

DATA PRIVACY NOTICE

This is privacy notice of 'Julia Russell'.

We respect your privacy and are committed to protecting your personal data.

The purpose of this privacy notice is to inform you as to how we process and safeguard your personal data, including when you visit our website (regardless of where you visit it from) and tell you about your privacy rights.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below.

1. WHO WE ARE AND IMPORTANT INFORMATION

2. THE PERSONAL DATA WE COLLECT ABOUT YOU

3. HOW WE COLLECT YOUR PERSONAL DATA

4. HOW WE USE YOUR PERSONAL DATA

5. WHO WE SHARE YOUR PERSONAL DATA WITH

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9. YOUR LEGAL RIGHTS

Please use the Glossary at the end of this document to understand the meaning of some terms used in this privacy notice.

1. WHO WE ARE AND IMPORTANT INFORMATION

The purpose of this privacy notice

This privacy notice aims to give you information on how we collect and process your personal data through your use of this website, including any data you may provide through this website when you for example, make an enquiry about services, or sign up for a newsletter.

This website is not intended for children and we do not knowingly collect data from this website relating to children.

This privacy notice also aims to give you information on how we collect and process your personal data during direct interactions in our practice, including personal data used for performance of a contract, for example, when you purchase a product or service, and personal sensitive data such as health data which we may collect and process for the purposes of the provision of health care or treatment.

You must read this privacy notice together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware

of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Data controller

'Julia Russell' is the controller and responsible for this website and for your personal data (collectively referred to as "Julia Russell", "we", "us" or "our" in this privacy notice).

Our business correspondence address is :

30 Long Marsh Lane,
Lancaster,
LA1 5QX.

Telephone : 0152433389

Email : juliarussell@hotmail.co.uk

For all data matters please contact Julia Russell as above.

To exercise all relevant rights, or for any queries or complaints in relation to this policy or any other data protection matter between you and us, we would appreciate the chance to deal with your requests or concerns, so please contact us in the first instance.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioner's Office](#) (ICO), the UK supervisory authority for data protection issues, via email on their website on www.ico.org.uk, by phone on 03031231113 or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England, UK.

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 20th May 2018.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links outside of our control

This website may include links to third-party websites. Clicking on those links or enabling those connections may allow third parties to collect or share data about you.

We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. THE PERSONAL DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). You can find out more about personal data from the [Information Commissioner's Office](#).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, last name, username, title, gender.
- **Contact Data** includes email address, delivery address, billing address, telephone numbers.

- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes feedback and survey responses, your interests and preferences.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.
- **Special Category of Personal Data** – in the course of our interaction with you, we may process **Health Data** including information you disclose about past and current health status, medical reports you may provide us with, our records of health care, advice and treatment provided and will process this in accordance with Article 9 (2,h).

We do not collect any other **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

We may also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

If you fail to provide personal data

Where we need to collect your personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. HOW WE COLLECT YOUR PERSONAL DATA

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity Data or Contact Data in person, by filling in forms or by corresponding with us by post, phone, email, text messaging or otherwise. This includes personal data you provide when you:
 - Apply for our products or services, for example enquiring about an appointment for healthcare treatment or purchasing a product or service;
 - Subscribe to our newsletter;

- Request marketing to be sent to you;
 - Information provided as part of a treatment;
 - Complete a survey;
 - Give us some feedback.
- **Automated technologies and interactions.**
We produce an email newsletter using a third party provider, Mailchimp. This is only sent to those who have chosen to receive it by completing a sign up form. The privacy notice for Mailchimp can be viewed at <https://mailchimp.com/legal/privacy/>. You can unsubscribe from the newsletter at any time. If you are a subscriber, we gather statistics around your use of this newsletter to help us monitor and improve our newsletter and may collect Technical Data about your equipment, browsing actions and patterns.
 - **Third parties and publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - **Technical Data** from the following parties:
 1. Analytics providers such as Google based outside the EU;
 2. Advertising networks;
 3. Search information providers.
 - **Contact, Financial and Transaction Data** from providers of technical, payment and delivery services.
 - **Identity and Contact Data** from data brokers and aggregators.
 - **Identity and Contact Data** from publicly available sources such as Companies House and the Electoral Register.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- **Performance of Contract** this means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- **Legitimate Interest** this means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the most secure experience and where your interests and fundamental rights do not override those interests.
- **Comply with a legal or regulatory obligation** this means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.
- **Provision of health care or treatment** this means that processing of any health data which you disclose to us will be undertaken for the purposes of providing health care and treatment.

Generally, we do not rely on consent as a legal basis for processing your personal data. You have the right to withdraw consent to marketing at any time by contacting us.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, with the legal bases we rely on to do so.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. 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.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process an order and deliver products/services to you including: a)manage payments, fees and charges b)collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To provide health care and treatment to you	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications (f) Special category – Health Data	(a) Provision of Health Care and Treatment (b) Performance of a contract with you (c) Necessary to comply with a legal obligation (d) Necessary for our legitimate interests (to maintain treatment records)
To manage our relationship with you which will include: a)notifying you about changes to our terms or privacy policy b)asking you to offer feedback or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and this website	(a) Identity	(a)Necessary for our legitimate interests (for running our business, provision of

(including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(b) Contact (c) Technical	administration and IT services, to prevent fraud and in the context of a business reorganisation or restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our organisation and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our organisation and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to develop and grow our organisation)

Marketing

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

If you have any queries about this, please contact us.

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us, and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We will not share your personal data with any company outside 'Julia Russell' for marketing purposes.

Opting out

You can ask us to stop sending you marketing messages at any time by contacting us.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of your health care, a product/service purchase, product or service experience or other transactions.

Cookies

We do not use cookies on our website.

Change of purpose

We will only use your personal data 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please us at any time.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. WHO WE SHARE YOUR PERSONAL DATA WITH

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- External Third Parties
 - Service Providers acting as processors based in the United Kingdom who provide IT and system administration services.
 - Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
 - HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in United Kingdom who require reporting of processing activities in certain circumstances.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

We do not transfer your personal data outside the European Economic Area (EEA).

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data for seven years after they cease being customers for tax purposes and to comply with requirements of the professional associations of which we are members.

In some circumstances you can ask us to delete your data: see **Your legal rights** below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

Unless subject to an exemption under the data protection laws, 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 the lawful basis for processing your 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 9i.e. where our processing is based on consent or is necessary for the performance of our contract with you or where we process your 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 our processing of personal data, where applicable i.e. where processing is based on our legitimate interests (or in performance of a task in the public interest/exercise of official authority); direct marketing or processing for the purposes of scientific/historical research and statistics).

If you wish to exercise any of the rights set out above, please contact us.

No fee required – with some exceptions

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 administration 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.

Glossary of 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 in particular by reference to an identifier (as explained in Article 6 of GDPR). For example, name, home address or private email address. Online identifiers include IP addresses.

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 where 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 or not 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.