

# Privacy Policy

## 1. Introduction

This privacy notice provides you with details of how we collect and process your personal data as a client and through your use of our site [www.clinicc.co.uk](http://www.clinicc.co.uk) including any information you may provide through our site when you make an enquiry.

By providing us with your data, you warrant to us that you are over 16 years of age.

Clinic C is the data controller and we are responsible for your personal data (referred to as “we”, “us” or “our” in this privacy notice).

### 1.1. Contact Details

Our full details are:

Clinic C Health & Aesthetics

Email address: [info@clinic-c.co.uk](mailto:info@clinic-c.co.uk)

Postal address: Clinic C, 365 Holburn Street, Aberdeen, AB10 7FQ

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at [info@clinic-c.co.uk](mailto:info@clinic-c.co.uk)

## 2. What Data Do We Collect About You?

Personal data means any information capable of identifying an individual. It does not include anonymised data.

We may process certain types of personal data about you as follows:

- Identity Data may include your first name, maiden name, last name, title, date of birth and gender.
- Contact Data email address and telephone numbers.
- Transaction Data may include details about payments between us and you.
- Profile Data may include your interests, preferences, feedback and survey responses.
- Marketing and Communications Data may include your preferences in receiving marketing communications from us and your communication preferences

### 2.1. Special Category Data

When working with us as a client, we collect the following special category data:

- Client Consultaion Form

We need to collect the following special category data about you, in order to confirm your readiness to undertake physical activity or treatments with us. (We collect this data in our Client Medical Consultation Form) which you complete prior to beginning any activity with us.

- Body Analysis

We offer clients the opportunity to have their body composition analysed using AccunIQ Body Composition Analyser. This is entirely voluntary. The delivery of this service necessitates the collection of special category data about your body composition.

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## **3. How We Collect Your Personal Data**

We collect data about you through a variety of different methods including:

- Direct interactions: You may provide data by filling in forms on our site (or otherwise) or by communicating with us by post, phone, email or otherwise.

## **4. How We Use Your Personal Data**

We will only use your personal data when legally permitted. The most common uses of your personal data are:

- Where we need to perform the contract between us.
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal ground for processing your personal data. In relation to sending marketing communications to you via email or text message, we rely on legitimate interests as the legal ground for processing your personal data. You have the right to opt out of these communications at any time by emailing us at [info@clinic-c.co.uk](mailto:info@clinic-c.co.uk)

### **4.1. Purposes for processing your personal data**

Set out below is a description of the ways we intend to use your personal data and the legal grounds on which we will process such data. We have also explained what our legitimate interests are where relevant.

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 email us at [info@clinic-c.co.uk](mailto:info@clinic-c.co.uk) if you need details about the specific legal ground we are relying on to process your personal data.

### **4.2. Marketing communications**

You can ask us to stop sending you marketing messages at any time by emailing us at [info@clinic-c.co.uk](mailto:info@clinic-c.co.uk)

Where you opt out of receiving our marketing communications, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

### **4.3. Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to find out more about how the processing for the new purpose is compatible with the original purpose, please email us at:

[info@clinic-c.co.uk](mailto:info@clinic-c.co.uk).

If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

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## 5. Disclosures of your Personal Data

We may have to share your personal data with the parties set out below for the purposes set out in paragraph 4 above:

- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions and your permission.

## 6. Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 7. Data Retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see below for further information.

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## **8. Your Legal Rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please email us at [info@clinic-c.co.uk](mailto:info@clinic-c.co.uk).

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **9. 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 notice of every website you visit.