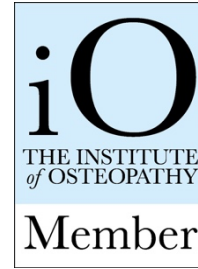


Ikigai Osteopathy Privacy Policy

Scope

This document refers to personal data, which is defined as information concerning any living person (a natural person who hereafter will be called the Data Subject) that is not already in the public domain.



The General Data Protection Regulation (GDPR) which is EU wide and far more extensive than its predecessor the Data Protection Act, along with the Privacy and Electronic Communications Regulations (PECR), seek to protect and enhance the rights of EU data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU and its storage within the EEA.

1 - Ikigai Osteopathy based at 67 Commonwealth Drive, Crawley, West Sussex, RH10 1 AE, and Regans Fight Champions, Brighton Rd, Purley, CR8 2PG, which hereafter for the purposes of this Privacy Notice will be referred to as the Osteopaths, is pleased to provide the following information:

2 - Who we are

The clinic Osteopath diagnoses and treats health conditions. Treatments are carried out in accordance with the Institute of Osteopathy's patient charter <http://www.iosteopathy.org/osteopathy/the-patient-charter/>. Additional treatments of the clinic practitioner include massage, about which we can share more details.

3 - Personal Data

a) For the purposes of providing treatment, the clinic Osteopath may require detailed medical information. We will only collect what is relevant and necessary for your treatment. When you visit our practice, we will make notes which may include details concerning your medication, treatment and other issues affecting your health. This data is always held securely, is not shared with anyone not involved in your treatment, although for data storage purposes it may be handled by pre-vetted staff who have all signed an integrity and confidentiality agreement. To be able to process your personal data it is a condition of any treatment that you give your explicit consent to allow Osteopaths to document and process your personal medical data. Contact details provided by you such as telephone numbers, email addresses, postal addresses may be used to remind you of future appointments and provide reports or other information concerning your treatment.

As part of our obligations as primary healthcare practitioners there may be circumstances related to your treatment, on-going care or medical diagnosis that will require the sharing of your medical records with other healthcare practitioners.

e.g GPs, consultants, surgeons and/or medical insurance companies. Where this is required we will always inform you first unless we are under a legal obligation to comply.

b) For marketing purposes, the Clinic may also use the contact details provided by you to respond to your enquiries, including making telephone contact and emailing information to you which the practice believes may be of interest to you.

c) In making initial contact with the practice you consent to Osteopaths maintaining a marketing dialogue with you until you either opt out (which you can do at any time) or we decide to desist in promoting our

services. The clinic and Osteopath may occasionally also act on behalf of its patients in the capacity of data processor, when we may promote other practitioners based at our premises, who may not be employed by us. Osteopaths do not broker your data, and you can ask to be removed from our marketing database by emailing or phoning the practice using the contact details provided at the end of this Privacy Notice.

d) Some basic personal data may be collected about you from the marketing forms and surveys you complete, from records of our correspondence and phone calls and details of your visits to our website, including but not limited to, personally identifying information like Internet Protocol (IP) addresses.

e) The website uses cookies, which is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. Website visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using the website.

f) The Clinic or Osteopath will only collect the information needed so that we can provide you with the services you require, the business does not sell or broker your data.

g) We may receive data from third parties such as Cliniko, based in Australia, where you book an appointment on our website (See *section 9*)

4 - Legal basis for processing any personal data

To meet our contractual obligations obtained from explicit Patient Consent and legitimate interest to respond to enquiries concerning the services provided.

5 - Legitimate interests pursued by Osteopaths

To promote treatments for patients with all types of health problems indicated for osteopathic care and/or additional treatments provided at the Clinic by the Osteopath.

6 – Consent

Through agreeing to this privacy notice you are consenting to Osteopaths processing your personal data for the purposes outlined. You can withdraw consent at any time to marketing by using the postal, email address or telephone number provided at the end of this Privacy Notice.

7 – Disclosure

The Clinic will keep your personal information safe and secure. Only Osteopaths engaged in providing your treatment will have access to your patient records, although our administration team will have access to your contact details so that they can make appointments and manage your account. Osteopaths will not disclose your Personal Information unless compelled to, to meet legal obligations, regulations or valid governmental requests. The Clinic may also enforce its Terms and Conditions, including investigating potential violations of its Terms and Conditions to detect, prevent or mitigate fraud or security or technical issues; or to protect against imminent harm to the rights, property or safety of its staff.

8 - Retention Policy

Osteopaths will process personal data during the duration of any treatment and will continue to store only the personal data needed for eight years after the contract has expired to meet any legal obligations. After eight years all personal data will be deleted, unless basic information needs to be retained by us to meet our future obligations to you, such as erasure details. Records concerning minors who have received treatment will be retained until the child has reached the age of 25.

9 – International transfers

Countries outside of the European Economic Area (EEA) do not always offer the same levels of protection to your personal data, so European law has prohibited transfers of personal data outside of the EEA unless the transfer meets certain criteria. Some of our third parties service providers are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA. Whenever we transfer your personal data out of the EEA, we do our best to ensure a similar degree of security of data by ensuring at least one of the following safeguards is in place:

- We will only transfer your personal data to countries that the European Commission have approved as providing an adequate level of protection for personal data by; or
- Where we use certain service providers, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe; or
- If we use US-based providers that are part of EU-US Privacy Shield, we may transfer data to them, as they have equivalent safeguards in place. If none of the above safeguards is available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

10 - Your rights as a data subject

At any point whilst Osteopaths are in possession of, or processing your personal data, all data subjects have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply you have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right not to be subject to the legal effects of automated processing or profiling.

If Osteopaths refuses your request under rights of access, we will provide you with a reason as to why, which you have the right to legally challenge. At your request Osteopaths can confirm what information it holds about you and how it is processed.

11 - You can request the following information:

- Identity and the contact details of the person or organisation (Osteopaths) that has determined how and why to process your data.

- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Osteopaths and information about these interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- How long the data will be stored.
- Details of your rights to correct, erasure, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority (ICO).
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

12 - To access what personal data is held, identification will be required

Osteopaths will accept the following forms of identification (ID) when information on your personal data is requested: a copy of your driving licence, passport, birth certificate and a utility bill not older than three months. A minimum of one piece of photographic ID listed above and a supporting document is required. If the Osteopath is dissatisfied with the quality, further information may be sought before personal data can be released. All requests should be made to info@ikigaiosteopathy.com or by phoning 01293 207112 or writing to us at 67 Commonwealth Drive, Crawley, West Sussex, RH10 1AE.

13 How we collect or obtain personal information about you:

We collect personal information when you provide it to us:

- When you fill in a form on our website
- When you contact us by phone, email or in writing
- When you use our AI Chatbot Assistant on the website
- When you use post or react to our social media channels
- When you order goods or services from us

Where permitted by law we may also receive information about you from third parties such as affiliates, business partners, credit and fraud checking services as well as third parties with whom we have had no prior contact.

14 How we collect anonymous information about your behaviour:

We indirectly collect anonymous information about you to get a general idea of how our website is performing, this information is not linked directly to you but third-party services outside of our control may use this to profile your activities and provide relevant advertising in other platforms. This may occur at any time while you are browsing our website.

a) Cookies

Cookies are small packets of information stored on your device used to keep a record of your history while using a particular website. This could be used to tailor page content to your past behaviour, to keep hold of information that lets us know if you've logged in, or to let us know what items you've added to a shopping cart. The cookies under our control are only visible to you and to our website. While you are free to disable cookies on your browser, doing so may impact the functionality of this and other websites you visit and as such is not recommended.

b) Third Party Cookies

We use other services to help us to deliver our website, and they may also store cookies on your device to display personalised content or to gather statistics while you are visiting our website. We'll list those in detail and give a brief overview of why and how we use them below.

c) How do I delete the cookies?

If you do not want to receive cookies from this website, select cookie settings under the privacy settings in your browser options, add our domain to the list of websites you do not want to accept cookies from.

Under settings you can also delete individual cookies or any cookies that your browser has stored. You can find more information on how to delete and control cookies at [All about cookies](#) and [About cookies](#). If you set your browser to refuse cookies, some functionality on various websites may not work.

If you do leave cookies turned on, make sure you log or sign out, especially when using a shared computer. It is good web practice to close your browser.

d) Contact Forms

Information you submit to us on a contact form will be sent by email to our staff and will remain stored on the website or within backups for a maximum of 60 days just in case the email doesn't get to us. If we intend to retain information for marketing purposes we'll ask you first and give details on the form.

e) User submitted Comments & Reviews

You can submit comments on our content if you want to. Normal visitors will be able to read anything that you post, and the name under which you have submitted the comment. You may use a pseudonym if you prefer to remain anonymous.

f) Newsletters

Visitors can subscribe to our newsletters and marketing material. We offer various newsletter signup forms on our site. In the case of forms which are purely for this purpose and clearly labelled as such, consent is assumed, and a double opt-in email may be sent out for confirmation before you are officially subscribed to any lists.

Please follow the instructions on any emails sent if you wish to unsubscribe or change your communication preferences.

15 Third-Party Services we may share data with:

Third Party Analysis Tools

We use the following third-party services to track and monitor visitor flows and behaviour.

a) Google Analytics

Google analytics provides us with detailed web statistics and real time monitoring to help us measure the performance of our web site. Google's privacy policy is available in full at <https://www.google.com/policies/privacy/>

b) Social Media Services

Some pages of our web site may connect with the following social media services. These may use third party cookies to connect with your own account to provide personalised content.

Facebook

We use functionality from Facebook to display personalised content, or to allow you to share content with your friends. We do not have any direct access to information relating to your Facebook account. For detail on Facebook's privacy policy please visit <https://www.facebook.com/privacy/explanation>

Instagram

We use functionality from Instagram to display personalised content, or to allow you to share content with your friends. We do not have any direct access to information relating to your Instagram account. For detail on Facebook's privacy policy please visit <https://help.instagram.com/termsofuse>

Email Communication Services

We may use email services to send emails, which will indirectly have access to a portion of your activity and some of your personal details. Once an email leaves systems we use directly, it may be routed through any number of other systems.

Mailchimp

We use Mailchimp to maintain our mailing lists and to send promotional material. Mailchimp's privacy policy can be found at <https://mailchimp.com/legal/privacy/>

16 Complaints

If you wish to make a complaint about how your personal data is being processed by Osteopaths you have the right to complain to us. If you do not get a response within 30 days, you can complain to the ICO.

The details for each of these contacts are:

George Hopkins (Principal Osteopath), Ikigai Osteopathy, 67 Commonwealth Drives, Crawley, West Sussex, RH10 1AE

Telephone: 01293 207112 Email: info@ikigaiosteopathy.com

ICO : Wycliffe House, Water Lane, Wilmslow, SK9 5AF Telephone +44 (0) 303 123 1113 or email: <https://ico.org.uk/global/contact-us/email/>

T: 01293 207112 | E: info@ikigaiosteopathy.com | W: www.ikigaiosteopathy.com