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## Privacy Policy

This is the privacy policy for Sarah Howard, trading as Therapeutic Aromas

And as the following website(s) and social media identities:

<https://therapeuticaromas.co.uk/>

<https://www.facebook.com/TherapeuticAromasTonbridge>

<https://twitter.com/therapeuticft>

<https://www.instagram.com/therapeuticaromas/>

<https://therapeuticaromas.simplybook.it/v2/>

### **Contact details:**

Sarah Howard  
Therapeutic Aromas  
C/O Head to Toe Health  
34 Avebury Avenue, Tonbridge, Kent. TN9 1TL  
[mail@therapeuticaromas.co.uk](mailto:mail@therapeuticaromas.co.uk)

There are two sections to the following information:

1. About your personal data – the type of data that is collected or used, including when, how and why
2. Your rights – all the ways that you can control what happens with your data

### **About your personal data:**

#### **When you make an enquiry or Book an Appointment**

The name and contact details you give, and the content of your message(s) are retained for the following reasons:

To enable me to contact you using the contact preferences you give me in relation to:

- Appointment times
- Information relating to treatments or information related to your health
- Special offers and promotions in the form of a newsletter (***you may unsubscribe from this at any time***)

#### **When you work with me 1:1 (Massage, Reflexology & EFT)**

In order to give professional treatments, I will need to ask for and keep information about your health. I will only use this for informing treatments and any advice I give as a result of your treatment. The information to be held is:

- Your contact details
- Medical history and other health-related information (which I will take from you at first consultation).
- Treatment details and related notes (which I will take after each consultation) In both cases I am required by law to retain these records for seven years after the completion of our contract – or in the case of a minor, from seven years beyond the date of their eighteenth birthday.

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## **When I Make Products for you:**

I keep a record of products I make for clients, this includes:-

- Contact details and basic health information relevant to the product(s)
- Date product(s) made
- Details of the product(s) made, recipe, size and price

## **Other data sources:**

Incoming data is also received from my website host Godaddy, MailChimp, my on-line booking site - SimplyBookMe, Skype and/or Zoom

I may receive information from another practitioner or therapist as part of a referral. In such a case you may be unaware that the consented data transfer has taken place, I will therefore inform you of receipt within 28 days

## **Sharing your data**

Your privacy is important, and I do not sell your data nor share it except by your consent or under the law.

When working together, I may give out elements of your personal information to another practitioner or therapist as part of a referral. This will always only be with your personal consent.

In continuation of current UK law on confidentiality I also retain the right and, in some cases, the legal requirement to breach confidentiality to inform an authority such as the police or your GP of impending harm or illegality.

## **Your Rights**

The GDPR sets out clearly what your rights are. It also lays out deadlines for a reply and other rules which are reproduced for your information at the bottom of this section.

### **Right to be informed**

You have the right to be informed about the collection and use of your personal data. This is a key transparency requirement under the GDPR.

I must provide you with information including: my purposes for processing your personal data, my retention periods for that personal data, and who it will be shared with. This 'privacy information' is provided above.

I must provide you with privacy information at the time I collect your personal data from you, in other words it has to be available to you before you fill in a form or hand over your data such as your email address.

If I obtain your personal data from other sources, e.g. by referral or from the payment service provider your selected, I must provide you with privacy information within a reasonable period of obtaining the data and no later than one month.

There are a few circumstances when I do not need to provide people with privacy information, such as if an individual already has the information or if it would involve a disproportionate effort to provide it.

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The information I provide to people must be concise, transparent, intelligible, easily accessible, and it must use clear and plain language. Therefore, if there is anything you do not understand, please get in touch.

### **Right of access**

You have the right to access your personal data and supplementary information. This allows you to be aware of and verify the lawfulness of the processing.

You are entitled to confirmation that your data is being processed, access to your personal data, and other supplementary information as provided in this privacy notice

### **Right to rectification**

You have the right to have the data your personal data corrected if it is incorrect or completed if it is incomplete.

### **Right to erasure**

You may request, verbally or in writing, to have your data erased. This is also commonly known as 'the right to be forgotten'. This right only takes effect when:

- Your personal data is no longer necessary for the purpose for which it was originally collected or processed,
- you withdraw your consent when the sole legal basis to hold this information is your consent,
- There is a legitimate interest in processing this data, which does not override your request
- processing/analysing of the personal data was for direct marketing purposes and this is the use you object to
- your personal data was processed unlawfully without a proper legal basis
- There is a legal obligation to comply with your request; or
- If the personal data was processed to offer information society services to a child.

### **Right to restrict processing**

You have the right to request the restriction or suppression of your personal data. In other words you want to stop the data being used but keep it on file.

In this case your personal data cannot be used and can only be stored unless:

- you give your consent;
- it is for the establishment, exercise or defence of legal claims;
- it is for the protection of the rights of another person (natural or legal); or
- it is for reasons of important public interest.

### **Right to data portability**

This allows you to obtain and reuse your personal data for your own purposes across different services. It allows you to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without affecting its usability. Doing this is meant to enable you to take advantage of applications and services that can use this data to find you a better deal or help you understand your spending habits. In general, this rule exists for data held by big service providers, such as your call history or insurance or gas bill history. The right also only applies to information you have provided.

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## Right to object

Individuals have the right to object to:

- processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
- direct marketing (including profiling); and
- processing for purposes of scientific/historical research and statistics.

Your objection must be made on grounds relating to your particular situation.

Once you object your data can no longer be processed, unless:-

- there are demonstrably compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the individual; or
- the processing is for the establishment, exercise or defence of legal claims.

Full details of your rights can be found at <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>.

You may complain directly to me using the contact details above. If you find the outcome unsatisfactory you are then able to object or complain to:

If you are dissatisfied with the response you can complain to the Information Commissioner's Office; their contact details are at: [www.ico.org.uk](http://www.ico.org.uk)

You may of course also exercise your right to legal action.

### Timelines:

You can claim a right verbally or in writing.

A response should come without delay and at least within one month of receipt. The time limit is calculated from the day after you make the request (whether the day after is a working day or not) until the corresponding calendar date in the next month.

I aim to respond within 28 days.

### Exceptions:

When you request access to your data, a copy must be provided free of charge. However, you can be charged a 'reasonable fee' when a request is:

- manifestly unfounded or excessive, particularly if it is repetitive, unless that's because I failed to respond; or
- for further copies of the same information (that's previously been provided).