



PRIVACY POLICY & COOKIES POLICY

Our website accessible at <https://massagerenewal.uk/> (**our website**) is provided by Massage Renewal Ltd, a company registered in England and Wales (company number 13650986), with a registered office at 20-22 Wenlock Road, London, N1 7 GU (**'we', 'our' or 'us'**). We are the controller of Personal Data obtained via our website, meaning we are the organisation legally responsible for deciding how and for what purposes it is used.

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share any information relating to you (your **Personal Data**) in connection with your use of our website. It also explains your rights in relation to your Personal Data and how to contact us or a relevant regulator in the event you have a complaint.

We collect, use and are responsible for certain Personal Data about you. When we do so we are subject to the UK General Data Protection Regulation (**UK GDPR**).

Given the nature of our website, we do not expect to collect the Personal Data of anyone under 18 years old. If you are aware that any Personal Data of anyone under 18 years old has been shared with our website please let us know so that we can delete that data.

This privacy policy is divided into the following sections:

- What this policy applies to
- Personal Data we collect about you
- Sensitive Personal Data we collect about you
- How your Personal Data is collected
- How and why we use your Personal Data
- Marketing
- Who we share your Personal Data with

- How long your Personal Data will be kept
- Transferring your Personal Data out of the UK
- Cookies
- Your rights
- Keeping your Personal Data secure
- How to complain
- Changes to this privacy policy
- How to contact us

What this policy applies to

This privacy policy relates to your use of our website only.

Throughout our website we may link to other websites owned and operated by certain trusted third parties to make additional products and services available to you. Those third party websites may also gather information about you in accordance with their own separate privacy policies. For privacy information relating to those third party websites, please consult their privacy policies as appropriate.

Personal data we collect about you

The Personal Data we collect about you depends on the particular activities carried out through our website. We will collect and use the following Personal Data about you:

- your name, address and contact information, including email address and telephone number and location
- information to check and verify your identity, eg date of birth
- your billing information, transaction and payment card or other payment method information
- details of any information, feedback or other matters you give to us by phone, email, post or via social media
- your account details, such as username and login details
- your activities on, and use of, our website
- information about the services we provide to you
- your contact history, purchase history and saved items
- information about how you use our website and technology systems
- your responses to surveys and questionnaires

Special Category Personal Data or Sensitive Data

Certain Personal Data we collect is treated as a 'special category' to which additional protections apply under data protection law. This is also known as 'Sensitive Data'. Where we process such Sensitive Data, we will also ensure we are permitted to do so under data protection laws, and any such data will be collected on the basis of your consent. Sensitive Data we collect about you, where you choose to give it to us, may include:

- Medical history and medical information
- Existing conditions: allergies, chronic pains, chronic illnesses, ongoing treatments such as current medications consumed
- Weight, height, age,
- your gender and sex - if you choose to give this to us
- Lifestyle details: hours spent driving and when, interaction with heavy machinery, childcaring

If you do not provide Personal Data we ask for where it is asked, it may prevent us from providing our services to you. We collect and use this Personal Data for the purposes described in the section '**How and why we use your Personal Data**' below.

How your Personal Data is collected

We collect Personal Data from you:

- directly, when you enter or send us information, such as when you register with us, contact us (including via email), send us feedback, purchase or request services via our website, post material to our website and complete patient surveys, and
- indirectly, such as your browsing activity while on our website; we will usually collect information indirectly using the technologies explain in the section on '**Cookies**' below

How and why we use your Personal Data

Under data protection law, we can only use your Personal Data if we have a proper reason, eg:

- where you have given consent
- to comply with our legal and regulatory obligations
- for the performance of a contract with you or to take steps at your request before entering into a contract, or
- for our legitimate interests or those of a third party

A legitimate interest is when we have a business or commercial reason to use your Personal Data, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own. You can obtain details of this assessment by contacting us (see '**How to contact us**' below).

The table below explains what we use your Personal Data for and why.

What we use your Personal Data for	Our reasons
Create and manage your account and patient file with us	<p>For our legitimate interests, ie to be as efficient as we can so we can deliver the best service to you</p> <p>To perform our contract with you or to take steps at your request before entering into a contract</p>
Providing services to you	To perform our contract with you or to take steps at your request before entering into a contract
Conducting checks to identify you and verify your identity or to help prevent and detect fraud against you or us	<p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests, ie to minimise fraud that could be damaging for you and/or us</p>
To enforce legal rights or defend or undertake legal proceedings	<p>Depending on the circumstances:</p> <p>—to comply with our legal and regulatory obligations</p> <p>—in other cases, for our legitimate interests, ie to protect our business, interests and rights</p>
Customise our website and its content to your particular preferences based on a record of your selected preferences or on your use of our website	<p>Depending on the circumstances:</p> <p>—your consent as gathered by the tool on our website - see 'Cookies' below</p> <p>—where we are not required to obtain your consent and do not do so, for our legitimate interests, ie to be as efficient as we can so we can deliver the best service to you</p> <p>If you have provided such a consent you may withdraw it at any time by changing the setting on the cookie tool (this will not affect the lawfulness of our use of your Personal Data in reliance on that consent before it was withdrawn)</p>
Retaining and evaluating information on your recent visits to our website and how you move around different sections of our website for analytics purposes to understand how people use our website so that we can make it more intuitive or to check our website is working as intended	<p>Depending on the circumstances:</p> <p>—your consent as gathered by the separate cookies tool on our website—see 'Cookies' below</p> <p>—where we are not required to obtain your consent and do not do so, for our legitimate interests, ie to be as efficient as we can so we can deliver the best service to you</p>

What we use your Personal Data for	Our reasons
	If you have provided such a consent you may withdraw it at any time by changing the setting on the cookie tool (this will not affect the lawfulness of our use of your Personal Data in reliance on that consent before it was withdrawn)
Communications with you not related to marketing, including about changes to our terms or policies or changes to the services and/or other important notices	Depending on the circumstances: —to comply with our legal and regulatory obligations —in other cases, for our legitimate interests, ie to be as efficient as we can so we can deliver the best service to you
Protecting the security of systems and data used to provide the services	To comply with our legal and regulatory obligations We may also use your Personal Data to ensure the security of systems and data to a standard that goes beyond our legal obligations, and in those cases our reasons are for our legitimate interests, ie to protect systems and data and to prevent and detect criminal activity that could be damaging for you and/or us
Statistical analysis to help us understand our patient base	For our legitimate interests, ie to be as efficient as we can so we can deliver the best service to you at the best price
Updating and enhancing client records	Depending on the circumstances: —to perform our contract with you or to take steps at your request before entering into a contract —to comply with our legal and regulatory obligations —where neither of the above apply, for our legitimate interests, eg making sure that we can keep in touch with our patients about existing consultations, services and new services and products
Disclosures and other activities necessary to comply with legal and regulatory obligations that apply to our business	To comply with our legal and regulatory obligations

What we use your Personal Data for	Our reasons
Marketing our services to existing and former patients	For our legitimate interests, ie to promote our business to existing and former patients See ' Marketing ' below for further information
The audit of our accounts and business	For our legitimate interests, ie to maintain any accreditations so we can demonstrate we operate at the highest standards
To share your Personal Data with members of our group and third parties that will or may take control or ownership of some or all of our business (and professional advisors acting on our or their behalf) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency In such cases information will be anonymised where possible and only shared where necessary	Depending on the circumstances: —to comply with our legal and regulatory obligations —in other cases, for our legitimate interests, ie to protect, realise or grow the value in our business and assets

How and why we use your Personal Data—sharing

See '**Who we share your Personal Data with**' for further information on the steps we will take to protect your Personal Data where we need to share it with others.

Marketing

We will use your Personal Data to send you updates by email, text message, telephone or post about our services, including exclusive offers, promotions or new services.

We have a legitimate interest in using your Personal Data for marketing purposes (see above '**How and why we use your Personal Data**'). This means we do not need your consent to send you marketing information. If we change our marketing approach in the future so that consent is needed, we will ask for this separately and clearly.

You have the right to opt out of receiving marketing communications at any time by:

- contacting us at **[insert]**
- using the 'unsubscribe' link in emails

We may ask you to confirm or update your marketing preferences if you ask us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

We will always treat your Personal Data with the utmost respect and never sell with other organisations outside the Massage Renewal group for marketing purposes.

For more information on your right to object at any time to your Personal Data being used for marketing purposes, see '**Your rights**' below.

Who we share your Personal Data with

We routinely share Personal Data with:

- third parties we use to help deliver our services to you, eg, third party service providers (such as website developers or payment providers, or providers of security infrastructure)
- other third parties we use to help us run our business, eg website hosts and website analytics providers

We only allow those organisations or individuals to handle your Personal Data if we are satisfied they take appropriate measures to protect your Personal Data. We also impose contractual obligations on them to ensure they can only use your Personal Data to provide services to us and to you.

We or the third parties mentioned above occasionally also share Personal Data with:

- our and their external auditors, eg in relation to the audit of our accounts, in which case the recipient of the information will be bound by confidentiality obligations
- our and their professional advisors (such as lawyers and other advisors), in which case the recipient of the information will be bound by confidentiality obligations
- law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations
- other parties that have or may acquire control or ownership of our business (and our or their professional advisers) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency—usually, information will be anonymised but this may not always be possible. The recipient of any of your Personal Data will be bound by confidentiality obligations

Who we share your Personal Data with—further information

If you would like more information about who we share our data with and why, please contact us (see '**How to contact us**' below).

How long your Personal Data will be kept

We will not keep your Personal Data for longer than we need it for the purpose for which it is used. For example, we will usually keep data for 6 years in order to comply with our legal and tax obligations.

Following the end of the of the relevant retention period, we will delete or anonymise your Personal Data.

Transferring your Personal Data out of the UK

Countries outside the UK have differing data protection laws, some of which may provide lower levels of protection of privacy.

It is sometimes necessary for us to share your Personal Data with countries outside the UK. In those cases we will comply with applicable UK laws designed to ensure the privacy of your Personal Data.

We may transfer your Personal Data to our service providers and website and website hosts located outside the UK

Under data protection laws, we can only transfer your Personal Data to a country outside the UK where:

- In the case of transfers subject to UK data protection law, the UK government has decided the particular country ensures an adequate level of protection of Personal Data (known as an '**adequacy regulation**') further to Article 45 of the UK GDPR. A list of countries the UK currently has adequacy regulations in relation to is available [here](#).
- there are appropriate safeguards in place in the form of Standard Contractual Clauses signed by the party in question, together with enforceable rights and effective legal remedies for you, or
- a specific exception applies under relevant data protection law

Where we transfer your Personal Data outside the UK we do so on the basis of an adequacy regulation or (where such is not available) on the basis of legally-approved standard data protection clauses recognised or issued further to Article 46(2) of the UK GDPR. In the event we cannot or choose not to continue to rely on either of those mechanisms at any time we will not transfer your Personal Data outside the UK unless we can do so on the basis of an alternative mechanism or exception provided by UK data protection law and reflected in an update to this policy.

Any changes to the destinations to which we send Personal Data or in the transfer mechanisms we use to transfer Personal Data internationally will be notified to you in accordance with the section on '**Change to this privacy policy**' below.

Further information

If you would like further information about data transferred outside the UK please contact us and/or our Data Protection Officer (see '**How to contact us**' below).

Cookies and other tracking technologies

A cookie is a small text file which is placed onto your device (eg computer, smartphone or other electronic device) when you use our website. We use cookies on our website. These help us recognise you and your device and store some information about your preferences or past actions and allow you to select and view products, place them in the cart on our website and allow you to proceed to checkout.

Cookies: Consent to use cookies and changing settings

We will ask for your consent to place cookies or other similar technologies on your device, except where they are essential for us to provide you with a service that you have requested (e.g. to keep you logged into your account as you navigate the website).

You can withdraw any consent to the use of cookies or manage any other cookie preferences by using the tools on any page of our website and/or interacting with our cookies banner. You can then adjust your settings as appropriate. It may be necessary to refresh the page for the updated settings to take effect.

Our use of cookies

The table below provides more information about the cookies we use on our website and portal, and why:

Name	Purpose
Strictly Necessary Cookies	Certain cookies we use are essential for the proper functioning of our website, without which our website won't work or certain features won't be accessible to you. For example, we may need to remember data you've inputted from one page to the next in a single session.
Performance Cookies	Performance cookies collect information about your use of the Website to help enhance the services we provide to you. We collect information about how you interact with the Website, including the pages you visit and the frequency of your visits. This information helps us identify patterns of usage on the site, collect analytics data, identify issues you may have had on the Website, make changes to enhance your browsing experience, and analyse if our marketing is effective and relevant to you.
Functional Cookies	We use functional cookies to improve your experience on our website and make things more convenient for you. These cookies personalise your experience on our website based on your preferences, by remembering your details such as your login details or region. Security cookies are a type of functional cookie, which assist with website and user account security. Load balancing session cookies are used for the duration of the session to distribute user requests across multiple servers to optimize website speed and capacity. We may also use user interface customization persistent cookies to store a user's preferred version of our website, such as font and language preferences.
Advertising cookies	Advertising cookies are used on our website to provide you with targeted marketing materials in accordance with your interests and preferences. These cookies remember that you visited our website, and we may provide this information to third-parties. These cookies usually cannot personally identify you, so your anonymity is typically secured. These cookies ensure that advertisements displayed to you are things that may be of interest to you.
Content cookies	Content cookies are placed by many social media plugins (like plugins that allow you to share content on Facebook), and other tools to enhance the content displayed on a website (for example, services that allow the playing of video files). We integrate these plugins into our website to improve usability and customer experience. Some of these third party services may place cookies that are also used for the purposes of behavioural advertising or market analysis.

How to turn off all cookies and consequences of doing so

If you do not want to accept any cookies or if you want to change your settings and cookies preferences with us, you can do so at any time via the 'Cookies button' on our website or via your account on our portal. You may be able to change your browser settings so that cookies (including those which are

essential to the services requested) are not accepted. If you do this, please be aware that you may lose some of the functionality of our website and other sites you visit.

For further information about cookies and how to disable them please go to the [guidance on cookies](#) published by the UK Information Commissioner's Office, www.aboutcookies.org or www.allaboutcookies.org.

Your rights

You generally have the following rights, which you can usually exercise free of charge:

Access to a copy of your Personal Data	The right to be provided with a copy of your Personal Data
Correction (also known as rectification)	The right to require us to correct any mistakes in your Personal Data
Erasure (also known as the right to be forgotten)	The right to require us to delete your Personal Data—in certain situations
Restriction of use	The right to require us to restrict use of your Personal Data in certain circumstances, eg if you contest the accuracy of the data
Data portability	The right to receive the Personal Data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object to use	The right to object: —at any time to your Personal Data being used for direct marketing (including profiling) —in certain other situations to our continued use of your Personal Data, eg where we use your Personal Data for our legitimate interests unless there are compelling legitimate grounds for the processing to continue or the processing is required for the establishment, exercise or defence of legal claims
Not to be subject to decisions without human involvement	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you We do not make any such decisions based on data collected by our website
The right to withdraw consents	If you have provided us with a consent to use your Personal Data you have a right to withdraw

	that consent easily at any time. Withdrawing a consent will not affect the lawfulness of our use of your Personal Data in reliance on that consent before it was withdrawn
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For further information on each of those rights, including the circumstances in which they do and do not apply, please contact us (see ‘**How to contact us**’ below). You may also find it helpful to refer to the [guidance from the UK’s Information Commissioner](#) on your rights under the UK GDPR.

If you would like to exercise any of those rights, please email, call or write to us—see below: ‘**How to contact us**’. When contacting us please:

- provide enough information to identify yourself (e.g. your full name, address and patient or matter reference number and any additional identity information we may reasonably request from you, and
- let us know which right(s) you want to exercise and the information to which your request relates.

Keeping your Personal Data secure

We have appropriate security measures to prevent Personal Data from being accidentally lost, or used or accessed unlawfully. We limit access to your Personal Data to those who have a genuine business need to access it.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

If you want detailed information from Get Safe Online on how to protect your Personal Data and other information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

How to complain

Please contact us if you have any queries or concerns about our use of your Personal Data (see below ‘**How to contact us**’). We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with the Information Commissioner in the UK

The UK’s Information Commissioner may be contacted using the details at <https://ico.org.uk/make-a-complaint> or by telephone: 0303 123 1113.

Changes to this privacy policy

We may change this privacy policy from time to time—when we make significant changes we will take steps to inform you, for example by including a prominent link to a description of those changes on our website for a reasonable period or by updating you via email.

How to contact us

Individuals in the UK

You can contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint.

Our contact details are shown below:

[Insert contact address]

[Insert contact email address]

[Insert contact telephone number]