

# **Customer Privacy Notice**

This privacy notice tells you what to expect me to do with your personal information.

- What information I collect, use, and why
- Lawful bases and data protection rights
- Where I get personal information from
- How long I keep information
- Who I share information with
- How to complain

# What information I collect, use, and why

I collect or use the following information to **provide and improve products and services for clients**:

- Names and contact details
- Addresses
- Gender
- Occupation
- Date of birth
- Health information (such as medical information or health conditions)
- Records of sessions and decisions

I also collect or use the following special category information to **provide and improve products and services for clients.** This information is subject to additional protection due to its sensitive nature:

- Health information
- I collect or use the following personal information for the **operation of client accounts**:
- Names and contact details
- Addresses

I also collect or use the following special category information for the **operation of client or customer accounts.** This information is subject to additional protection due to its sensitive nature:

• Health information



I collect or use the following personal information to **protect client welfare**:

- Names and contact information
- Health and wellbeing information
- Emergency contact details

I also collect or use the following special category information to **protect client welfare.** This information is subject to additional protection due to its sensitive nature:

Health information

# Lawful bases and data protection rights

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO's website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

- Your right of access You have the right to ask us for copies of your
  personal information. You can request other information such as details
  about where we get personal information from and who we share
  personal information with. There are some exemptions which means you
  may not receive all the information you ask for. Read more about the
  right of access.
- Your right to rectification You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. Read more about the right to rectification.
- **Your right to erasure** You have the right to ask us to delete your personal information. Read more about the right to erasure.
- Your right to restriction of processing You have the right to ask us to limit how we can use your personal information. Read more about the right to restriction of processing.



- Your right to object to processing You have the right to object to the
  processing of your personal data. Read more about the right to object to
  processing.
- Your right to data portability You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. Read more about the right to data portability.
- Your right to withdraw consent When we use consent as our lawful basis you have the right to withdraw your consent at any time. Read more about the right to withdraw consent.

If you make a request, I must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact me using the contact details in the footer of this privacy notice.

## Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide and improve products and services for clients** are:

- Consent I have permission from you after I gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract I have to collect or use the information so I can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legitimate interests I'm collecting or using your information because it benefits you, my organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. My legitimate interests are:
  - Retaining information in relation to health conditions, injuries and medication to be used to reduce the risk of injury, and to enable adaptation to your training where necessary to enable you to train safely and effectively.



For more information on my use of legitimate interests as a lawful basis you can contact me using the contact details in the footer of this privacy.

Vital interests – collecting or using the information is needed when someone's
physical or mental health or wellbeing is at urgent or serious risk. This includes
an urgent need for life sustaining food, water, clothing or shelter. All of your
data protection rights may apply, except the right to object and the right to
portability.

Our lawful bases for collecting or using personal information for the **operation of client accounts** are:

- Consent I have permission from you after I gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract I have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legitimate interests I'm collecting or using your information because it benefits you, my organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
  - Retaining information in relation to health conditions, injuries and medication to be used to reduce the risk of injury, and to enable adaptation to your training where necessary to enable you to train safely and effectively.

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data protection rights may apply, except the right to object and the right to
portability.

Our lawful bases for collecting or using personal information to **protect client welfare** are:

• Consent - I have permission from you after I gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.



- Legitimate interests I'm collecting or using your information because it benefits you, my organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
  - Retaining information in relation to health conditions, injuries and medication to be used to reduce the risk of injury, and to enable adaptation to your training where necessary to enable you to train safely and effectively.

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data protection rights may apply, except the right to object and the right to
portability.

### Where we get personal information from

Directly from you

### How long we keep information

- Personal contact details including emails and telephone numbers will be retained for 6 years. Unless you are subscribed to mailing lists and news letters which you will need to unsubscribe to.
- Emails and correspondence will be retained for 6 years.
- Personal details relating to your health and medical will be retained for 6 year from your last session.
- Any training plans will be retained for 6 year from your last session or from 6 year from when the training plan was written for you, whichever is the later.
- Invoices and receipts of payment will be retained for 6 years.

For more information on how long I store your personal information or the criteria I use to determine this please contact us using the details provided in the footer of this privacy policy.



#### Who we share information with

### Others we share personal information with

• Emergency services – if needed we will share your details along with the details you supplied as your next of kin.

## How to complain

If you have any concerns about my use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

#### The ICO's address:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Helpline number: 0303 123 1113

Website: https://www.ico.org.uk/make-a-complaint