

## BetterBody Me Ltd. Privacy Policy

### 1. Our contact details

<b>Name:</b>	BetterBody Me. "BBM" is the abbreviated trading name of BetterBody Me Ltd.
<b>Companies House registration number:</b>	13390673
<b>Information Commissioners Office (ICO) registration number:</b>	ZB086365
<b>Address:</b>	36 Sheraton House, Castle Park, Castle Hill, Cambridge, CB3 0AX
<b>Phone Number:</b>	01223
<b>E-mail:</b>	<a href="mailto:info@betterbodyme.co.uk">info@betterbodyme.co.uk</a>
<b>Web Address:</b>	<a href="http://www.betterbodyme.co.uk">www.betterbodyme.co.uk</a> ("our site")

### 2. BACKGROUND & INTRODUCTION

The Data Protection Act 2018 (DPA 2018) sets out how, what and why personal information can be collected, handled, stored and disposed of by all UK organisations. The act includes the UK's implementation of the General Data Protection Regulation (GDPR) that became legally required across all EU countries on 25<sup>th</sup> May 2018 which strengthened the DPA 2018, particularly around individuals' rights. You can find out more information about this act, including your rights here: [www.gov.uk](http://www.gov.uk)

BetterBody Me Ltd. ("BetterBody Me", "we", "us" or "our") is serious about protecting and respecting the privacy of our clients, staff and website visitors and is committed to safeguarding this information in full compliance with law. Please read this Privacy Policy ("the Policy") carefully as it contains important information about how we will use, treat and protect your personal data collected by all means, including information collected from:

- From you, with your consent,
- With you, by our team,
- About your device, from our website (including through the use of cookies), or
- From other third parties, such as our payment system or website analytics portal.

### 3. WHY DO WE COLLECT YOUR INFORMATION AND UNDER WHICH LEGAL BASIS IS IT DONE?

Most of the personal information we process is provided to us directly by you although we do also obtain information indirectly, from our website and payment providers. The reasons for the collection of information may include:

- i. To ensure that we can provide safe, effective and individualised services to you,
- ii. To take payment for delivery of our services,
- iii. To get in contact with you to advise you of any issues or to discuss your treatment with you,
- iv. To improve and expand our services to meet the needs of our client base,
- v. To improve the functionality of our website and payment portals, or
- vi. To contact you in the future to advertise services and/ or events that may be of interest to you.

Under the General Data Protection Regulation (GDPR), we rely on two lawful basis' for processing your information, which are:

- For information pertaining to your contact information, and payment details we rely on **consent** as our legal basis. You are able to remove your consent at any time and can do this by contacting [info@betterbodyme.co.uk](mailto:info@betterbodyme.co.uk).
- For all other information collected we rely on having a legitimate interest. We collect personal details, including details of your health in the **legitimate interest: health**. This ensures that we can provide a safe and appropriate therapy to you.

### 4. WHAT TYPE OF INFORMATION DOES BETTERBODY ME COLLECT, AND WHY DO WE COLLECT IT?

#### 4.1. From you, with your consent: *Reasons for collecting the data listed below include: 3.i, 3.ii, 3.iii, 3.iv, 3.v & 3.vi.*

We may collect information from you via any of the following methods:

- Face to face,
- Telephone or email correspondence,
- Client consultation forms,
- Our website and booking portal ( [www.betterbodyme.co.uk](http://www.betterbodyme.co.uk) )
- In the event of you reporting a fault with our website or booking service or are contacting us for any other reason.

The information collected may include your:

- Name,
- Gender,
- Date of Birth,
- Next of kin or guardian details,
- Contact details,
- Payment card details,
- The reason for contact having been made,
- CoVid19 health declaration/ status,
- Information about your health, necessary for the purpose of booking,

- Your testimonial or image for purposes of marketing and advertisement, or for other clients assurance.

#### **4.2. With you, by our team:** *Reasons for collecting the data listed below include: 3.i.*

Therapists' notes:

- Our therapists will make notes about each therapy / session provided to you; these might include information that you provide to your therapist about your reason for seeking our support, or any observations made by our therapist during the session. Notes may include details of an injury, your diet or exercise history, for example.
- Information will only be recorded if it is deemed of possible use when providing future treatments to you, or if it provides explanation around why a treatment had been performed or recommended already.
- These notes would be made available to other members of the BetterBody Me team for purposes of professional supervision or in cases where another therapist provides a treatment to you.

#### **4.3. About your device, from our website:** *Reasons for collecting the data listed below include: 3.ii & 3.iv.*

Each time you visit our website the following information may be collected, depending on your own browser and cookie settings and permissions:

- Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, browser type, IMEI number, push ID, version, country and language, time zone setting, browser plug-in types and versions, operating system, and platform,
- Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from Our Site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.
- BetterBody Me is compliant with current EU Cookie Law. Details of this law and the purpose and function of cookies can be found [here](#). Cookies are used for "strictly necessary" and "performance" reasons only; to ensure the essential management of each browsing session as well as measurement of performance and analytics; in summary they improve your experience on our website; some last for the duration of each browsing session and others for longer, to improve your future browsing experience. You are able to update your own browser settings to either reject or accept cookies on our site. However, please be aware that by blocking or deleting cookies you may not be able to take full advantage of the site.

#### **4.4. From other third parties, such as our payment system or website analytics portal:** *Reasons for collecting the data listed below include: 3.iv & 3.v.*

- We work closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers and search information providers) and may receive information about you from them.

## 5. HOW WE STORE YOUR PERSONAL INFORMATION, WHEN WE DESTROY IT AND UNDER WHAT CIRCUMSTANCE WOULD WE SHARE IT?

5.1. We hold our records about you using a variety of systems and in the following locations, these are:

- Our website is hosted by WIX, their privacy policy is [here](#).
- Our documents and emails are edited and held through Office 365, for business. This account is secured by a password. The Microsoft privacy policy is [here](#).
- Paper forms, correspondence, and notes. Ultimately, we hold everything electronically however sometimes we need to transcribe or transfer from paper. We aim to do complete this process within 30 days of receipt or creation and, until then we store the paper copy at our main trading address, in a locked cabinet. Once transferred we shred the paper copy.
- We either process payments via our website or in person, using a Zettle card reader. Both providers specialise in the secure capture and processing of credit/debit card transactions. Wix's privacy policy is [here](#), and Zettle privacy policy can be found [here](#).
- Our main trading site is based at a CitiBase premises, CitiBase staff may meet and greet our clients or answer the phones to them, their privacy policy can be found [here](#).

5.2. BetterBody Me will erase information twice each year, on bulk and will keep all client information for a maximum of three years (36 months) and a minimum of two years (24 months) from the date of the last session attended.

We will contact all clients to inform them of the date that their information will be deleted; those clients who have opted in to receive BetterBody Me updates and promotional information will be asked to confirm that they wish to be removed from our mailing list. If they confirm that they do not then we will retail their Name, gender and contact details only. All clients are able to opt out of our mailing list at any time, by contacting us:

- Via email at [info@betterbodyme.co.uk](mailto:info@betterbodyme.co.uk),
- or via post to: 36 Sheraton House, Castle Park, Castle Hill, Cambridge, CB3 0AX.

5.3. BetterBody Me will not disclose your personal information to third parties, without notice, unless required to do so by law or in the good faith belief that such action is necessary to:

- conform to the law or comply with legal process served to BetterBody Me;
- protect and defend the rights or property of BetterBody Me; and,
- act to protect the personal safety of users of BetterBody Me, its staff or the public.

## 6. YOUR DATA PROTECTION RIGHTS

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances. *N.B: For information gained via consent, you **do not** have the right to object.*

**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances. *N.B: You **do not** have the right to request this for information that we store under legitimate interest.*

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. Please contact us:

- Via email at [info@betterbodyme.co.uk](mailto:info@betterbodyme.co.uk),
- or via post to: 36 Sheraton House, Castle Park, Castle Hill, Cambridge, CB3 0AX

## 7. HOW TO COMPLAIN

BetterBody Me takes its responsibilities to collate, store and use personal data appropriately, very seriously. We hope that you never have any concerns about our processes, however in the event that you do then you can make a complaint to us either via email or recorded letter to:

Email address: [daronwilliams@betterbodyme.co.uk](mailto:daronwilliams@betterbodyme.co.uk),

Address: BetterBody Me,  
36 Sheraton House,  
Castle Park,  
Castle Hill,  
Cambridge,  
CB3 0AX

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address is: Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

ICO helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

## 8. VERSION HISTORY & DIRECTOR APPROVAL

**Document Version:** 1.0

**Date of Director approval:** 16<sup>th</sup> June 2021

**Signature of Director:**



**Next review date:** 1<sup>st</sup> July 2022