

# Data Protection Policy

For services provided by Move with Ease

Move with Ease is committed to protecting and respecting your privacy. This policy together with our terms of use and any other documents referred to on it sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The rules on processing of personal data are set out in the General Data Protection Regulation (the “GDPR”).

## Definitions

**Data controller** - A controller determines the purposes and means of processing personal data.

**Data processor** - A processor is responsible for processing personal data on behalf of a controller.

**Data subject** - Natural person

**Categories of data:** Personal data and special categories of personal data

**Personal data** - The GDPR applies to ‘personal data’ meaning any information relating to an identifiable person who can be directly or indirectly identified by reference to an identifier (as explained in Article 6 of GDPR). For example, name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

**Special categories personal data** - The GDPR refers to sensitive personal data as ‘special categories of personal data’ (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data were processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

**Processing** - means any operation or set of operations which is performed on personal data or on sets of personal data, whether by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation,

use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. **Third party** - means a natural or legal person, public authority, agency, or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

### Who are we?

Move with Ease is Caroline Miller, the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are: Riverside, Laddingford, Kent. ME18 6BP. For all data matters contact Caroline Miller on 07596107341

- The purpose(s) of processing your personal data: We use your personal data for the following purposes: To assist in the planning of your Clinical Massage Therapy, movement instruction and other services as advertised.
- Managing your membership and contacting you regarding queries and feedback relevant to the services you have used or are interested in.
- Answer enquires from you through this website, via phone or e-mail communication or other ways you have contacted Move with Ease.
- Informing you of relevant information relating to Move with Ease and the services it provides you.
- Help to improve the services provided by Move with Ease via your feedback.
- To send occasional newsletters and marketing relating to the services you have used and other services that may become available through Move with Ease. You can opt into and out of the newsletters by unchecking the opt in options at any time and updating your preferences.

### The categories of personal data concerned

With reference to the categories of personal data described in the definitions section, we process the following categories of your data:

- Personal data collected through the data subject's completion of Move with Ease's 'Massage Therapy Client Intake Form' and 'Yoga Intake Form'.
- Information collated from email, text, or telephone communication with the data subject.

### **Our lawful basis for processing your general personal data:**

Explicit consent of the data subject is required. Processing is necessary for the purposes of the legitimate interests of the data controller or a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of the data subject. Personal data is required to ensure the client's health and fitness status is considered when planning and implementing Move with Ease's Clinical Massage Therapy and movement instruction services and for Move with Ease's marketing of its products and services.

### **Sharing your personal data**

No personal data will be shared with (or sold to) third parties unless your permission is given, or it is deemed necessarily e.g., Referral to another health professional for treatment, or colleague who you have shown interest in receiving further information from.

### **Storage and Third Party**

Some communications from Move with Ease may come via third party companies. Move with Ease may use other third parties to store data to enable communication with you, for example, currently information or newsletters are sent through MailChimp. These third parties will have your e-mail address stored and encrypted purely for the use of. All third parties that Move with Ease are compliant with the current data protection laws. Any data held on Move with Ease computer / phone will be password secure. Any paperwork collected about you, the data subject, will be locked in appropriate storage. Move with Ease will take all reasonable precautions to prevent the loss or misuse of your personal data.

### **Cookies**

Move with Ease website does have cookies - they are small pieces of information sent from a web server to a web browser, which enables the web server to collect information from the browser. This information is used to help improve the site and the use you get from it. You will not be identified from the cookies.

### **How long do we keep your personal data?**

We keep your personal data for no longer than reasonably necessary and we only retain your data for the following purposes and use the following criteria to determine how long to retain your personal data:

- Personal data is required to ensure the clients health and fitness status is considered when planning and implementing Move with Ease services.
- Personal data is kept for a period of 7 years for insurance purposes if you have completed an informed consent/health and fitness questionnaire and received services from Move with Ease.
- Personal data is used for marketing purposes when the client has subscribed to this service.
- If services are not required and enquiries dealt with, and you do not wish to be kept on the Move with Ease mailing list your personal details will be securely deleted after 28 days.

### **Providing us with your personal data**

You are under no statutory or contractual requirement or obligation to provide us with your personal data. Knowledge of your current health and fitness status is essential and imperative in providing you with a safe and individualised service from Move with Ease.

### **Your rights and your personal data**

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you.
- The right to request that we correct any personal data if it is found to be inaccurate or out of date.
- The right to request your personal data is erased where it is no longer necessary to retain such data.
- The right to withdraw your consent to the processing at any time, where consent was your lawful basis for processing the data
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable i.e., where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means).

- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing.
- The right to object to the processing of personal data, (where applicable i.e., where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).
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### **Transfer of Data Abroad**

We do not transfer personal data outside of the EEA.

### **Automated Decision Making**

We do not use any form of automated decision making in our business.

### **Further processing**

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

### **Changes to our privacy policy**

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

### **How to make a complaint**

To exercise all relevant rights, queries, or complaints please in the first instance contact our data protection officer, Caroline Miller on 07596 107341. If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the Information Commissioners Office on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.

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