

Privacy and Data Retention Policy

This Privacy and Data Retention Policy describes what you can expect from The Modern Massage Company (“Modern Massage”) with regards to the processing of your personal data, including the sensitive personal data that you provide Modern Massage with as a client or potential client of Modern Massage. This notice explains how we gather, use and share information about you and informs you of your privacy rights.

DATA CONTROLLER

Modern Massage is the data controller and we are responsible for your personal data (referred to as “we”, “us” or “our” in this privacy notice). Julie Allison is the Data Protection Officer and a Data Processor.

WHAT DATA WE COLLECT ABOUT YOU AND HOW IT IS USED

Personal data means any information capable of identifying an individual. It does not include data where the identity has been removed (anonymous data). All the data we collect about you is for our legitimate business interests.

We may process the following categories of personal data about you:

- **Contact Data** means the data we collect when you contact us via phone, text, social media or email. We collect your Contact Data when you contact us to enquire about our services or book an appointment for a treatment, whether contact is online, on paper, by email or over the phone.
- **Personal Sensitive Data.** We process (collect, record and store) your health history, purely for the purposes of ensuring we preform a safe treatment. Some examples of this are to ensure you will not have an allergic reaction to any of our products or to ensure we don't treat you if you were pregnant, or have any other problem that would prevent us from performing a safe treatment. We also process the history of all your treatments with us, so we and you can check your progress in order to perform a tailor made programme of treatments, purely for the purpose of improving your health and wellbeing.
- **Financial Data.** Whether you pay by online direct transfer or via card, we process this data purely for the purposes of our financial records. No card details are stored – nor do we collect any information on card details – this is encrypted by our supplier – Worldpay via our terminal.

For clients under the age of 16, we will only keep and use their personal information with the consent of a parent, carer or guardian.

WHERE YOUR INFORMATION IS STORED

On your first visit to a session, you completed a consultation form. Every time you have a session with us, this form is updated with the treatment you received and any new information about your medical/health history that you share with us. For security, this form is stored in a locked case on the premises.

Your mobile phone number is stored on our mobile phone purely for the purposes of contacting you about legitimate business with you (ie regarding your next session with us). This mobile phone is password protected so that no one else would be able to see any contact data should the phone be lost.

Your email is stored within our gmail account.

HOW LONG YOUR PERSONAL AND SENSITIVE PERSONAL DATA IS KEPT FOR

For tax purposes, we are obliged to keep your data for a minimum of 6 years. If you continue to have sessions with us, of course we keep your records to keep the history. If we have not heard from you after 6 years, we shred your consultation forms. If you would prefer us to shred your form sooner, please email us at modernmassagebeverley@gmail.com

MARKETING

We may from time to time, use your email and the type of treatments you received to contact you to promote our products and services. We only promote those that we feel are relevant to you, using the data you provided. We use your Date of Birth you provided us for birthday vouchers. We DO NOT share your data with anyone else that we are not involved with to market their services.

SHARING YOUR DATA

We do NOT share any of our client's data for third party marketing. The only time we share your data is when it is in our legitimate interest to help run our daily business. The Data that is shared:

- Our financial records are shared with our accountant purely to process The Modern Massage Company's tax return.

CONTACT DETAILS

Our full details are:

Full name of legal entity: Julie Allison T/A The Modern Massage Company.

Email address: modernmassagebeverley@gmail.com

Postal address: 28 St Leonards Road, Beverley, East Yorkshire HU17 7HJ

CHANGES TO OUR PRIVACY POLICY

We may need to update this Policy at any time and without notice. This Policy was last updated on 27th May 2018.

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at modernmassagebeverley@gmail.com

YOUR RIGHTS

Under the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent.

Under data protection laws you have rights in relation to your personal data that include:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please email us at modernmassagebeverley@gmail.com

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response. We will respond to all legitimate personal data requests within one month.

MAKING A COMPLAINT

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us so that we can try to resolve any issues for you.