



Thrive Wellness Edinburgh

Privacy Notice

At Thrive Wellness Edinburgh, we take your data privacy seriously. In order to provide you with our services we collect and use personal data which means that we are a 'Data Controller' and we are responsible for and committed to protecting your privacy and complying with the UK General Data Protection Regulations (GDPR), Data Protection Act 2018, the EU General Data Protection Regulations where applicable and any subsequent laws or regulations applicable.

In this Privacy Notice, we want to inform you about what information we collect, how we use it and what rights individuals have in relation to the collection and processing of their personal data.

Our Contact Details:

Thrive Wellness Edinburgh

Tel: 07440446626

Email: Thrivewellnessedinburgh@gmail.com

If you have any questions in respect of this Privacy Notice or how we manage your personal data, please contact us using the contact details above.

Who's information do we collect?

We collect personal data in the course of delivering our therapy services. This can belong to our clients, consultants, associates, suppliers and individuals nominated as emergency contacts of clients.

What personal data do we collect and process?

We collect the following types of data:

- General contact details such as, Name, Address, email address, Telephone number
- Details of Services and advice provided to you
- General Communications between you and us

- Financial Details – such as credit checks, payment or bank details
- Session and Discussion notes

Special Categories of Personal Data that we collect:

We collect, process and store the following Special Categories of Personal Data;

- Health and Medical History where it relates to our session
- Any special category personal not requested but shared by you in the course of our sessions

How we collect your information

In most cases we collect your data directly from you. We collect data and process it when you:

- Complete an online 'contact us' form
- Provide information during a meeting or consultation
- Complete a Questionnaire or health declaration form
- Speak to us on the telephone to discuss or use our services
- Email or write to us
- Share information with us during a therapy session

We also receive your data indirectly from the following sources:

- Social Media Sites including LinkedIn
- Public sources – demographic data, Market Research
- Where you are nominated as an Emergency Contact – we receive this from our client

Please Remember: Where you provide any of this information relating to or on behalf of another individual such as a nominated contact, you must remember to ensure that you have the **consent** of the individual and provide them with a copy of or access to this Privacy Notice.

Why we do we collect your information?

Where we collect and process personal data, we identify both the purpose and legal basis for doing so. There are 6 possible legal bases which are:

Consent – where we have consent from the individual to the processing of his or her personal data for one or more specific purpose

Contract – where the processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract

Legal Obligation – The processing is necessary for compliance with a legal obligation to which we are subject

Vital Interests – Where the processing is necessary in order to protect the vital interests of the data subject or another natural person

Public Interest – Where the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller

Legitimate Interests - Where the processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

Our purpose and legal basis for the information we collect, and process allows us to:

Our Purpose for Processing	Our Lawful basis
To understand your requirements prior to entering into a contract of providing a therapy service	The processing is necessary for the performance of an anticipated Contract
To understand all requirements to ensure that any information collected and shared during our contracted therapy is accurate	The processing is necessary for the performance of a Contract
To fulfil our contract of service obligations with you	The processing is necessary for the performance of our Contract
To manage our business operations and comply with any internal policies and procedures	It is in our legitimate interests to use your personal information to ensure that we provide and adapt our services
To comply with our legal obligations, law enforcement, court and regulatory bodies requirements	To comply with our Legal Obligations .
For Training and Development Purposes	We rely on your consent to use personal data in the course of professional and educational development.
To understand medical history and how it relates to your therapy needs	We rely on your consent to process this information. Additional conditions for processing this data are that the data is necessary for the provision of health care.
To provide details to medical professionals if deemed necessary	We rely on your consent to process this which we obtain at the beginning of our contract with you. Additional conditions for processing this data are that the data is necessary for the provision of health care.
To contact a nominated person in the event of an emergency	It is in our legitimate interests to be able to reach an emergency contact to protect our clients

Where we rely on your consent you have the right to **withdraw this consent** at any time by contacting us using the details at the beginning of this notice.

Legitimate Interests - Where the processing of personal data is based on our Legitimate Interests, it is to improve on our service, security and prevent fraud or illegal activity in favour of the wellbeing of our customers, employees and shareholders.

Direct Marketing

We may send you details of similar services to those you have enquired about or purchased from us previously. You can opt out of receiving this information from us at any time by contacting us at the above address or clicking 'unsubscribe' on any messages you may receive.

We will never share or sell your information to any other party for marketing purposes.

Who do we share your information with?

From time to time we may share your personal information with the following third parties for the purposes set out above:

- Our Accountant or Payment Service Providers
- Associates and Contractors who deliver services on our behalf
- Organisations for whom we are contracted to deliver our services
- Lawyers and other Professional Services
- Software, App and Cloud storage providers
- Payment Services and Software Facilities
- Education Institutions and Tutors in the course of professional development – we will always request your consent to do this.
- Police and Law Enforcement agencies where reasonably necessary for the prevention or detection of crime
- Regulators and governing bodies such as HMRC where required
- Selected Third Parties in connection with any future sale, transfer or disposal of our business
- Medical Professionals with your consent or in the event that we identify that you are a danger to yourself or others

International data transfers

With today's modern technology including Cloud Storage and Software, some recipients of your personal data can be located outside your country or have offices in countries where data protection laws may provide a different level of protection than the laws in your country.

Where this is the case, we make sure that additional safeguards are in place such as ensuring that those countries have a decision of adequacy under the UK GDPR or those firms have entered into standard contract clauses with us in their terms to support the ongoing protection of your data.

Automated decision-making or Profiling

We do not process personal data for automated decision making or profiling

How Long do we keep personal data for?

We will retain personal data in accordance with legal and regulatory requirements and for no longer than is necessary to fulfil the purposes set out in this privacy policy. We maintain and review a detailed retention policy which documents how long we will hold different types of data. The time period will depend on the purpose for which we collected the information and is never on an indefinite basis. Subsequently, we will delete your personal data in accordance with our data retention and deletion policy or take steps to properly render the data anonymous, unless we are legally obliged to keep your personal data longer (e.g. for tax, accounting or auditing purposes).

The following details the criteria used to establish the retention period set out within our policy:

Where it is still necessary for the provision of our Services

This includes the duration of any contract for services we have with you and for a period of 10 Years after the end of any contract with a view to maintaining and improving the performance of our products, keeping our systems secure, and maintaining appropriate business and financial records. Most of our retention periods are determined on the basis of this general rule.

Where required by Statutory, contractual or other similar obligations

Corresponding storage obligations may arise, for example, from laws or regulation. It may also be necessary to store personal data regarding pending or future legal disputes. Personal data contained in contracts, notifications and business letters may be subject to statutory storage obligations depending on national law. Where this is the case we will retain the data in accordance with our obligations.

Your Rights as a data subject

As a data subject, you have rights in relation to your personal data. These are:

The Right to Access – You have the right to request details of personal information held or processed and to copies of this data. We do not usually charge for this service.

The Right to Rectification – You have the right to request that any information be corrected that you believe is inaccurate or to complete any information that you believe is incomplete.

The Right to Erasure – You have the right to request that we erase your personal information under certain conditions

The Right to Restrict Processing – You have the right to request that we restrict the processing of your personal data under certain circumstances

The Right to Object to Processing – You have the right to object to our processing of your data, under certain conditions.

The Right to Data Portability – You have the right to request that we transfer the data that we have collected to another organisation or directly to you, under certain conditions.

You also have the **Right to Withdraw Consent** where you have previously provided this at any time.

To exercise any of these rights, or if you have a complaint please contact us using the contact details at the beginning of this notice.

You also have the right to complain to the Supervisory Authority. In the UK, where you wish to report a complaint or feel that we have not addressed your concern in a satisfactory manner, you may contact the Information Commissioner's Office at:

The Information Commissioner's Office – Scotland
Queen Elizabeth House
Sibbald Walk
Edinburgh
EH8 8FT

Telephone: 0303 123 1115

Email: Scotland@ico.org.uk

Contractual Obligations and Consequences

In some circumstances, the provision of personal data is partly required by law (for example, tax regulations, employment and legal obligations) or can also result from contractual provisions. This means that it may sometimes be necessary to conclude or fulfil a contract, that the personal data be provided. In those circumstances where the data is not provided or where certain rights are exercised, (Erasure, Object) there is a possible consequence that the contract could not be fulfilled or concluded and may be cancelled.

Cookies & similar technologies

When you visit our Website, we use cookies and similar technologies to provide you with a better, faster and safer user experience or to show you personalised advertising. Cookies are small text files that are automatically created by your browser and stored on your device when you visit or use the Website. For full information on our use of cookies and how to manage them, please see our Cookie Policy

To learn more about how to manage your browser cookie settings in general please see www.allaboutcookies.org

Remember: When clicking on external links via our website or when you find us via social media platforms, you are visiting or redirected to the domain of those websites. We have no control over the privacy settings on these websites or the cookies they set, so please bear in mind that you should set your preferences in line with their own policies and cookie controls separately.

Data security

We aim to protect your personal data through technical and organisational security measures to minimise risks associated with data loss, misuse, unauthorised access and unauthorised disclosure and alteration.

We store customer records in cloud-based services which have controlled and restricted access. We also operate internal policies and procedures detailing physical security, cloud storage security monitoring, access control and password security measures.

Changes to our Privacy Notice

All businesses change from time to time. At Thrive Wellness Edinburgh we keep our Privacy Notice under regular review.

This Privacy Notice was last updated on 28th June 2022.