE

I will keep your personal information safe and secure. I will not disclose your Personal Information unless compelled to, in order to meet legal obligations, regulations or valid governmental requests. My practice may also enforce its Terms and Conditions, including investigating potential violations of

its Terms and Conditions to detect, prevent or mitigate fraud or security or technical issues; or to protect against imminent harm to the rights, property or safety of its staff.

RETENTION POLICY

I will process personal data during the duration of any treatment and will continue to store only the personal data needed for seven years after the contract has expired to meet any legal obligations. After eight years all personal data will be deleted, unless basic information needs to be retained by us to meet our future obligations to you, such as erasure details. Records concerning minors (under 16), who have received treatment, will be retained until the child has reached the age of 25.

DATA STORAGE

All written Data is held in the United Kingdom. I do not store personal data outside the EEA. Data is kept securely in a locked space and can only be accessed by myself. An online database has been set up for the purposes of emailing newsletters and informing you of relevant offers and changes in practice.

CONSENT

By agreeing to this privacy policy notice you are consenting to me processing your personal data for the purposes outlined. You can withdraw consent at any time by using the postal, email address or telephone number provided at the end of the Privacy Policy.

YOUR RIGHTS AS A DATA SUBJECT

At any point whilst I am in possession of, or processing your personal data, all data subjects have the following rights:

- Right of access – you have the right to request a copy of the information that I hold about you.
- Right of rectification – you have a right to correct data that I hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data I hold about you to be erased from the records.
- Right to restriction of processing – where certain conditions apply you have a right to restrict the processing.
- Right of portability – you have the right to have the data I hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right not to be subject to the legal effects of automated processing or profiling.

In the event that I refuse your request under rights of access, I will provide you with a reason as to why, which you have the right to legally challenge. At your request I can confirm what information holds about you and how it is processed.

You can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.

- If the processing is based on the legitimate interests of the herbalist and information about these interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- How long the data will be stored.
- Details of your rights to correct, erasure, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority (ICO).
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

To access what personal data is held, identification will be required

I will accept the following forms of identification (ID) when information on your personal data is requested: a copy of your driving license, passport, birth certificate and a utility bill not older than three months. A minimum of one piece of photographic ID listed above and a supporting document is required. If the herbalist is dissatisfied with the quality, further information may be sought before personal data can be released. All requests should be made to me at the email and phone number provided at the end of the policy.

COMPLAINTS

In the event that you wish to make a complaint about how your personal data is being processed by me, you have the right to complain. If you do not get a response within 30 days, you can complain to the ICO. The details for each of these contacts are:

Susan Janikowski

www.flourishnaturally.co.uk / email: susan@flourishnaturally.co.uk / phone: 07769562719

Telephone **03031231113** or email: <https://ico.org.uk/global/contact-us/email/>

GDPR Patient Explicit Consent Data Protection Agreement