

At One Health and Beauty Ltd – Privacy Policy

At One Health and Beauty Ltd is committed to protecting your privacy.

Our privacy policy explains:

- What information we collect, and why we collect it;
- How we use that information;
- How we protect that information;
- How you can control your information, including accessing, updating and deleting what we store; and
- How we share information collected.

This Privacy Policy applies to At One Health and Beauty Ltd operating as At One Day Spa and The Birmingham Massage Clinic, and covers our processing activities as a data controller.

Our Data Protection Officer is:

- Name: Bethan Davies
- Address: At One Day Spa, 10 Great Western Arcade, Birmingham B2 5HU
- Tel: 0121 233 0600
- Email: beth@atonedayspa.co.uk

INFORMATION WE COLLECT

Information you give us

We may collect or record basic personal information which you provide through completing forms via paper, tablet or online, or through electronic mail you send to us, or through other means of communication between you and us. The categories of personal information you provide may include:

- first and last name;
- job title and company name;
- email address;
- phone number
- mailing address;
- password to register with our third party system (for online booking, accessing your personal data, etc);
- your personal or professional interests;
- any health issues you tell us about or we identify during the course of treatment;
- any medication you tell us you are using;
- name and contact details for your emergency contact;
- name and contact details for your GP;
- any other identifier that permits us to make contact with you.

We do not collect sensitive personal information (e.g. social security or other governmental ID numbers, credit card details and account numbers, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership; sexual orientation; genetic or

biometric data). All information will be collected, stored, accessed and processed in a secure manner.

Information we generate about you

We collect, store and use information about the treatments and recommendations you receive from us. This includes the following information:

- treatment(s) carried out;
- who carried out your treatment(s);
- relevant observations made during your treatment(s) – for example, skin conditions, areas of tension, feedback received from you;
- recommendations we make before, during or after treatment – for example recommended products, exercises, treatments;
- photographs required to monitor treatment progress

Information processed by third parties

We work with selected third parties through whom we gather information about you and your treatments in order to provide you with a more enhanced service. Details of these are contained in this document.

HOW WE USE INFORMATION

As a data controller, we will only use your personal information if we have a legal basis for doing so. The purpose for which we use and process your information and the legal basis on which we carry out each type of processing is explained in the table below.

Note that we may process your personal data for more than one lawful ground if the data is used for several purposes. Please Contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

| Purposes for which we will process the information | Type of data | Legal basis for the processing |
|-------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| To provide you with information and updates about the Spa, offers, events and other related news, through occasional email or text newsletters. | Identity Contact | We ask for your consent to use your data for marketing purposes. You can choose to unsubscribe from this service whenever you wish using the unsubscribe links we send you or by requesting removal by emailing info@atonedayspa.co.uk . |
| To personalise our services and products to you. | Identity Contact Treatment Health Occupation | We ask for information about medical conditions, medicines, etc in order to make sure that we can take into account treatment contraindications and give you safe services appropriate to your needs. We also gather information when we treat you so that we can make appropriate recommendations. We record some information so that if you come for further treatments with us, your therapist can access information to keep you safe. |

| | | |
|-----------------------------------------------------------------------------------------------------------------------------|------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| To send you texts, calls or emails related to your treatment | Contact | We send out text reminders 48 hours prior to treatment. We may also contact you by phone, text or email to advise you about changes, cancellation, delays, etc. This allows us to ensure that you get the best from us. Consent to receiving contact about treatments is separate to consent to receiving marketing messages. |
| To send you information regarding changes to our policies, other terms and conditions and other administrative information. | Identity Contact | It is in our legitimate interests to ensure that any changes to our policies and other terms are communicated to you. We consider this use to be necessary for our legitimate interests and will not be prejudicial or detrimental to you. |
| For data analysis, research, statistical and survey purposes. | Profile Treatment | Your data will be anonymised to allow us to track trends and profile the nature of our clients in order to improve our services. |
| To enforce the terms and conditions and any contracts entered into with you. | Identity Contact | It is in our legitimate interests to enforce our terms and conditions of service. We consider this use to be necessary for our legitimate interests and proportionate. |
| GP and emergency contact information | Emergency Contact GP Contact | We ask for this information to ensure that if we encounter any issues during treatment, we can contact people who can help us to help you. We may also contact your GP for permission to treat you if you have a contraindicated condition. We will only do this with your express permission. |
| To advise you of any problems you need to be aware of. | Contact Identity | We are required to keep you safe. Because of the nature of our work we need to be able to make contact with you if we have an urgent concern. An example of this would be if someone visited our business and then found they had a notifiable disease and we needed to contact anyone having a treatment around that time. |

Gathering and processing some data is essential for us to provide you with a safe service and perform our contract with you – that contract being that we will to carry out a treatment in exchange for a consideration from you, our client. If you do not wish to provide us with your personal data and processing such data is necessary for the performance of that contract, we may not be able to perform our obligations under the contract between us.

Where you provide consent, you can withdraw your consent at any time and free of charge, but without affecting the lawfulness of processing based on consent before its withdrawal. You can update your details or change your privacy preferences by contacting us as provided in “Contacting us” above.

Where we rely on legitimate interests as a lawful basis, we will carry out a balancing test to ensure that your interests, rights and freedoms do not override our legitimate interests. If you want further information on the balancing test we have carried out, you can request this from us by Contacting us.

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Third-party marketing

We do not share personal data with any company outside At One Health and Beauty Ltd for marketing purposes.

We use some third party systems to facilitate marketing contact with you as follows:

| System | Data | Purpose |
|-------------|------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Kitomba | As previously stated | Kitomba is our client management system and we use its functionality to send out marketing messages via email or text either directly or via Mailchimp. |
| Mailchimp | Name and email | Mailchimp is a third party provider that we use to send out marketing emails that you have opted into. Mailchimp does not use your personal data for any other purposes. |
| RingCentral | Phone number Voicemail messages | RingCentral is a third party provider of voice-over IP phone systems. If you call us and do not withhold your number, your number will be held on RingCentral and we may use it to contact you even if you do not leave us a voicemail message. Voice messages are also stored on RingCentral's systems until we delete them. We delete voice messages up to three months after receipt. |

OPTING OUT

You can opt out of receiving marketing messages when you complete a consultation form at treatment. Alternatively, you can ask us to stop sending you marketing messages at any time by contacting our info@atoneodayspa.co.uk or by using the 'Unsubscribe' link at the bottom of all our marketing communications.

CHANGE OF PURPOSE

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose,

we will notify you in a timely manner and we will explain the legal basis which allows us to do so.

DATA PROCESSING

We work with some third parties who collect and process personal information on our behalf. These are:

| System | Data | Purpose |
|-----------------|----------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Kitomba | As previously stated | This is our client processing software which stores all our client data securely. Further information about Kitomba and its data processing systems is available from us on request. |
| Dermalogica | Name Contact information Facial-related data (skin type, health information, etc) Recommendations and treatments carried out. | This is our skincare provider who host an online facemapping system. This system allows us to email information and recommendations out to you after a consultation or treatment. Dermalogica will not use this information for marketing without your permission. You can choose whether or not to have your data gathered by Dermalogica. |
| Rehab My Client | Name Contact details Recommended rehabilitation exercises Relevant medical conditions | This is a software system that we use to provide you with exercise and rehabilitation recommendations that we can email to you for home use. Rehab My Client will not use this information for marketing without your permission. You can choose whether or not to have your data gathered by Rehab My Client. |

DISCLOSURE OF YOUR PERSONAL DATA TO THIRD PARTIES

We will not sell, rent, lease or otherwise share your personal information other than as outlined in this Privacy Policy or without obtaining your consent beforehand.

External third parties

Personal information may also be shared with our third party service providers and business partners who assist with the running of the business and our services and products. Our third party service providers and business partners are subject to security and confidentiality obligations and are only permitted to process your personal information for specified purposes and in accordance with our instructions.

We may also post links to third party websites as a service to you as part of our marketing output or on our website. These third party websites are operated by companies that are

outside of our control, and your activities at those third party websites will be governed by the policies and practices of those third parties. We encourage you to review the privacy policies of these third parties before disclosing any information, as we are not responsible for the privacy policies of those websites.

In addition, we may disclose information about you when we believe, in good faith, that such use or disclosure is reasonably necessary to:

- comply with law
- enforce or apply the terms of any of our user agreements
- protect our rights, property or safety,, or the rights, property or safety of our users, or others
- in the event that we become involved in a business divestiture, change of control, sale, merger, or acquisition of all or a part of our business, in which case we may disclose your personal information to the prospective seller or buyer of such business or assets;
- if all or substantially all of our assets are acquired by a third party, in which case personal information held by it about its customers will be one of the transferred assets;
- if we are under a duty to disclose or share your personal information in order to comply with any legal or regulatory obligation;
- if necessary to protect the vital interests of a person; and
- to enforce or apply our terms and conditions or to establish, exercise or defend the rights of At One Health and Beauty Ltd, our staff, customers or others.

INTERNATIONAL TRANSFERS

Some of your data (as outlined above) is held by companies based outside the EEA (European Economic Area) – for example MailChimp, Kitomba and RingCentral. This may involve transferring your data to servers based in Canada, the USA, Australia and New Zealand. We only use third party providers who demonstrate an adequate level of protection for personal data.

You can contact us as provided in “Contacting us” above if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

SECURITY OF YOUR PERSONAL DATA

The security of your personal information is important to us. We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it.

We use appropriate measures to safeguard personally identifiable information, which measures are appropriate to the type of information maintained, and follows applicable laws regarding the safeguarding of any such information under our control. In addition, we may use encryption technology to enhance information privacy and help prevent loss, misuse, or alteration of the information under our control. We also employ industry-standard measures and processes for detecting and responding to inappropriate attempts to breach our systems.

No method of transmission over the Internet, or method of electronic storage, can be 100% secure. Therefore, we cannot guarantee the absolute security of your information. The Internet

by its nature is a public forum, and we encourage you to use caution when disclosing information online. Often, you are in the best situation to protect yourself online. You are responsible for protecting your username and password from third party access, and for selecting passwords that are secure.

If you have any questions about security on our Site, you can contact us as provided in “Contacting us” above.

DATA RETENTION: HOW LONG WE KEEP YOUR PERSONAL DATA

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

We keep client records (physical and electronic for 6 years from the last visit a client makes to us. This allows us to retain information for sufficient period of time to protect our business in the event of you making a legal claim against us. After this time our client records are securely destroyed.

YOUR RIGHTS

Subject to certain limitations, you have rights under data protection laws in relation to your personal data. These rights include the rights to:

- **Request access to your personal data** - (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it. Note that we may refuse to comply with a request for access if the request is manifestly unfounded or excessive, or repetitive in nature.
- **Request correction of your personal data** - this enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us. Note that we may refuse to comply with a request for correction if the request is manifestly unfounded or excessive, or repetitive in nature.
- **Request erasure of your personal data** - this enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note that we may refuse a request for erasure, for example, where the processing is necessary to comply with a legal obligation or necessary for the establishment, exercise or defence of legal claims.
- **Request restriction of processing your personal data** - this enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer

require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it. Note that we may refuse to comply with a request for restriction if the request is manifestly unfounded or excessive, or repetitive in nature.

- **Request transfer of your personal data** - we will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies where your personal data is processed by us with your consent or for the performance of a contract and when processing is carried out by automated means.
- **Right to withdraw consent** - you can withdraw your consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.
- **Right to object** – you can object where we are processing your personal data for direct marketing purposes. You also have the right to object, on grounds relating to your particular situation, at any time to processing of your personal information which is based on our legitimate interests. Where you object on this ground, we shall no longer process your personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.
- **Rights relating to automatic decision making and profiling** – we do not carry out automated decision making or profiling using your personal data. We may use anonymised data for the purposes of analysing business performance and improving our services.

EXERCISING YOUR RIGHTS

If you wish to exercise any of the rights set out above, including withdrawing consent, please contact us giving us specific details regarding which right you choose to exercise.

No fee usually required

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. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

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.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Please direct any questions about your information to the Data Protection Contact identified above.

SOCIAL MEDIA AND ONLINE ENGAGEMENT

We occasionally use a variety of new technologies and social media options to communicate and interact with customers, potential customers, employees and potential employees. These sites and applications include popular social networking and media sites, open source software communities and more. To better engage the public in ongoing dialog, certain of our businesses use certain third-party platforms including, but not limited to, Facebook, Twitter and LinkedIn. Third-Party Websites and Applications (TPWA) are Web-based technologies that are not exclusively operated or controlled by us. When interacting on those websites, you may reveal certain personal information to us or to third parties. Other than when used by our employees for the purpose of responding to a specific message or request, we will not use, share, or retain your personal information.

- The Facebook privacy policy is available at: <http://www.facebook.com/policy.php>
- The Twitter privacy policy is available at: <http://twitter.com/privacy>
- The LinkedIn privacy policy is available at: http://www.linkedin.com/static?key=privacy_policy

WEBSITE

Cookies

We may use small files commonly known as “cookies” on our website. Cookies are a technology that can be used to help personalize your use of a website. A cookie is a small amount of data which often includes a unique identifier that is sent to your computer or mobile phone (your “device”) from the Sites and is stored on your device’s browser or hard drive. The cookies we use on the Sites won't collect personally identifiable information about you and we won't disclose information stored in cookies that we place on your device to third parties.

To enable us to assess the effectiveness and usefulness of our website, and to give you the best user experience, we collect and store information such as pages viewed by you, your domain names and similar information. Our website makes use of anonymous cookies for the purposes of:

- Completion and support of Site activity;
- Site and system administration;
- Research and development; and
- Anonymous user analysis, user profiling, and decision-making.

We use Google Analytics to analyse anonymised data related to our website.

By continuing to browse our website, you are agreeing to our use of cookies.

If you don't want us to use cookies when you use the website, you can set your browser to notify you when you receive a cookie, giving you the chance to decide whether to accept it or decline at any time. However, if you block cookies some of the features on the website may not function as a result.

You can find more information about how to do manage cookies for all the commonly used internet browsers by visiting www.allaboutcookies.org. This website will also explain how you can delete cookies which are already stored on your device.

IP Addresses and Aggregate Information

An Internet Protocol (“IP”) address is associated with your computer’s connection to the internet. We may use your IP address to help diagnose problems with our server, to administer the website and to maintain contact with you as you navigate through the website. Your computer’s IP address also may be used to provide you with information based upon your navigation through the website.

Aggregate information is used to measure the visitors’ interest in, and use of, various areas of the website and the various services that we offer. We will rely upon aggregate information, which is information that does not identify you, such as statistical and navigational information. With this aggregate information, we may undertake statistical and other summary analyses of the visitors’ behaviours and characteristics. Although we may share this aggregate information with third parties, none of this information will allow anyone to identify you, or to determine anything else personal about you.

Links

The Sites may, from time to time, contain links to and from the websites of our business partners, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal information to these websites.

Kitomba and Paypal

Our website contains links to Kitomba and Paypal for the purposes of making bookings or buying products such as vouchers. When using these services you are subject to the Privacy Policies of these third parties. Selected data will be visible to us (e.g. name, contact details, payments received, etc) but we do not have any access to your payment details.

CHILDREN

Although we can carry out treatments on children age 7 plus, we do not hold any data on those clients other than their name and any known medical conditions. We do not create a client record for these clients, but instead we create a client record for the parent and attach the name and medical details form as an image to the documents held.

COMPLAINTS

For the UK: You have the right to make a complaint at any time with a supervisory authority, in particular in the EU (or EEA) state where you work, normally live or where any alleged

infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

If we receive formal written complaints, we will follow up with the person making the complaint. We work with the appropriate regulatory authorities to resolve any complaints that cannot be resolved directly. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

CHANGES TO THIS POLICY

We regularly review our compliance with our privacy policy. We also adhere to several self-regulatory frameworks in addition to complying with applicable law.

We may change this privacy policy from time to time. If this privacy policy changes, the revised privacy policy will be posted at the "Privacy Policy" link on our website's home page and held at our business premises. Please check the privacy policy frequently. Your continued use of the Site constitutes acceptance of such changes in the privacy policy, except where further steps are required by applicable law. This privacy policy was last updated on the date set out at the end of the policy.

Last updated: 24 May 2018