

# Privacy Policy

Last updated: 17 February 2026 This Privacy Policy explains how HJ Physiotherapy ("we", "us", "our") collects, uses, stores and shares personal data when you use our website [\\*\\*https://hjphysiotherapy.co.uk\\*\\*](https://hjphysiotherapy.co.uk) (the "Website"), contact us, or receive our services.

We are committed to protecting your privacy and handling your personal data in line with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

## 1) Who we are (Data Controller)

Data Controller: HJ Physiotherapy Malvern Limited Location: Malvern, UK (and mobile services across Worcestershire & Herefordshire) Email: [enquiries@hjphysiotherapy.co.uk](mailto:enquiries@hjphysiotherapy.co.uk)

If you have questions about this policy or your data, please contact us using the details above.

## 2) The personal data we collect

Depending on how you interact with us, we may collect:

### A) Information you provide to us

- Contact details: name, email address, phone number, address (if needed for home visits)
- Appointment and enquiry details: preferred appointment times, triage/booking responses, and notes you choose to share
- Messages you send us: information you share by email, SMS/text message, WhatsApp Business, phone, or website forms (which may include injury/symptom details)
- Payment and billing details: payment status, invoices/receipts (we do not intentionally collect full card details via the Website unless a payment provider form requires it)
- Insurance details (where applicable): insurer name, policy/claim details required for billing/authorisation

### B) Health and care data (special category data)

When you become a patient/client — and in some cases when you submit a triage/booking request or enquiry — we may process health information such as:

- brief descriptions of symptoms/injury and relevant history you submit via our online triage/booking form
- injury/symptom details you share with us via email, SMS/text message, or WhatsApp Business
- symptoms, medical history, injury details, assessment findings
- treatment plans, progress notes, outcome measures
- exercise programmes and adherence notes (e.g., via Physitrack where used)

### C) Information collected automatically when you use the Website

- Device and usage data: IP address, browser type, pages viewed, time spent, referring pages
- Cookie data: see Section 9 (Cookies)

## 3) How we use your personal data

We use personal data to:

- respond to enquiries and triage requests (including free triage calls where offered)
- review enquiry/triage information to determine suitability, urgency, and the most appropriate appointment type
- book, manage and deliver appointments (clinic, mobile/home visit, or remote where applicable)
- provide physiotherapy, sports massage and acupuncture services safely and effectively
- manage payments, invoices, insurance claims and accounting
- send administrative messages (appointment confirmations, rescheduling, cancellations)
- request feedback and improve our services
- maintain the security and performance of our Website
- comply with legal and regulatory obligations

## 4) Our lawful bases for processing (UK GDPR)

We will only process your personal data when we have a lawful basis.

### A) For general personal data

- Contract (Article 6(1)(b)) – to provide services you request (e.g., booking and delivering appointments)
- Legitimate interests (Article 6(1)(f)) – to run our business, respond to enquiries, maintain records, improve services, and keep our Website secure (balanced against your rights)
- Legal obligation (Article 6(1)(c)) – to meet legal duties (e.g., tax/accounting requirements)
- Consent (Article 6(1)(a)) – where we ask for it (e.g., certain marketing communications or non-essential cookies)

### B) For health data (special category data)

Health data is “special category” data under UK GDPR. We process it only when a special category condition applies, typically:

- Health or social care (Article 9(2)(h)) – for the purposes of preventive or occupational medicine, medical diagnosis, and the provision of health or social care or treatment, under professional confidentiality
- Explicit consent (Article 9(2)(a)) – where required or where we choose to rely on consent in a specific context
- Establishment, exercise or defence of legal claims (Article 9(2)(f)) – if needed

We also comply with the common law duty of confidentiality and professional standards.

## 5) Where we get your data from

- directly from you (website forms, email, SMS/text message, WhatsApp Business, phone, in-person)
- from insurers or other healthcare professionals where relevant and authorised
- from your use of the Website (cookies/analytics)

## 6) Who we share your data with

We do not sell your personal data.

We may share data where necessary with:

- our clinicians and administrative staff (only as needed)
- service providers who support our operations (acting as processors), such as:

- GoDaddy (website hosting and related website services)
- GoDaddy online triage/booking system (to capture and manage triage/booking requests, which may include health information you submit)
- IT support providers
- email/communications tools
- Physitrack (where used for exercise prescription and/or remote sessions)
- iZettle (Zettle by PayPal) (payment processing)
- telecommunications/messaging providers (for delivery of emails, SMS/text messages, and WhatsApp Business messages, which is provided by Meta)
- insurers (where you use insurance to fund treatment)
- professional advisers (accountants, insurers, legal advisers)
- regulators or authorities where required by law

We require processors to protect your data and only use it for the services they provide to us.

## 7) International transfers

Some of our service providers may store or process data outside the UK. Where this happens, we will ensure appropriate safeguards are in place (for example, UK adequacy regulations or approved contractual safeguards).

## 8) How long we keep your data (retention)

We keep personal data only as long as necessary for the purposes described in this policy, including legal, accounting and clinical requirements.

Typical retention periods include:

- Triage/booking requests and enquiries: usually up to 12 months after last contact (unless you become a patient, or we need longer for legal reasons)
- Clinical records: retained in line with applicable healthcare record retention guidance and professional/insurance requirements
- Financial records (invoices/receipts): typically 6 years for UK tax/accounting purposes

If you would like more detail on retention for a specific record type, contact us.

## 9) Cookies and analytics

We use cookies and similar technologies to:

- make the Website work properly
- understand how visitors use the Website
- improve performance and content

Some cookies are strictly necessary. Others (such as analytics cookies) are optional and should be used only with your consent.

### GoDaddy website cookies

Our Website is hosted and managed via GoDaddy, and GoDaddy may place cookies or similar technologies that support core website functionality, security, and performance.

Cookie controls and categories may be provided through GoDaddy's website tools (where enabled). You can also control cookies through your browser settings.

### Google Analytics

We may use Google Analytics to measure Website traffic and usage. Google Analytics may collect information such as your IP address and device identifiers. We configure analytics where possible to reduce data collection (for example, IP anonymisation/other privacy controls where available).

You can control cookies through:

- our cookie banner/consent tool (where implemented)
- your browser settings

## 10) Marketing communications

We may send you marketing communications (e.g., service updates, offers) only where permitted by law.

- If you have opted in, you can unsubscribe at any time using the link in the message (where provided) or by contacting us.
- We do not use your clinical information for marketing.

## 11) Your data protection rights

Under UK GDPR, you may have the right to:

- access your personal data
- rectify inaccurate or incomplete data
- erase your data (in some circumstances)
- restrict processing (in some circumstances)
- object to processing based on legitimate interests
- data portability (in some circumstances)
- withdraw consent at any time (where we rely on consent)

To exercise your rights, contact us using the details in Section 1.

## 12) Complaints

If you have concerns, please contact us first so we can try to resolve the issue.

You also have the right to complain to the Information Commissioner's Office (ICO) (UK data protection regulator):<https://ico.org.uk/make-a-complaint/>

## 13) Security

We use appropriate technical and organisational measures to protect personal data against loss, misuse, unauthorised access, disclosure, alteration or destruction. However, no website or email transmission is completely secure.

## 14) Links to other websites

Our Website may contain links to third-party websites (e.g., social media). We are not responsible for the privacy practices of those websites. Please review their privacy policies.

## 15) Changes to this policy

We may update this Privacy Policy from time to time. The latest version will always be posted on this page, with the "Last updated" date shown at the top.

## 16) Important note (not medical advice)

Information on this Website is for general information only and is not a substitute for professional medical advice, diagnosis or treatment. If you are concerned about your health, contact an appropriate healthcare professional.