

M.Rituals & Aesthetics is committed to ensuring the privacy of our clients and website visitors. This policy explains what personal data we may collect about you when you interact with us and how we use it.

OUR PROMISE

- Service: We will only use your data to improve your experience of our services.
- <u>Patient Safety:</u> We will only use your sensitive personal data to ensure your care and safety.
- Keep in touch: We will only contact you about things you have shown an interest in.

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WHO ARE WE?

"We", "our" and "us" means 'M.Rituals & Aesthetics'.

'M.Rituals & Aesthetics' is the data controller in relation to any of your personal data obtained whilst using the services of 'M.Rituals & Aesthetics'.

You can contact us at <u>m.rituals_aesthetics@icloud.com</u> or write to us at 9 Charing Cross, Norwich, Norfolk, NR2 4AX.



YOUR PERSONAL AND SENSITIVE DATA

Under data protection legislation, the data we hold about you can be categorised as follows:

<u>Personal data:</u> This is data related to an identified or identifiable person. Examples of personal data we collect and process include names, email addresses, location, telephone numbers, ID numbers and online identifiers. Where this policy states "your data/your personal data" we are referring to Personal Data unless otherwise stated.

<u>Sensitive personal data:</u> Sometimes referred to as "Special Category Data", this is data that is deemed to be more sensitive than the above personal data. For example, medical records, genetics, biometric data, details of ethnicity, sexual orientation or other health data. We only use this data for the purposes of your treatment and to ensure you care and safety as a patient. We never use your sensitive personal data for marketing purposes.

WHAT PERSONAL DATA DO WE COLLECT?

- Details gathered as part of the provision of healthcare or other goods or services to you.
- Whilst using our website you may submit information to us via an enquiry form. This
 may include your name, email address, phone number and postcode. We require this
 information to contact you regarding your enquiry and to better understand demand
 for our services.
- Details of your interactions with us in clinic, or online.
- Details of services and/or treatment you have received from us.
- Copies of documents you provide in relation to your health.
- Payment details.
- Details of your visits to our websites, including how you arrived, which pages you
 visited, time spent, links clicked and technical information about your device and
 internet connection.
- Personal details which help us make suggestions. For example, you may indicate that
 you have a particular skin condition or concern, which we will use to recommend
 treatments.
- Information gathered by the use of cookies via our website.
- Your reviews, survey responses and comments.



- The name and contact details (including phone number) of your next of kin.
- Client feedback and treatment outcome information you provide.
- Information about complaints and incidents.
- Other information received from other sources, including from your use of websites
 and other digital platforms we operate or the other services we provide, information
 from business partners, advertising networks, analytics providers, or information
 provided by other companies who have obtained your permission to share
 information about you.

Where you have named someone as your next of kin and provided us with personal data about that individual, it is your responsibility to ensure that that individual is aware of and accepts the terms of this privacy policy.

WHEN DO WE COLLECT YOUR PERSONAL DATA?

- When you visit any of our websites.
- When you communicate with us by phone or email or instant messaging systems.
- When you engage with us on social media.
- When you interact (open/click) with our emails.
- When you request further information from us.
- When you arrange appointments with us.
- When you attend appointments and as part of the consultation process and as part of the provision of goods and services to you.
- When you make payments to us or require a refund.
- When you fill in any forms online or in clinic.
- When you've given a third party permission to share with us the information they hold about you (eg. Facebook/Instagram).
- When you complete any surveys we send you.
- When you review our services.
- When you refer a friend.

HOW AND WHY DO WE USE YOUR PERSONAL DATA?

We want to give you the best possible experience from your very first interaction with us. One way to achieve this is to better understand who you are by collecting data about you.

We use this to provide goods and services to you and to make improvements to our



service and to communicate information that you are likely to be interested in. There are many cases where we are required to collect and process data about you either to fulfil our contractual obligations to you or to comply with the law.

We use your personal data for the following purposes:

- To provide healthcare or other goods or services to you.
- To contact you regarding your enquiry we have to collect and process your data in order to fulfil your request for further information or to book an appointment.
- To provide you with further information about the subject of your enquiry so you understand your options and can make an informed decision.
- To remind you by email to book subsequent appointments for a treatment you have previously had which requires ongoing review.
- To contact you regarding your appointments and treatments we want to make sure you don't miss your appointments.
- With your consent, we will send you special offers and news via email to keep you
 up to date with our promotions.
- To tailor the content of our communications to make it more relevant to.
- For business performance analysis to ensure we continue to provide the best service.
- To make sure we're speaking to the right person to help prevent and detect.
- To take payment and process refunds.
- To provide customer service and support.

THE LEGAL BASES WE RELY ON

Under data protection legislation, we must have one of a number of reasons for processing your personal data. Below we outline the bases we use and an example of the purpose for which it is used:

<u>Consent:</u> In some situations, we ask for your consent to process your data for the purpose we have identified.

 If we ask you to tick a box on our enquiry form to receive our special offer and discount

Generally, we will only ask for your consent in limited circumstances. In these circumstances, we will always aim to be clear and transparent about why we need your



consent and what we are asking it for. Where we are relying on consent to process personal data, you have the right to withdraw your consent at any time by contacting us using the details below and we will stop the processing for which consent was obtained.

Contractual Obligations: Sometimes we may need your data to fulfil our obligations.

 If you wish to book an appointment we may need your payment details, address and contact details to process payment and secure your booking.

<u>Legal Compliance:</u> There may be some situations where we are required by law or regulatory bodies to process your data. For example:

- We may require you provide proof of ID and age where the law requires.
- Gathering information as part of investigations by regulatory bodies or in connection with legal proceedings or requests.

<u>Legitimate Interests:</u> In some situations we require your data to pursue our interests in a way which might reasonably be expected as part of running our business and which does not significantly impact your rights or freedom. For example:

- We will use the contact details you provide, to call/SMS/email you regarding your enquiry and provide you with targeted relevant information.
- We may combine and anonymise your data with that of other customers to identify trends and help make improvements to our service and business.

To process sensitive personal data we rely on additional legal grounds and generally, they are as follows:

- Your consent.
- Where it is necessary to provide health or social care treatment, or to manage health or social care systems and services. This may also include monitoring whether the quality of our services or treatment is meeting expectations.
- It is necessary for a public interest purpose in line with any laws that are applicable.
 This should assist in protecting the public against dishonesty, malpractice or other seriously improper behaviour for example, investigating complaints, clinical concerns, regulatory breaches or investigations.



HOW WE PROTECT YOUR DATA

We take the security of your data seriously and take all appropriate steps to protect it from unauthorised access, loss and misuse. We never sell any of your personal data for any purpose. Any sensitive personal data we may collect (such as medical records) is never used for marketing purposes and access to such data is further restricted.

HOW LONG DO WE KEEP YOUR DATA?

We retain your records for certain periods (depending on the particular type of record) under our retention of records policy or as required by law or guidance. This is to ensure that information is properly managed and is available whenever and wherever there is a justified need for that information, including to support patient care and continuity of care; to support evidence-based clinical practice and to assist clinical and other audits; to support our legitimate interests, and to meet legal requirements.

COOKIES & SIMILAR TECHNOLOGIES

To help us give you the best possible experience, our websites and emails contain cookies, web beacons and similar technologies. Cookies are small, harmless text files that are downloaded to your computer/device when you visit websites. They serve a range of purposes such as helping us understand our website usage, activity and user behaviour.

WHO DO WE SHARE YOUR DATA WITH?

We never sell your data to any third parties. We want to maintain your trust as a reputable company and believe this is essential to ensure this. However, we may have to share your data for the purposes outlined above. As such, we may share your data with:

- Those involved in your treatment, such as: doctors, clinicians and other health-care professionals.
- Service providers that help us deliver our emails and electronic communications to you support our website, phone handling and other IT/business systems; and provide analytics services.
- Third party advertising platforms such as but not limited to Meta, Google and
 Microsoft to show you our services that might interest you whilst you're browsing the
 internet or on social media platforms. This is based on your acceptance of cookies on
 our websites.



- People or organisations we have to, or are allowed to, share your personal data with by law for example, for fraud-prevention or safeguarding purposes, or for regulatory investigations, including with the Care Quality Commission and medical or professional regulators such as the General Medical Council.
- A third party if we restructure or transfer our business or its assets or have a merger or re-organisation (in which case personal data we hold about our patients or visitors to the website may be one of the assets the third party takes over).
- Any member of our group.
- Where necessary to comply with our obligations or as permitted by law and with our legal and other professional obligations.

We require all third parties who process data on our behalf to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

WHAT ARE YOUR RIGHTS?

You have many rights relating to your personal data including:

- The right to access the personal data we hold about you.
- The right to request the correction of inaccurate data about you. If we hold inaccurate or out of date information about you, you can request that we change or update it.
- The right to request that we delete your data or stop processing it in some instances such as where we no longer need it, we can delete your personal data.
- The right to stop direct marketing You have the absolute right to stop our use of your personal data for direct marketing purposes. In this instance we must always comply with your request.
- The right to withdraw your consent. Whenever you have given us your consent to use your personal data, you have the right to change your mind and tell us.

Please note there may be instances where we refuse your request for any of the above (unless otherwise stated) where we have a strong overriding reason or are legally obliged to. We may also be required to continue to hold healthcare records for you in order to comply with law or to provide care to you.



If you wish to exercise any of your rights, have a complaint or questions about this policy, please see the "Who are we?" section for contact details.

HOW TO STOP MARKETING MESSAGES FROM US

There are several ways you can stop receiving marketing messages from us:

- Clicking the "unsubscribe" link at the top or bottom of any of our marketing emails.
- Send a request to unsubscribe by replying directly to any of our marketing emails.

Please note these actions will only stop emails that are not related to booking confirmation and payment confirmation. You may still receive email correspondence, for example, emails to confirm your appointments.

In most cases your request will be processed immediately but occasionally it may take a few days to take effect so you may still receive emails from us during this time.

If you have previously unsubscribed but change your mind and wish to be included in our emails again, please call us or let us know. We will email you a request which you need to open and accept to start receiving our emails again.

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 information 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 notice of every website you visit.

CHANGES TO THIS PRIVACY POLICY

We may update this privacy policy from time to time to reflect how we use your personal data. We will notify you by e-mail (if we hold your email details) or as appropriate (through suitable means through our website or otherwise) of any material changes.

COMPLAINTS

If you have concerns about aspects of the way your data has been handled or used by us and are not satisfied with our response, you can report your concerns to the UK Information Commissioner Office (ICO).



Details of how to do this are on the ICO website (https://ico.org.uk).

ANY QUESTIONS?

We hope this privacy policy has been helpful in setting out the way we handle your personal data and your rights. If you have any questions that haven't been covered, please contact at m.rituals_aesthetics@icloud.com

Or write to:

M.Rituals & Aesthetics

9 Charing Cross Norwich Norfolk NR2 4AX