



Website Privacy Policy

Introduction

Welcome to the privacy policy for Dr Emma Rowley Ltd.

Dr Emma Rowley Ltd. takes the privacy rights of all its clients seriously and adopts a high standard of compliance and confidentiality when dealing with your data. Dr Emma Rowley Ltd. wants you to understand that this is a safe place for you to discuss your feelings and concerns and Dr Emma Rowley Ltd. operates in a highly confidential environment. This privacy policy sets out the details of how data is collected and processed through the use of our website.

1. Important Information and who we are

Purpose of this Privacy Policy

This privacy policy aims to give you information on how Dr Emma Rowley Ltd. collects and processes your personal data through your use of this website and the use of our services and treatments. This website is not intended for children and we do not knowingly collect data relating to children via our website. It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal or sensitive data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Controller

Dr Emma Rowley of Dr Emma Rowley Ltd. is the data controller and is responsible for your personal data (referred to as “we”, “us” or “our” in this privacy notice). We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our DPO in the following ways:

Full name of legal entity: Dr Emma Rowley trading as Dr Emma Rowley Ltd.

Email address: emma@dremmarowley.com

Postal address: Dr Emma Rowley Ltd, Reigate Natural Health, Suite 1, Alma House, Alma Road, Reigate, RH2 0AX.

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). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated in April 2023.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

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. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes first name, last name, username or similar identifier, marital status, title, date of birth and gender.
- 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 us.
- Technical Data includes internet protocol (IP) address, your login data, 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.
- Usage Data includes information about how you use our website, products and services.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

- Sensitive Data includes information about your health, including information about your existing and previous medical conditions, medication details, psychiatric history and any other relevant health information to enable us to carry out our services to you.

We require your explicit consent for processing sensitive data, so when you submit your details, we will ask you to confirm your consent to this processing via the consent tick boxes on our registration forms.

Generally, we do not collect any other Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership and genetic and biometric data). Nor do we collect any information about criminal convictions and offences. However, it may be necessary to collect certain additional types of special category data about you during our assessment and/or therapy sessions. If so, we will ask you to confirm your consent to this processing via a consent tick box (either on our registration form or sent via email).

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services or goods). In this case, we may have to cancel a service or product you have with us but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms before or during an appointment, verbally during discussions at our practice, or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our services or any of our products;
 - subscribe to our service or publications; or
 - give us feedback or contact us.
- Automated technologies or interactions. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.
- Third parties or publicly available sources. We will receive personal data about you from various third parties and public sources as set out below:

Technical Data from the following party:

(a) analytics providers such as Wix.

- Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent when collecting sensitive data (such as health information) via email or text message.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose / Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To provide our services and to process and deliver any orders including: (a) Provide our services to you (b) Manage payments, fees and charges (c) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Sensitive Data	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) (c) Explicit consent (in the case of Sensitive Data).
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Usage (d) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services,	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our

marketing, customer relationships and experiences		products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
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Marketing

We do not use your personal data to send you marketing information. We also do not share any of your personal data with any third parties for marketing purposes.