

Privacy Policy, Alison Dowrick, 19th May 2018

This Privacy Policy is for all business activities carried out by Alison Dowrick, including all services provided under the heading of Your Precious Baby as well as the variety of business services provided by Alison Dowrick. All courses and classes provided (Baby Massage and Baby Yoga) are solely instructed by Alison Dowrick and not by any third party, whether paid or freely provided as charitable work and volunteered to the Horley Children Centre.

GDPR (General Data Protection Regulations) is bringing in new legal protection for personal information from 25th May 2018. This tells you what personal information I gather, and why, and what your rights are.

Contact Details for Alison Dowrick:

Telephone No: 07505 127052

Email address: babymassage@yourpreciousbaby.co.uk

Address: Orchard House, Balcombe Road, Horley, Surrey, RH6 9EA

Data Controller Contact Details: Alison Dowrick, As above.

How personal data is collected

We collect your Personal Data in a number of ways and for various purposes, including:

- a) When you subscribe in our website to receive newsletters – when the facility is available
- b) When you send an email
- c) When you send a message through the 'contact me' form on the website
- d) When you book an appointment via telephone, chat, text or email or other message facility.
- e) When you attend a free post-natal course, baby massage taster session through the Horley Children Centre (which will also be DGPR Compliant by the required deadline).
- f) When you fill the booking Form on or before your class
- g) When you complete an order form
- h) When you commission Alison Dowrick to carry out a business function or service for your business.

The Purpose of processing Client Data

If you choose to contact me (Alison Dowrick) via the contact form then your information is stored on my e-mail system to allow me to contact you, respond to your questions and requests and to handle bookings. Messages by text will be stored indefinitely on my mobile phone. Voice conversations are not recorded.

If you decide to book a course with me, I will need to gather and retain potentially sensitive information about you or your baby's health. Specifically details including details of allergies, medical conditions, your ongoing pregnancy related problems, or any of yours or your baby's special needs (in case we need to adapt the class to allow for these needs).

I will only use this information for ensuring that I direct you in the safest possible way that I know how when instructing in the art of Baby Massage or Baby Yoga. My training certificates are from Hands on Babies and the courses are accredited by the Royal College of Midwives and the CTHA. I am insured with The Holistic Insurance Services.

With regards to my other services, I will hold data required to accurately process orders such as: Name, Business Name (if relevant), Telephone Number / Mobile Number, Email Address, Home Address together with details of the orders taken and any prints required in order to handcraft the silver keepsake jewellery.

Data may also be used as necessary for the purpose of my legitimate interests, if those legitimate interests are not overridden by your rights or interests, such as 1) providing and improving my services. I use your information to provide the services you requested and in my legitimate interest to improve my services; and 2) Compliance with the CThA Code of Practice or Facebook business page terms and conditions. I use your information as necessary to comply with my obligations under the Facebooks Business page terms and conditions.

Lawful Basis for holding and using Client Information

As a full member of the Complimentary Therapist Association, I abide by their code of Practice and Ethics and as well as the requirements of The Holistic Insurance Services with whom I am insured. The lawful basis under which I hold and use your information is my requirement to hold your information for the following legal reasons.

- a) 'Claims occurring' insurance
- b) Complimentary Therapy Associations, CThA's requirements to retain information
- c) Accounting requirements

As I hold special category data (i.e. health related information), the Additional Condition under which I hold and use this information is that I am bound under Confidentiality of such information, No disclosure may be made to any third party, including any member of the client's own family, without the client's consent unless it is required by due process of the law, whether that be by Statute, Statutory instrument, order of any court of competent jurisdiction or howsoever otherwise.

I will NOT share your information with anyone else (other than as required for legal process) without explaining why it is necessary, and getting your explicit consent.

How Long I Retain Your Information for

I will keep your information for 7 years following the end of my services with you. This covers the following constraints.

- a. 'Claims occurring' insurance: (records to be kept for 7 years)
- b. CThA requirements to retain information for 7 years
- c. Accounting

Your data will not be transferred outside the EU without your consent.

Paper files or documents containing personal information will be destroyed by shredding after the required time. Electronic information will be destroyed by deleting it and, when the hardware is discarded, data is protected by physically destroying the hard drive.

Protecting Your Personal Data

I am committed to ensuring that your personal data is secure.

However, you need to understand that, if you contact us publicly in FB or other Social Media, other followers will be able to see your profile photo and public profile. If you write a review in google and/or Facebook, other users might identify you. Please also note that there is no way of deleting messages sent to a Facebook business page.

If you would like to see how Facebook protect your information here are links to their Privacy Policies and their cookie policies

<https://www.facebook.com/business/gdpr>

<https://www.facebook.com/policies/cookies/>

In addition to my own privacy policy, if you pay for gift vouchers with Paypal, your data will be protected by PayPal's privacy policy.

<https://www.paypal.com/uk/webapps/mpp/ua/privacy-prev>

In addition to my own privacy policy, your order will be sent using Royal Mail and will be protected by Royal Mails privacy policy

<https://www.royalmail.com/privacy-policy/>

Security

We understand the importance of protecting your personal information. In order to prevent unauthorised access or disclosure, we have taken the following steps,

- Paper information is either under supervision or secured in a locked cabinet.
- Computers and backups are under supervision or secure in a locked or restricted area at all times. In addition, passwords are used on computers, and screens are locked when they are not in use.
- Email is hosted by 1and1 Webmail, a secure email platform.
- www.yourpreciousbaby.co.uk and linked website; <http://keepsakejewellery.weebly.com> are hosted by Weebly. Weebly Inc. has 'Privacy Shield' in place to ensure that transfers of personal data from would be compliant with EU Privacy Law. Paypal also uses 'Privacy Shield', as does Facebook.

We implement appropriate technical and organizational safeguards to protect against unauthorized or unlawful processing of Personal Data and against accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to Personal Data. Please be advised, however, that we cannot fully eliminate security risks associated with the storage and transmission of Personal Data.

I will contact you using the contact details you give me in relation to:

- Information or information related to your classes
- Orders - regarding; processing information, order status, request for further information in order to complete orders, appointment times and other related reasons in order to process your order with the best possible service and quality.
- Special offers, promotions, events, newsletters – *should you opt in to receive these, and from which you can opt out at any time.*

Marketing and Personal Information

Your personal information will never be provided to any third parties for marketing purposes.

Any marketing material that I send out will only be sent to those who have “Opted-In” to receive it. You can Opt-Out at any time.

Your Rights

GDPR gives you the following rights:

- The right to be informed:
To know how your information will be held and used (this notice).
- The right of access:
To see your therapist’s records of your personal information, so you know what is held about you and can verify it.
- The right to rectification:
To tell your therapist to make changes to your personal information if it is incorrect or incomplete.
- The right to erasure (also called “the right to be forgotten”):
For you to request your therapist to erase any information they hold about you
- The right to restrict processing of personal data.
You have the right to request limits on how your therapist uses your personal information
- The right to data portability: *under certain circumstances you can request a copy of personal information held electronically so you can reuse it in other systems.*
- The right to object.
To be able to tell your therapist you don’t want them to use certain parts of your information, or only to use it for certain purposes.
- Rights in relation to automated decision-making and profiling.
- The right to lodge a complaint with the Information Commissioner’s Office:
To be able to complain to the ICO if you feel your details are not correct, if they are not being used in a way that you have given permission for, or if they are being stored when they don’t have to be.

Full details of your rights can be found at <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>.

If you wish to exercise any of these rights, please contact Alison Dowrick using the details given above.

INSTRUCTOR’S RIGHTS

Please note:

- If you don't agree to your instructor keeping records of information about you and your child, or if you don't allow them to use the information in the way they need to in order to instruct you in a safe way, the instructor may not be able to instruct you.
- Your instructor has to keep your records for a certain period as described above, which may mean that even if you ask them to erase any details about you; they might have to keep these details until after that period has passed. In this situation you would have the right to appeal to the Information Commissioners Office for a ruling.
- Your instructor can move their records between their computers and IT systems, as long as your details are protected from being seen by others without your permission.