

# PRIVACY POLICY

## Introduction

Your privacy is very important to Us. We aim to collect and process your personal information in accordance with the GDPR and the UK's Data Protection Act of 2018.

This document details what information We collect from you as well as what We do and don't do with the personal information that We collect.

We may update this privacy policy at any time by posting a new version on this website. This document was last updated on 8 May 2019.

## Interpretation

In this Privacy Policy, the following words have the following meanings:

“Contact information” refers to personal information including but not restricted; to your name, address, phone number, Skype name and email address that is provided to Us for the purposes of interacting with us through the Website.;

“Content” means all text (including all blog posts), educational material, graphics, images, video, sound and other data displayed on, or available from, the Website;

“Health information” means personal information collected or generated by Us during the course of providing purchased physiotherapy services to you or during free clarity calls or emails regarding your physical condition;

“Personal information” means any information that identifies you or could be used to identify you. This includes contact information and health information;

“You” refers to the client seeking our Physiotherapy Services via the Website. Where a client is under the age of 18, requiring us to source information from a responsible adult, references to “you” in this Privacy Policy will include references to both the client and the responsible adult.

## Information and queries about our Privacy Policy

If you have any questions about this Privacy Policy please **Contact us**.

Any complaints about the way we handle your personal information can be addressed by contacting us directly or via the **Information Commissioner in the UK**.

## Sourcing health information

We aim to collect health information exclusively from prospective clients who want to make use of our paid physiotherapy services (online or in-person).

If the client is under 18 years of age, we will require a parent or legal guardian to provide health information, personal information and make payments on behalf of the client.

## When will we require you to provide personal information?

The types of personal information that we collect varies according to how you utilise our website.

### a. Contact information

We use “Google Analytics” and “Google Tag Manager” to help us understand how people use our website. Google Analytics and Google Tag Manager use cookies, which are text files placed on your computer when you browse our site.

We collect information such as your IP address, what browser you are using and your general location. This is for website security as well as market research intended solely for our own business use.

Please see our [Cookies Policy](#) for a further details about how cookies are used.

The social and professional networking share buttons on our Website e.g. share with Twitter, Facebook or Linked In, also use cookies. These cookies are usually set when you are logged into the relevant account. If you would like to opt of these please refer to our [Cookie Policy](#).

We require a name and email address when you would like to submit a question to us, subscribe to our newsletter/blog posts or to contact us via our [Contact Form](#).

We use MailChimp for all our email campaigns and it takes customer privacy very seriously. You can read more about their security [here](#).

Occasionally we promote our business and run competitions. Each competition that we run will have specific terms and conditions regarding what information is required from you.

If you purchase our physiotherapy services or any other products from this Website you will be asked to provide certain information to allow adequately access to and utilisation of the service being purchased. Depending on the services you may be required to your name, billing address, phone number, Skype name and email address. We also record your IP address.

When purchasing physiotherapy services or products from the Website, we may require you to provide sensitive and confidential payment information. All payments are processed by PayPal or Stripe and we do not ask for or store any account number or card details on our website.

We may use Skype for video consultations. All Skype-to-Skype voice calls, video calls, file transfers and instant messages are encrypted. You will have to provide some personal information to Skype when you register an account. Skype is a product of the Microsoft Company and you can read their [privacy policy here](#). Skype has certified its compliance with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield.

We may use Zoom for video consultations. All Zoom-to-Zoom voice calls, video calls, file transfers and instant messages are encrypted. You will have to provide some personal information to Zoom when you register an account and you can read their [privacy policy here](#). Zoom participates in and has certified its compliance with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield. They are also **GDPR compliant**.

We may use WhatsApp for video consultations. All WhatsApp voice calls, video calls, file transfers and instant messages are encrypted. You will have to provide some personal information to WhatsApp when you register an account and you can read their privacy policy [here](#). They are also **GDPR compliant**.

Other Activities: We may use information for purposes not listed above in the following circumstances: (a) where specifically authorised by you; (b) where the use is related to one of the primary purposes listed above and where it could reasonably be expected; (c) where it is necessary for Us to comply with the law or the lawful direction of a governmental authority or court; or (d) where it is in the interests of public health and safety as set out in the UK's Data Protection Act 2018.

## **b. Health Information**

We will be required to collect health information from you or generate health information about you, if We provide physiotherapy services to you in the form of a physiotherapy consultation and a customised treatment programme or in the form of quick clarity calls and emails.

Your health information will be collected in various ways. These include online questionnaires, voice or video calls, emails or instant messages via encrypted messaging services. This is designed to obtain a detailed medical history and any other important information required to make a thorough clinical diagnosis and recommend an effective treatment plan. Such information may take the form of:

- personal details such as your name, age, and gender;
- information about your current health service providers, including general medical practitioner;
- information about current or past symptoms, injuries, diseases conditions or disabilities;
- information about past operations, treatments received, and treatment programmes undertaken;
- information about allergies;
- information about medications which you are taking or have taken;
- information about your family medical history where relevant to your own condition;
- information about accidents, incidents or circumstances which caused or may have caused injury or discomfort;
- information about medical investigations e.g. x-rays, MRI, ultrasound, blood tests etc.
- our opinion of your medical condition;
- our recommended treatment plan.

You may also choose to submit a video for the purposes of motion analysis e.g. of you running on a treadmill. Videos can be emailed or if they contain large files transferred via WeTransfer. WeTransfer stores you files for 7 days after which it is automatically deleted from their servers. Your files will be stored on servers in the EU if you upload them from an IP address in the EU. During an upload, while it's stored on our servers, and during a download, transfers are encrypted and send over a secured connection (https) only. The servers they use to store your transfers for you are GDPR compliant.

You can find WeTransfer's Privacy Policy [here](#).

We store all our files containing your personal and health information in WriteUpp. WriteUpp is a practice management and processing system which stores all files in encrypted folders.

A Two Factor Authentication system is used to access files. These files are stored on secured servers located in the EU. If you would like to know more about how WriteUpp protects your privacy please follow **this link**.

### **How we DO NOT use your personal information**

Except as set out in the next two clauses below, we will not disclose your personal information to other persons or entities. In particular:

- We will not give, lend, rent or sell your personal information to third party telemarketing, market research organisation or email list building organisation that might on-sell it to other people or organisations.
- We will not use or disclose your health information except in accordance with your directions, or as necessary to deliver our health services to you.

### **How we will use your personal information**

#### **a. Contact Information**

We may use your contact information for the following purposes:

- We use your IP address and demographic information, that We collect with the help of cookies, to generate a holistic but anonymous picture of our user base and usage patterns. This information allows us to analyse trends to improve the content and services that we provide.
- We will use your contact information to respond to any query or request that you have contacted Us with;
- If you subscribe to receive our newsletter or new blog post alerts or a feed via a social networking service, We will use your contact information to send that information to you. The information may contain direct marketing material which contains special promotions and special offers;
- We have the right to display any comment you submit on the Website (blog comments and testimonials), along with your name. We will not publish your email address;
- If you register to use our Physiotherapy Services, we will use your contact information to deliver those services to you;
- If you win a prize in one of our competitions, We will use your contact information to notify you, and will publish your name as the winner if required to do so by law.

#### **b. Health information**

We may use or disclose your health information for the following purposes:

- We will use your health information to enable Us to answer “clarity calls” and email questions and to diagnose your condition, recommend a treatment plan and/or to provide you with further information about other treatment options;
- We will use your health information anonymously to allow Us to manage our business, for example through planning, or evaluating and assessing the cost-effectiveness of a particular treatment or service;

- We will use your health information anonymously to perform clinical audit activities, where We evaluate and seek to improve the delivery of a particular treatment or service;
- We will use your health information to comply with accreditation activities, and the requirements of professional and industry bodies e.g. the Chartered Society of Physiotherapy and the UK's Health and Care Professions Council;
- We will use your health information to respond to complaints made by you;
- We will use your health information to co-operate with Our liability insurers (e.g. by disclosing details to a medical expert, insurer, defence organisation or legal advisor) in the event that We become aware of a potential or actual claim against Us by you;
- We will use your health information to obtain advice and legal services in relation to the defence of potential or actual legal proceedings.

### **c. Personal information**

We may use personal information (both contact information and health information) for the following purposes:

- We will use financial data to process payments, and co-ordinate refunds.
- Online businesses are occasionally exposed to fraudulent activities by users. We have the right to use the personal information that We collect to verify your identity. Usually these checks will only be carried out should there be reason to suspect fraud;
- We may use your personal information to recover debts owed to Us;
- If We are involved in a reorganisation, merger, acquisition or sale of our assets, your information may be transferred as part of that agreement. We will notify you (for example, via email) of any such transaction and your choices regarding this will be outlined for you.
- We may also disclose your personal information where required or necessary under the provisions of the Data Protection Act 2018 (e.g. where disclosure is required by law or is necessary for legal proceedings).

## **Disclosing personal information**

### **a. Parties to whom we could disclose your information**

During the course of our business, we may disclose your personal information as follows:

- Third party companies and individuals (Including but not limited to Google, Paypal, Stripe, WriteUpp, MailChimp) are engaged to perform specific business services for us. These services include the processing of payments, trend analysis, marketing and promotions. We may need to provide some of your details to these services providers (or require you to provide your details directly to them) in order for them to perform their functions. We will only do so where it is strictly necessary for them to perform these functions;
- We will pass on information relating to suspected fraudulent activity to appropriate authorities including the police, financial institutions, or otherwise if required to do so by law;
- If you win a prize in one of our competitions, we will disclose some of your contact information in certain publications in order to comply with our obligations under applicable trade lotteries legislation. Precise details of the disclosures to be made appear in the terms and conditions of each competition and entry into each of our competitions requires your consent to such disclosures.

## **b. Cross-border disclosures**

The disclosures of information listed in section (a) above, may involve transmitting, storing or processing information across national borders. This includes (amongst other things): our right to host the website on servers located outside the United Kingdom; our right to conduct usage analysis; and our right to process payments. You consent to the transmission of data for these purposes in accordance with the Data Protection Act 2018.

We host our Website with Wix.com.

Wix is GDPR compliant and you can find their **privacy policy here**. Wix also holds a current EU-U.S. Privacy Shield and Swiss-U.S. Privacy Shield certification.

Please note that personal information that you share with us in the form of, or relating to, comments or testimonials will be published on our Website and this information will be accessible in any worldwide location where there is internet access.

## **Your rights in relation to personal information that you provide**

Subject to the exceptions allowed by law, you have a right to:

- view,
- change and
- remove the personal information that we store about you.

**Email us** should you like to request to view, change or remove your personal information from Our database. You should provide us with any details necessary to enable us to comply with your request, including your name and the capacity in which you believe we are storing your personal information (i.e. as a customer, newsletter subscriber, patient etc). We shall also request information to verify your identity.

We have the right to request a small fee (to cover our costs if any) before We can assist you with your request. However, but in most cases we will provide your information free of charge. We will inform you of any costs likely to be involved and will aim to respond to your request within 10 business days.

Please note that due to legal reasons we may not always be able to destroy or remove your health information.

- Clinical notes for children need to be maintained until their 25th birthday or 26th if they were 17 or older when they were last seen, or eight years after death (whichever is longer).
- Adult clinical records have to be stored for a minimum of eight years after the date of their last treatment.
- Clinic diaries should be kept for a minimum of two years.

## Changing your communication preferences

If you have previously subscribed to our newsletter or new blog post alerts but would like to unsubscribe, please:

- click on the “unsubscribe” link in any one of Our communications; or
- reply to any of our email messages using the word “unsubscribe” in the heading; or
- **Contact Us** directly to let us know your preferences.

There is no charge associated with this removal.

## Information security

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information, and to prevent unauthorised access, modification or disclosure of your personal information.

When purchasing our products or services via our website payment information is processed via payment processing companies (We use Paypal or Stripe). These companies take privacy very seriously and use secure servers to perform their functions. Payment processing is not carried out on Our Website.

## Other privacy information

You are responsible for the security of and access to your computer. There are particular risks when you use your computer for online shopping in a public place.

This document was compiled using the Privacy Notices Code of Practice document provided by the UK Information Commissioner’s Office (ICO).

Further Privacy information can be obtained on the website of the **UK Information Commissioner’s Office**.