



## PRIVACY POLICY – 24 May 2018

Elaine Copeland is the Data Controller and Processor of personal information held about you.

Elaine respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how she looks after your personal data when you visit her website (regardless of where you visit it from) as well as where she interacts in the course of her business and tell you about your privacy rights and how the law protects you.

The data Elaine collects about you:

‘Personal data’, or ‘personal information’, means any information about an individual from which that person can be identified.

She may collect, use, store and transfer different kinds of data about you which are grouped together follows:

‘Identity Data’ includes first name, last name or company. When you enquire about her services and during the course of providing services to you she may collect the following personal information:

Your home address, date of birth and health information, your likes, dislikes and preferences;

‘Contact Data’ includes billing address, delivery address, email address and telephone numbers;

‘Financial Data’ includes bank account and payment card details;

‘Transaction Data’ includes details about payments to and from you and other details of products and services you have purchased from her;

‘Technical Data’ includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website;

‘Profile Data’ includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses;

‘Usage Data’ includes information about how you use this website, products and services;

‘Marketing and Communications Data’ includes your preferences in receiving marketing from Elaine and your communication preferences.

### How is your personal data collected?

Elaine uses different methods to collect data from and about you including through:

*Direct interactions.* You may give your data by filling in forms on this website or by corresponding by post, phone, email or otherwise. This includes personal data you provide when you:

apply for services;  
attend treatment sessions with Elaine;  
subscribe to service or publications;  
request marketing to be sent to you;  
leave a comment on this website;  
enter a competition, promotion or survey; or  
give feedback.

#### *Automated technologies or interactions*

As you interact with this website, it may automatically collect Technical Data about your equipment, browsing actions and patterns. The website collects this personal data by using cookies and other similar technologies. It may also receive Technical Data about you if you visit other websites employing our cookies. Please see our [cookie policy below](#).

#### How your personal data and special category data is used

Elaine respects your privacy will only use your personal data when the law allows her to. Most commonly, she will use your personal data in the following circumstances:

Where she needs to fulfil the contract you are about to enter into with her or have entered into with her.

Where it is necessary for legitimate interests and your interests and fundamental rights do not override those interests.

Where she needs to comply with a legal or regulatory obligation.

Where processing is necessary for the purposes of preventative or occupational medicine and the provision of health treatment – referring to complementary health/counselling that supports mental and physical health. ([Article 9\(2\)\(h\) of the GDPR for special category data](#))

#### 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. Elaine does not control these third-party websites and is not responsible for their privacy statements. When you leave this website, you are encouraged to read the privacy notice of every website you visit.

#### Opting out

You can ask Elaine or third parties to stop sending you marketing messages at any time by following the opt-out or unsubscribe links on any marketing message sent to you or by contacting us at any time.

GDPR requires Data Controllers and Processors to maintain a restricted record of Contact and Identity Data where you have opted out of receiving marketing and this is to prevent any future marketing being carried out and, unless otherwise informed, no other processing shall be carried out in relation to this information.

### 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, please see the [cookies policy](#) at the end of this privacy notice.

### Data security

Appropriate security measures are in place to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, access to your personal data is limited to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data under instructions and they are subject to a duty of confidentiality and data sharing agreement.

Elaine has put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where legally required to do so.

### Data retention

Elaine will retain your personal data for as long as necessary to fulfil the purposes it is collected for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, Elaine considers 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 she process your personal data and whether she can achieve those purposes through other means, and the applicable legal requirements.

### YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data held about you and to check that it is being lawfully processed;

Request correction of the personal data that held about you. This enables you to have any incomplete or inaccurate data about you corrected, though you may need to verify the accuracy of the new data you provide;

Request erasure of your personal data. This enables you to request deletion or removal of personal data where there is no good reason for it continuing to be processed. You also have the right to ask for deletion or removal of your personal data where you have successfully exercised your right to object to processing, where your data may have been processed unlawfully or where the Data Processor or Controller is required to erase your personal data to comply with local law. Note, however, that your request of erasure may not always be upheld for specific legal reasons which will be notified to you, if applicable, at the time of your request. Please note that if you request deletion any of your personal information which is necessary to comply with contractual or legal obligations, care and support services may no longer be able to be supplied to you;

Object to processing of your personal data where it relies on a legitimate interest (or those of a third party). In some cases, Elaine may demonstrate that she has compelling legitimate grounds to process your information which override your rights and freedoms.

Where you object she shall maintain a restricted record of Contact and Identity Data recording what you have opted out of and will ensure that no future data processing is carried out, unless required under law.

Request restriction of processing of your personal data. This enables you to ask Elaine to suspend the processing of your personal data in the following scenarios: (a) if you want to establish the data's accuracy; (b) where use of the data is unlawful but you do not want us to erase it; (c) where you wish the data to be held even if Elaine no longer requires it as you need it to establish, exercise or defend legal claims; or (d) you have objected to the use of your data but Elaine needs to verify whether she have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. Elaine will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where the information is used to perform a contract with you;

Withdraw consent at any time where consent is needed to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, Elaine may not be able to provide certain products or services to you. You will be advised if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please get in [contact](#).

A nominal administration fee may be charged to access your personal data (or to exercise any of the other rights). Alternatively, Elaine may refuse to comply with your request in these circumstances.

Elaine 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). Elaine may also contact you to ask you for further information in relation to your request to speed up our response.

### Time limit to respond

Elaine will 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, she will notify you and keep you updated.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). Elaine would, however, appreciate the chance to deal with your concerns before you approach the ICO so please [contact her](#) in the first instance.

### COOKIES POLICY

This website is hosted by Wordpress. You can view their [cookie policy](#) and their [privacy policy](#) by clicking on these links.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of this site.

Cookies can expire at the end of a browser session or they can be stored for longer. Your browser settings can also enable you to clear cookies on exit from specified websites.

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