

Our Privacy Policy

The General Data Protection Regulation (*GDPR*) is concerned with the personal information about you that I collect, store and share.

INTRODUCTION

Holistic Hugs is a subsidiary of Sunshine And Laughter (“we”, “our” or “us”) based in Huddersfield, West Yorkshire, UK.

We are committed to ensuring that when we collect and use information provided to us or information about visitors to our websites (as described below), we do so in accordance with applicable data privacy laws and are registered to the ICO.

This Privacy Policy explains how we may use information that we obtain about you.

For further information, please contact holistichugs0@gmail.com

This page details my GDPR policy.

SCOPE OF PRIVACY POLICY

This Privacy Policy applies to your use of any of our services, including when you request information from us or engage our services or to any information collected from third parties.

This Privacy Policy also applies to all our websites and online services, including the following:

www.holistichugs.co.uk

www.sunshineandlaughter.co

and any other website, mobile app or other online service created or hosted by us from time to time on which this privacy policy appears, together, our “online services”.

We may need to collect certain details from you through our online services if, for example, you want to enquire about our services. In addition, our online services (website) make use of cookies and similar technologies but will not store, save or collect personal information.

PERSONAL INFORMATION I MAY COLLECT.

- Name.
- Gender (or preferred identity).
- Age.
- Address.
- Telephone/SMS number (plus permission to send SMS & leave voice message).
- Email address.
- Details of medical conditions that might affect the session.
- Valid ID (copy of driving licence or passport)

HOW I WILL STORE YOUR PERSONAL INFORMATION. STORAGE METHODS.

•**Paper:** Written notes – hard copies of booking form and ID. Personal ID collected as part of the service to ensure the safety of the service provider (myself) will be collected by use of a safe emailing host which encrypts the information. A hard copy will also be stored in a locked cabinet.

- Smartphone:** I will store your contact information in my contacts. This allows me to contact you in case of emergencies.
- Email/SMS:** Your email address and correspondence will be stored in my email account (currently Gmail) by nature of you contacting me. Your telephone number may be stored in my SMS should we exchange messages this way. Electronic correspondence will also be held by the corresponding app (Gmail, Phone's SMS).
- Website:** None of your personal information is stored on my website, other than to momentarily collect & send it to my Gmail account for the purposes of our initial contact.

DOCUMENTS HELD. PAPER...

- Booking Form
- Contract/Agreement
- Any additional information regarding health issues that may affect the session
- Personal ID (copy of driving licence or passport)
- GDPR Agreement

ELECTRONIC...

- Contact name & telephone
- Email/SMS
- Booking Form

HOW I MAY PROCESS/SHARE YOUR PERSONAL INFORMATION. CONSULTATION.

We use your information only where it is necessary for the performance of a contract with you or necessary in connection with a legal obligation and necessary to fulfil our legitimate interests. In particular we use your information in order to provide you with, and improve, our services, for example:

- To carry out our obligations arising from any contracts entered into between you and us.
- To facilitate our internal business operations, including to fulfil our legal requirements and professional obligations.
- To maintain and develop our relationship with you.
- To provide you on an ongoing basis with information and services that you request from us or which we feel may interest you as permitted under applicable law.
- To ensure that content from our online services is presented in the most effective and secure manner for you and for your device and settings.
- For research, planning, service development, security or risk management.
- To maintain and update our records.

We may not be able to do these things without your personal information.

Under applicable data protection legislation, we have a duty of care to ensure that your personal information is accurate and up to date. Therefore, please advise us of any changes to your information.

DISCLOSURE OF YOUR INFORMATION

We may exchange your personal information with third parties where:

- You have consented to us sharing your personal information in this way;

- b. We are under a legal, regulatory or professional obligation to do so (for example, in order to comply with anti-money laundering requirements) or in order to enforce or apply our terms of business or to protect the rights and interests, property, or safety of our firm, our clients or others;
- c. All, or substantially all our assets, or the assets of an associated firm, are merged with or acquired by a third party, or we expand or re-organise our business, in which case your personal information may form part of the transferred or merged assets or we may need to transfer your information to new entities or third parties through which our business will be carried out;
- d. We use a third-party service provider to provide services that involve data processing, for example archival, auditing, professional advisory (including legal, accounting, compliance, financial and business consulting), mailing house, delivery, technology, website, research, banking, payment, client contact, data processing, insurance, litigation support, marketing and security services.

EMERGENCIES.

If your health is in jeopardy (provided I have your consent) I may share your contact information with an emergency healthcare service (e.g. Ambulance Service).

SECURITY

The transmission of information via the internet is not completely secure. We cannot guarantee the security of your data transmitted to our online services; any transmission is at your own risk. Once we have received your information, we will take reasonable steps to use procedures and security features to try to prevent unauthorised access, modification or disclosure. For example, if you communicate with us using email, you assume the risks that such communications between us are intercepted, not received, delayed, corrupted or are received by persons other than the intended recipient.

ERASING YOUR INFORMATION.

When we have finished working together, I will erase electronic copies of your information & correspondence within one month.

I will hold onto your written information for up to seven years past the end of our working together. This is so that I have a reference of our work in situations such as you returning to Cuddle Therapy in the future. After this time has passed, I will shred the written information.

YOUR RIGHTS.

You have the following rights...

- To be informed what information I hold (i.e. this document).
- To see the information I hold about you (free of charge for the initial request).
- To rectify any inaccurate or incomplete personal information.
- To withdraw consent to me using your personal information.
- To request your personal information be erased (*though I can decline whilst the information is needed for me to practice lawfully & competently*).

If you would like to request a copy of your data or would like to change or erase all or any part of the information we hold about you, please contact us as set out below. We may refuse to provide access and may refuse to delete data if we have a legal obligation not to do so in which case we will provide reasons for our decision as required by law. We have 1 month to comply to your request.

THE KIND OF INFORMATION WE HOLD ABOUT INDIVIDUALS OTHER THAN CLIENTS AND HOW THIS DATA IS USED

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). During the course of our day to day basis we acquire information regarding

individuals other than our Clients and we will retain this data where we have a legitimate business reason to do so.

Typically, we acquire personal data on individuals other than our clients in the following circumstances:

- a. Where we have met individuals at networking or other marketing events;
- b. Where individuals have made enquiries with us regarding possible services but have not subsequently become clients of the business;
- c. Where we have dealt with individuals in the capacity as suppliers of services to the Company;
- d. Where we have regular business related dealings with you.

In many circumstances the extent of the data we hold is limited and may be publicly available by way of other websites but usually the information we will retain is limited to: Contact information including but not limited to email addresses, contact telephone numbers, business addresses and in some cases personal addresses.

We have a legitimate business interest in retaining this data on the basis that we must retain some personal data on third parties and suppliers in the ordinary course of business. We may also use this data to send information to you in respect of events or other updates relating to us. We have a legitimate interest in retaining your data for this purpose however you have the right to ask us to erase or rectify your data and the right to opt out of receiving marketing information.

STATUS OF THIS POLICY

Your provision of personal information to us constitutes your acceptance of the terms of this Privacy Policy.

Technologies and information governance practices are constantly developing. We may therefore need to revise this Privacy Policy in future. You should therefore review this page regularly to ensure that you are aware of any changes to its terms.

CONTACT AND FURTHER INFORMATION

If you have any questions about this Privacy Policy, or want to submit a written complaint about how we handle your personal information, please contact us at holistichugs0@gmail.com

If you make a privacy complaint, we will respond to let you know how your complaint will be handled. We may ask you for further details, consult with other parties and keep records regarding your complaint.

NB: A printed copy of this statement will be given to you when we first meet. If we agree to continue working together, we will both sign the printed copy.