

GENERAL PRIVACY NOTICE

1. INTRODUCTION

This privacy notice provides you with details of how The Planetary Healing Centre (PHC) collects and processes your personal data through your use of our site www.planetary-healing.org including any information you may provide through our site and/or in person at the centre when you request information, attend one of our classes and groups, access one of projects, sign up to our newsletter, etc.

By providing us with your data, you warrant to us that you are over 13 years of age.

The PHC is the data controller and we are responsible for your personal data (referred to as “we”, “us” or “our” in this privacy notice).

We have appointed Data Protection Officers who are in charge of privacy related matters for us. If you have any questions about this privacy notice, please contact the Data Protection Officers using the details set out.

Contact Details - our full details are:

Full name of legal entity: The Planetary Healing Centre

Data Protection Officers: Ana Duarte and Grigorios Karastamatis

Email address: holistic@planetary-healing.org

Postal address: 288 Portobello High Street, Edinburgh, EH15 2AS

Headquarters: Cockburnhill Road, Edinburgh, EH14 7JB

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 should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

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 holistic@planetary-healing.org.

2. WHAT DATA DO WE COLLECT ABOUT YOU

Personal data means any information capable of identifying an individual, which is not anonymous.

We may process certain types of personal data about you as follows:

Identity Data may include:

Your name, you decide what names you want to provide us with;

Age range;

Gender.

Contact Data may include:

Postcode;

Email address;

Telephone numbers – landline and/or mobile.

Financial Data may include:

What kind of benefits you are receiving.

Sensitive Data:

The PHC and therapists will need to collect sensitive data about you before and during your appointment in order to treat you with the therapy that you have booked in for. If you require a private session outside our charitable projects, you will be passed to a freelance therapist, who will become the data processor and you will be treated at either our premises or at other venues. All our therapists are disclosed and fully certified. Please note that the PHC does not check if freelance therapists are GDPR compliant.

When you book in we only ask for contact information for the purposes of booking you in. You will be asked to read and sign a GDPR compliant Registration Form, Assessment Needs Form and Confidentiality Form when you see your therapist for the first time from 25/05/18. The PHC will require your 'explicit consent' or 'agreement to legitimate interests' for processing sensitive data, before consulting with you.

Where we are required to collect personal data by law, or under the terms of the contract between us and you do not provide us with that data when requested, we may not be able to perform the contract (for example, to deliver goods or services to you). If you don't provide us with the requested data, we may have to cancel a service you have ordered but if we do, we will notify you at the time.

3. HOW WE COLLECT YOUR PERSONAL DATA

We collect data about you through a variety of different methods including:

Direct interactions: You may provide data by filling in forms on our site (or otherwise) or by communicating with us by post, phone, email or otherwise, including when you:

Order our services;

Subscribe to our service or publications;

Request resources or marketing be sent to you;

Enter a promotion or survey; or

Give us feedback.

Third parties or publicly available sources: We may receive personal data about you from various third parties and public sources, such as:

Contact, Financial and Transaction Data from providers of technical, payment and delivery services

Identity and Contact Data from data brokers or aggregators.

Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

Search information providers.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when legally permitted. The most common uses of your personal data are:

Where we need to perform the contract between us.

Where it is necessary for our legitimate interests (or those of a third party, such as freelance therapists) and your interests and fundamental rights do not override those interests.

Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal ground for processing your personal data, other than in relation to sending marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by emailing us at holistic@planetary-healinb.org.

Purposes for processing your personal data:

Set out below is a description of the ways we intend to use your personal data and the legal grounds on which we will process such data. We have also explained what our legitimate interests are where relevant.

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 email us at holistic@planetary-healinb.org 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
To register you as a new customer	(a) Identity (b) Contact (c) Financial	Performance of a contract with you
To manage our relationship with you, this will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey (c) Remind you of your appointment with us (d) Report any changes to your appointment with us	(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 services
To enable you to partake in occasional surveys	(a) Identity (b) Contact (c) Profile (d) Usage	(a) Performance of a contract with you (b) Necessary for our legitimate interests to study how customers use our services, to develop them, grow our business and for future grant application
To deliver relevant website content and advertisements (classes and groups, Holistic Festival, fundraising events, other events, etc.) to you and measure and understand the effectiveness of our advertising	(a) Identity (b) Contact (c) Usage (e) Marketing and Communications	Necessary for our legitimate interests to study how customers use our services, to develop them, to grow our business and to inform our marketing strategy

To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests to develop our products/services and grow our business
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Marketing communications:

The Edinburgh Holistic Shop is a trading arm of the PHC. Occasionally, you will receive marketing communications from us if you have provided us with your details and tick the box at the point of entry of your details for us to send you marketing communications. However, where you opt out of receiving our marketing communications, this will not apply to personal data provided to us as a result of a service purchase, warranty registration, product/service experience or other transactions.

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 find out more about how the processing for the new purpose is compatible with the original purpose, please email us at holistic@planetary-healing.org.

If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

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

Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.

6. 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 such data. 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.

7. 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 five years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see 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, statistical or funding purposes in which case we may use this information indefinitely without further notice to you.

8. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- 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 holistic@planetary-healing.org.

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.

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 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.

9. THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. 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.

10. COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookie policy

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. Please note we do not hold information electronically.

The right to object:

To be able to tell your therapist you do not 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 do not 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 use the contact details given above.

If you are dissatisfied with the response you can complain to the Information Commissioner's Office. Their contact details are at: www.ico.org.uk

PHC'S RIGHTS:

Please note:

If you do not agree to the PHC keeping records of information about you and your treatments, or if you do not allow us to use the information in the way we need to for treatments, we may not be able to treat you.

We have to keep your records of treatment for a certain period, as described above, which may mean that even if you ask us to erase any details about you, we might have to keep these details until after that period has passed.

We can move your records between the centre in Portobello and headquarters in Balerno, as long as your details are protected from being seen by others without your permission.

In order to give professional treatments, we will need to ask for and keep information about your health. We will only use this for informing treatments and any advice we give as a result of your treatment. The information to be held is:

Your contact details;

Medical history and other health-related information (which we will take from you at first consultation);

Treatment details and related notes (which we will take after each consultation)

We will NOT share your information with anyone else other than within our own practice, or as required for legal process, without explaining why it is necessary, and getting your explicit consent.

It may be helpful for your treatment for us to share your information with practitioners working with us at the PHC so that we can work together as a team, but we will only do that with your agreement. The information to be shared would be your basic contact details and any relevant health information that would be relevant to them in order to treat you. If you prefer, you can go through this with them yourself rather than via shared information.

Protecting Your Personal Data

We are committed to ensuring that your personal data is secure. In order to prevent unauthorised access or disclosure, we have put in place appropriate technical, physical and managerial procedures to safeguard and secure the information we collect from you.

We will contact you using the contact preferences you give us in relation to:

- Appointment times;
- Treatment information or information related to your health;
- Special offers and promotions, if subscribed (you may unsubscribe from this at any time).

Please email us at holistic@planetary-healing.org to acknowledge that you have read and understood our Privacy Policies.

FURTHER INFORMATION

At the PHC, we take your privacy seriously and will only use your personal information to effectively provide services that you have requested from us.

Booking - We ask for your name, email address and mobile number.

Your email address is needed so that you can receive invitation to events, classes and groups, fundraising activities, Holistic Festival, etc.

Your mobile number is required in case we need to call or text you before your treatment to ask you anything relating to your appointment, to contact you should we need to make any changes to your appointment, and so that you can receive a text reminder 24 hours before your session.

These details are seen by the coordinator and possibly by the management team and clinic administrator. All therapists listed on our website are volunteers and freelancers, thus making them data processors.

Private sessions

When you request a private session, outside our charitable projects, with your consent, we pass your details to the therapist(s) of your choice and you book directly with them. You become, therefore, their client and you pay them directly. For future bookings you can either book directly with your therapist or through the PHC. If you wish to see a different therapist that practises at the PHC you should contact the PHC to be booked in.

Details taken in-person at the PHC

When you come for your first session, the PHC will ask you for your name, address, telephone numbers and email address in order that we can contact you between sessions and/or in case of an emergency situation during your session.

You will be given the option to opt-in to receive newsletters and invitations to events, classes and groups, etc. You can unsubscribe from emails at any time via a link on the email.