



RELAX • REBALANCE • REVITALISE

Privacy Policy

Reflexology by Michele

This policy explains how I collect, use, store and protect personal information when you enquire about, book or receive reflexology, holistic facials or my other holistic treatments.

Who is responsible for your information

I am Michele Rigby, trading as Reflexology by Michele. I am the data controller responsible for the personal information I use in running my practice.

- **Address:** 8 Alexandra Road, Market Drayton, TF9 3HU
- **Email:** michele@reflexologybymichele.co.uk
- **Telephone:** 07801 670638

Information I collect and where it comes from

I collect the information needed to respond to enquiries, manage appointments, provide appropriate treatments and keep necessary business records. This includes:

- Your name and contact details, appointment history and correspondence.
- Relevant medical history, health information, consultation answers, treatment details and notes.
- Payment and transaction records, and any recorded communication or marketing preferences.

Most information comes directly from you, including through Fresha, consultation forms, conversations and messages. I also create treatment notes. If you have difficulty completing a digital form, I may complete it with you or use a paper form and digitise it afterwards.

Why I use your information

I use information to arrange and provide treatments, assess their suitability, keep a record of your care, send appointment communications, answer questions and manage payments. I also retain necessary records for accounting, insurance and the establishment or defence of legal claims.

Marketing is a separate purpose. Any promotional communications are subject to the permissions and choices described below.

Legal bases for using your information

For enquiries made with a view to booking, appointment administration and providing agreed services, I rely on taking steps at your request before a contract or performing our contract, under Article 6(1)(b) of the UK GDPR.

For necessary records supporting continuity of care, insurance and legal claims, I rely on legitimate interests under Article 6(1)(f). Those interests are providing a safe, accountable service and protecting the practice against claims, balanced against your privacy rights. For records required by tax and accounting law, I rely on legal obligation under Article 6(1)(c).

Additional protection for health information

Health information is special category data and requires an additional legal condition. For information necessary to provide health care or treatment, I rely on Article 9(2)(h), subject to the confidentiality safeguards in Article 9(3) and the Data Protection Act 2018.

I follow the Association of Reflexologists' guidance for members and its Code of Practice and Ethics on confidentiality. This guidance supports members' use of the health-care condition for relevant treatment information.

Where retaining or using health information is necessary to establish, exercise or defend legal claims, I rely on Article 9(2)(f). I limit the information used to what is necessary for that purpose.

Relevant health information and treatment records are needed to assess whether treatment is appropriate and to provide it safely. If you choose not to provide necessary information, I may be unable to offer a treatment.

Marketing and your choices

If you choose to receive them, I may send occasional emails with seasonal news, treatment information and invitations to book. I rely on your consent under Article 6(1)(a) of the UK GDPR and keep a record of your choice. Agreeing to marketing is optional and does not affect your treatment.

You can withdraw consent or object to marketing at any time by using the unsubscribe option in an email or contacting me. I will stop promotional messages and keep only the information needed to record and respect your choice. I rely on my legitimate interest in preventing unwanted contact for this minimal record. Appointment confirmations, reminders, rearrangements and necessary treatment communications are separate from marketing.

Who receives your information

I use Fresha for bookings and digital consultation records, and Microsoft OneDrive to store historical scanned consultation forms. These providers process information to deliver their services; their own privacy notices explain any processing they undertake for their own purposes.

Relevant information may also be disclosed where necessary to an insurer, professional adviser or authority for a claim or legal requirement. I share information for a referral to another

practitioner only with your knowledge and specific agreement, unless another lawful justification requires disclosure.

Provider privacy notices: <https://terms.fresha.com/privacy-policy> and <https://www.microsoft.com/en-gb/privacy/privacystatement>.

Storage and access

Consultation forms are generally stored in Fresha. Historical scanned forms are stored in OneDrive and accessed through my password-protected computer. Access to these files is restricted to me. Paper consultation forms are shredded after digitisation.

Fresha and Microsoft may process information outside the UK, including in the United States. Fresha states that it uses recognised transfer mechanisms, including the UK International Data Transfer Agreement or UK Addendum where required. Microsoft describes safeguards including standard contractual clauses and participation in the UK Extension to the EU-US Data Privacy Framework. Their privacy notices explain these arrangements. Contact me to request further information or a copy of the relevant safeguards.

How long I keep information

I normally keep treatment records for seven years after your last treatment, meeting the minimum period required by my Balens insurance. For clients treated under 18, I follow Balens' advice to retain records until at least age 25, or seven years after the last treatment if that is later. This applies to records in both Fresha and OneDrive.

Records may need to be kept longer where necessary for an ongoing complaint, legal claim or applicable legal requirement. I review the reason for any extended retention and do not keep records indefinitely without justification.

Financial records are retained for the period required by applicable tax and accounting law. Enquiries that do not lead to treatment are retained only for as long as needed to deal with the enquiry and any related issue. Marketing preferences are kept for as long as needed to manage permission and respect objections.

When the retention period ends and there is no continuing justification, I securely delete records under my control from the relevant systems. This includes reviewing both Fresha and OneDrive records. Backup and recovery copies are subject to the relevant provider's deletion processes.

Your data protection rights

Depending on the circumstances and legal basis, you can ask to access your information, correct inaccuracies, erase information, restrict its use or receive and transfer information covered by the right to data portability. Erasure is not an absolute right: some records may still need to be retained for a lawful reason, which I will explain.

You have the right to object to processing based on legitimate interests. You have an absolute right to object to use of your information for direct marketing; I will stop that use when you object.

Where I rely on consent, you may withdraw it at any time by contacting me. Withdrawal does not affect the lawfulness of processing before it was withdrawn.

Contact me using the details on the first page to exercise your rights. Requests are normally free of charge and answered within one month. If a lawful extension, clarification or other exception applies, I will explain it. I may need information to confirm your identity.

How to complain

Please contact me by email, telephone or post if you have a concern about my use of your personal information. I will acknowledge a data protection complaint within 30 days, investigate appropriately, keep you informed and communicate the outcome without undue delay.

You also have the right to complain to the Information Commissioner's Office. Website: ico.org.uk/make-a-complaint. Telephone: 0303 123 1113. Postal address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Keeping this policy up to date

I review this policy when my services or information-handling arrangements change and will bring significant changes to clients' attention. A copy is available on request.