

## 24hr Therapy (Camline Enterprises Ltd)

### GDPR Policy

Camline Enterprises Ltd, a company registered in England and Wales, with company number 14444669 (we, us or our), understands that protecting your personal data is important. This GDPR Policy sets out our commitment to protecting the privacy of personal data provided to us, or otherwise collected by us when providing our therapy services (Services) or when otherwise interacting with you.

It is important that you read this GDPR Policy together with any other detailed privacy notices we may provide when we are collecting or processing personal data about you so that you understand our privacy practices in relation to your data.

#### **The Information We Collect**

**Personal data:** Personal data is information that relates to an identified or identifiable individual.

We may collect, use, store, and disclose different kinds of personal data about you which we have listed below:

- **Identity Data:** [first name, last name, title, date of birth, gender].
- **Contact Data:** [address, email address, telephone number].
- **Financial Data:** [bank account details, payment card details].
- **Transaction Data:** [details about payments to and from you, and other details of services you have purchased from us].
- **Technical and Usage Data:** [IP address, login data, browser session and geolocation data, device and network information, statistics on page views and sessions, acquisition sources, search queries and/or browsing behaviour, information about your access and use of our website, including through the use of Internet cookies, your communications with our website, the type of browser you are using, the type of operating system you are using and the domain name of your Internet service provider].
- **Marketing and Communications Data:** [your preferences in receiving marketing from us and our third parties, and your communication preferences].
- **Professional Data:** [your professional history such as your previous positions and professional experience if you are applying for a role with us].
- **Special Categories of Personal Data:** This includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data. The types of special categories of data we collect include:
  - **Health Data:** [the type of therapy you require; and clinical notes from your appointment with us, including observations, diagnoses, and your medication].

## How We Collect Personal Data

We collect personal data in a variety of ways, including:

- **Directly:** We collect personal data which you directly provide to us, including when you register for an account, through the ‘contact us’ form on our website, or when you request our assistance via email, or over the telephone.
- **Indirectly:** We may collect personal data which you indirectly provide to us while interacting with us, such as when you use our website, in emails, over the telephone, and in your online enquiries.
- **From third parties:** We collect personal data from third parties, such as from your general practitioner or other healthcare professionals, and details of your use of our website from our analytics and cookie providers and marketing providers. See the “Cookies” section below for more detail on the use of cookies.

## Purposes and Legal Bases for Processing

We collect and process personal data about you only where we have legal bases for doing so under applicable laws. We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. 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 reach out to us if you need further 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 of use/disclosure	Categories of Data	Legal Basis for Processing
To enable you to access and use our services, including to provide you with a login.	Identity Data, Contact Data	Performance of a contract with you
To provide our Services to you, including to determine the best therapist to provide Services to you.	Identity Data, Contact Data, Health Data	Performance of a contract with you
To contact and communicate with you about any enquiries you make with us via our website.	Identity Data, Contact Data	Legitimate interests: to ensure we provide the best client experience we can offer by answering all of your questions.
For internal record keeping, administrative, invoicing, and billing purposes.	Identity Data, Contact Data, Financial Data, Transaction Data	Performance of a contract with you, To comply with a legal obligation, Legitimate interests:

Purpose of use/disclosure	Categories of Data	Legal Basis for Processing
		to recover debts due to us and ensure we can notify you about changes to our terms of business and any other administrative points
For analytics, market research, and business development, including to operate and improve our Services.	Technical and Usage Data	Legitimate interests: to keep our website updated and relevant, to develop our business, improve our Services, and to inform our marketing strategy
For advertising and marketing, including to send you promotional information about our events and experiences and information that we consider may be of interest to you.	Identity Data, Contact Data, Technical and Usage Data, Marketing and Communications Data	Legitimate interests: to develop our Services and grow our business
If you have applied to work with us; to consider your application.	Identity Data, Contact Data, Professional Data	Legitimate interests: to consider your employment application
To comply with our legal obligations or if otherwise required or authorised by law.	All data	To comply with a legal obligation

If you have consented to our use of data about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your data because we or a third party have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean no longer using our services. Further information about your rights is available below.

### **Our Disclosures of Personal Data to Third Parties**

We may disclose personal data to:

- our employees, contractors and/or related entities;
- IT service providers, data storage, web-hosting and server providers such as Amazon Web Services;
- marketing or advertising providers;
- professional advisors, bankers, auditors, our insurers and insurance brokers;
- payment systems operators such as [e.g., Stripe, PayPal];
- our existing or potential agents or business partners;

- anyone to whom our business or assets (or any part of them) are, or may (in good faith) be, transferred;
- courts, tribunals and regulatory authorities, in the event you fail to pay for goods or services we have provided to you;
- courts, tribunals, regulatory authorities and law enforcement officers, as required or authorised by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights;
- third parties to collect and process data, such as Google Analytics (To find out how Google uses data when you use third party websites or applications, please see [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/) or any other URL Google may use from time to time), Facebook Pixel or other relevant analytics businesses; and
- any other third parties as required or permitted by law, such as where we receive a summons.

### **Overseas Transfers**

Where we disclose personal data to the third parties listed above, these third parties may store, transfer, or access personal data outside of the United Kingdom. The level of data protection in countries outside of the United Kingdom may be less comprehensive than what is offered in the United Kingdom. Where we transfer your personal data outside of the United Kingdom, we will perform those transfers using appropriate safeguards in accordance with the requirements of applicable data protection laws and we will protect the transferred personal data in accordance with this Privacy Policy. This includes:

- only transferring your personal data to countries that have been deemed by applicable data protection laws to provide an adequate level of protection for personal data; or
- including standard contractual clauses in our agreements with third parties that are overseas.

### **Data Retention**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect of our relationship with you.

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, regulatory, tax, accounting, or other requirements.

## **Your Rights and Controlling Your Personal Data**

**Your choice:** Please read this Privacy Policy carefully. If you provide personal data to us, you understand we will collect, hold, use and disclose your personal data in accordance with this Privacy Policy. You do not have to provide personal data to us; however, if you do not, it may affect our ability to provide our Services to you and your use of our Services.

**Information from third parties:** If we receive personal data about you from a third party, we will protect it as set out in this Privacy Policy.

Date: 19/07/2024

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