

PRIVACY POLICY

Nick T Therapies is committed to protecting and respecting your privacy.

Nick T Therapies understands that your personal data is entrusted to us and appreciates the importance of protecting and respecting your privacy. To this end we comply fully with the data protection law in force in the UK and General Data Protection Regulations (GDPR) and with all applicable clinical confidentiality guidelines.

Our Privacy Notice tells you what we do with your personal data, why we use it, who we share it with and how long we keep it. As it's your data you have the right to know what happens with it. The types of data that we hold about you and how long we keep it, will depend on your relationship with us and the reasons why we have it.

For the purpose of the General Data Protection Regulations and Data Protection Act 2018 (the **Act**), the data controller is Nick T Therapies of sauna@nickttherapies.com.

Our nominated representative for the purpose of the Act is Nick Tettersell who is contactable on sauna@nickttherapies.com

THE PURPOSES AND LEGAL REASONS FOR PROCESSING YOUR PERSONAL DATA

We may use your personal data for the following purposes:

- to enable us to carry out our obligations to you arising from any contract entered between you and us including relating to the provision by us of services or treatments to you and related matter such as, billing, accounting and audit. This may also include taking steps at the request of the you, the patient, with a view of entering a contract.
- to send you appointment reminders
- provide you with information, products or services that you request from us
- to comply with legal obligations regarding record keeping. We may hold your records longer to maintain our financial records accurately.
- provide you with information about products or services we offer that we feel may interest you. If you have consented to receive marketing communications by electronic means from us, by ticking the relevant box on the form on which we collect your data, we will only contact you by electronic means (e-mail or SMS) with information about products and services similar to those which you previously purchased or enquired about from us
- notify you about changes to our products or services by means of legitimate interest
- respond to requests where we have a legal or regulatory obligation to do so
- check the accuracy of information about you and the quality of your treatment or care, including auditing medical and billing information for insurance claims as well as part of any claims or litigation process
- assess the quality and/or type of care you have received (including giving you the opportunity to complete customer satisfaction surveys) and any concerns or complaints you may raise, so that these can be properly investigated
- to conduct and analyse market research
- to ensure that content from any of our websites is presented in the most effective manner for you and for your computer.

WHAT CATEGORIES OF PERSONAL DATA WE MAY COLLECT FROM YOU

We may hold and use personal data about you as a customer, a patient or in any other capacity, for example, when you visit one of our websites, complete a form, access our services, or speak to us. Depending on what services you receive from us this may include sensitive personal data such as information relating to your health.

- information that you give us when you enquire or become a customer or patient of us or apply for a job with us including name, address, contact details (including email address and phone number)
- the name and contact details (including phone number) of your next of kin or emergency contact details
- details of referrals, quotes and other contact and correspondence we may have had with you
- details of services and/or treatment you have received from us, or which have been received from a third party and referred on to us
- information obtained from customer surveys, promotions, and competitions that you have entered or taken part in
- notes and reports about your health and any treatment and care you have received and/or need, including about clinic and hospital visits and medicines administered
- patient feedback and treatment outcome information you provide
- information about complaints and incidents
- information you give us when you make a payment to us. We do not store any payment card details.
- 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 or health care providers who have obtained your permission to share information about you.

Where you have named someone as your next of kin or emergency contact details 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.

The data that we request from you may include sensitive personal data. This includes information that relates to medical conditions (which may include children's data). By providing us with sensitive personal data, you give us your explicit consent to process this sensitive personal data for the purposes set out in this Privacy Policy.

HOW DO WE GET INFORMATION?

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- You have made an information request to us
- You booked an appointment or booked to attend / have attended an event
- You subscribe to our digital newsletter
- You visited our website and made an account with us, used an online form or commented on a blog post
- You engaged with us on social media
- You commented or reviewed on one of our products or services
- You ordered a product or service from Nick T Therapies and financial information was taken to fulfil the order
- You have applied for a job / secondment / internship / apprenticeship with us
- You are representing your organisation to make an enquiry
- You have completed a survey or competition that we are delivering or supporting.
- You purchased a gift voucher
- You applied for a training course

We also receive information indirectly

- Details of your visits to our site including, but not limited to, traffic data, location data, device model and version, operating system, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.
- From time to time, we may receive personal information about you from third party sources – for example, partners with whom we offer co-branded services or events, or engage in joint marketing activities, and publicly available sources such as social media websites.

Our website is not intended for, or targeted at, children under 16, and we do not knowingly or intentionally collect information about children under 16. If you believe that we have collected information about a child under 16, please contact us at sauna@nickttherapies.com, so that we may delete the information.

IP ADDRESSES / LOG FILES

When you use our services or view content provided by us, we automatically collect information about your computer hardware and software. This information can include your IP address, browser type, domain names, internet service provider (ISP), the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system, clickstream data, access times and referring website addresses. This information is used by Nick T Therapies to provide general statistics regarding use of the Nick T Therapies website. This is statistical data about our users' browsing actions and patterns and is not used to identify any individual.

HOW DO WE USE YOUR PERSONAL DATA?

Your personal data will be kept confidential and secure and will, unless you agree otherwise, only be used for the purpose(s) for which it was collected and in accordance with this Privacy Policy, applicable GDPR Laws, clinical records retention periods and clinical confidentiality guidelines.

Sensitive personal data related to your health will only be disclosed to those involved with your treatment or care, or in accordance with UK laws and guidelines of our professional bodies or for the purpose of clinical audits (unless you object). Further details on how we use health related personal data are given below. We will only use your sensitive personal data for the purposes for which you have given us your explicit consent to use it. Please note that, although we have set out the purposes for which we may use your personal data below, we will not use your sensitive personal data for those purposes unless you have given us your explicit consent to do so.

HOW LONG DO WE KEEP YOUR PERSONAL DATA?

Any personal data you provide will be held for as long as is necessary having regard to the purpose for which it was collected and in accordance with all applicable UK laws. We will retain your medical notes and contact details indefinitely for the purposes of any possible litigation or legal claims/complaints and to maintain our financial history and records accurately.

HOW DO WE SECURE YOUR PERSONAL DATA?

We protect all personal data we hold about you by ensuring that we have appropriate organisational and technical security measures in place to prevent unauthorised access or unlawful processing of personal data and to prevent personal data being lost, destroyed or damaged.

All information you provide to us is stored securely.

WHERE WE STORE YOUR PERSONAL DATA

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. Nick T Therapies **OR** We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password

which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to prevent unauthorised access.

USES MADE OF THE INFORMATION

We use information held about you in the following ways:

- To ensure that content from our site is presented in the most effective manner for you and for your device.
- To provide you with information, products, or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.
- To carry out our obligations arising from any contracts entered in to, between you and us.
- To allow you to participate in interactive features of our service when you choose to do so.
- To notify you about changes to our service.

SHARING YOUR INFORMATION

We never sell Personal Information to any third party

We use data processors who are third parties who provide elements of services for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct. For example, we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns.

We may send information or Nick T Therapies content to you which we think may be of interest to you by post, email, or other means and send you marketing communications relating to our business. In the case of loyalty scheme members, we'll also offer you relevant rewards.

We may promote use of our services to you and share promotional and information content with you in accordance with **your** communication preferences.

We may provide other companies with statistical information about our users -- but this information will not be used to identify any individual user.

We may send information to you regarding changes to our Customer Terms of Service, Privacy Policy, other legal agreements **OR** to meet legal requirements.

The data privacy law allows this as part of our legitimate interest in understanding our customers and providing the highest levels of service.

If you wish to change how we use your data, you'll find details in the ['Your Rights' section below](#).

We may, from time to time, contact you on behalf of external business partners about a particular offering that may be of interest to you. In those cases, we do **not** transfer your Personal Information to the third party.

We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 500 women aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, men in SW1). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.

LEGAL BASIS FOR PROCESSING PERSONAL INFORMATION (EEA VISITORS)

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it. However, we will normally collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from you.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information). Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

We may disclose your personal information to third parties:

- If We (or our assets) are acquired by another company, whether by merger, acquisition, bankruptcy or otherwise, that company would receive all information gathered by NICK T THERAPIES on the websites and through service provision. In this event, you will be notified via email and/or a prominent notice on our website, of any change in ownership, uses of your Personal Information, and choices you may have regarding your Personal Information.
- We reserve the right to use or disclose your Personal Information if required by law or if we reasonably believe that use or disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or comply with a law, court order, or legal process.

YOUR RIGHTS

As we are processing your personal data for our legitimate interests as stated above, you have the right to object to our processing of your personal data. There are legitimate reasons why we may refuse your objection, which depend on why we are processing it.

You have the right to ask us not to process your personal information. You can exercise your right to prevent marketing use of your Personal Information by checking tick boxes on the forms we use to

collect your data. You can also exercise the right at any time by contacting us at sauna@nickttherapies.com.

Our site, from time to time, may contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

HOW WE PROTECT YOUR PERSONAL INFORMATION

We know how much data security matters to all our customers, and we will treat your data with the utmost care and take all appropriate steps to protect it.

We secure access to all transactional areas of our websites using 'https' technology.

Access to your personal data is password-protected, and sensitive data such as payment card information) is secured to ensure it is protected.

We regularly monitor our system for possible vulnerabilities and attacks.

RETENTION OF PERSONAL INFORMATION

How long we keep information we collect about you depends on the type of information. as described in further detail below. After such time, we will either delete or anonymize your information or, if this is not possible, then we will securely store your information and isolate it from any further use until deletion is possible.

We retain Personal Information that you provide to us where we have an ongoing legitimate business need to do so (for example, as long as is required in order to contact you about a service you have signed up to, or as needed to comply with our legal obligations, resolve disputes and enforce our agreements).

When we have no ongoing legitimate business need to process your Personal Information, we securely delete the information or anonymise it or, if this is not possible, then we will securely store your Personal Information and isolate it from any further processing until deletion is possible. We will delete this information from the servers at an earlier date if you so request, as described in "[To Unsubscribe from Our Communications](#)" below.

HOW TO ACCESS & CONTROL YOUR PERSONAL DATA

Reviewing, Correcting and Removing Your Personal Information

You have the following data protection rights:

- You can request access, correction, updates or deletion of your personal information.
- You can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information.
- If we have collected and processed your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

- You have the right to complain to a data protection authority about our collection and use of your personal information. Contact details for [data protection authorities in the UK are available here](#).

To exercise any of these rights, please contact us at sauna@nickttherapies.com, using the subject title: Privacy. We will respond to your request to change, correct, or delete your information within a reasonable timeframe and notify you of the action we have taken.

TO UNSUBSCRIBE FROM OUR COMMUNICATIONS

You may unsubscribe from our marketing communications by clicking on the "unsubscribe" link located on the bottom of our e-mails, updating your communication preferences, or by sending us email us at sauna@nickttherapies.com with the subject title 'Privacy'.

CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. We regularly review and, where necessary, update our privacy information.

If we plan to use personal data for a new purpose, we update our privacy information and communicate the changes to individuals before starting any new processing.

CONTACT

Any questions, comments and requests regarding this privacy notice are welcomed and should be addressed to sauna@nickttherapies.com.