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## Privacy Policy

This is the privacy notice of **EDEN WELLNESS THERAPIES OF HARLEY STREET LONDON LTD. Eden Wellstyle is a trading name of Eden Wellness Therapies of Harley Street, London Ltd. Company Number 13496691.** ('we', 'our', or 'us'). Our Registered Office: Suite G04, 1 Quality Court, Chancery Lane, London, WC2A 1HR.

**Introduction** This policy describes how we collect, store, transfer and use personal data. It tells you about your privacy rights and how the law protects you.

In the context of the law and this notice, 'personal data' is information that clearly identifies you as an individual or which could be used to identify you if combined with other information. Acting in any way on personal data is referred to as 'processing'.

**This notice applies to personal data collected through** our website, through social media platforms, emails and online retail and referral platforms, including [www.edentherapiesharleystreet.co.uk](http://www.edentherapiesharleystreet.co.uk) [www.edenwellstyle.health](http://www.edenwellstyle.health) [www.typeform.com](http://www.typeform.com) [www.calendly.com](http://www.calendly.com) [www.pipedrive.com](http://www.pipedrive.com) [www.docusign.com](http://www.docusign.com) [www.gocardless.com](http://www.gocardless.com) [www.stripe.com](http://www.stripe.com) [www.qbcheck.com](http://www.qbcheck.com) facebook: Eden Wellness Therapies, Instagram: edenwellstyle, LinkedIn: e///denwellstyle, Twitter @EdenwellstyleUK

Except as explicitly set out below, we do not share, or sell, or disclose to a third party, any information collected through any of the aforementioned platforms.

**Data Protection Officer** We have appointed a data protection officer ('DPO') who is responsible for ensuring that our privacy policy is followed. If you have any questions about how we process your personal data, including any requests to exercise your legal rights, please contact our DPO, Dov Benyaacov- Kurtzman) at [dov@edenwellnesstherapies.me.uk](mailto:dov@edenwellnesstherapies.me.uk)

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### Personal data we process

#### 1. How we obtain personal data

The information we process about you includes information:

- you have directly provided to us
- that we gather from third party databases and service providers
- as a result of monitoring how you use our website or our services 'cookies'

#### 2. Types of personal data we collect directly

When you use our website, our services or buy from us, (for example, when you make a referral or engage with our services as an associate (client) or contractor) we ask you to provide personal data. This can be categorised into the following groups:

- personal identifiers, such as your first and last names, your title, gender identifier and your date of birth
- contact information, such as your email address, your telephone number and your postal addresses for billing, delivery and communication
- Service provision requested, NHS number, GPs name and address.
- PCI compliant transaction payment information, (such as a debit or credit card number and expiry date and bank account details)
- records of communication between us including messages sent through our website, email messages, Whatsapp, voicemails and telephone conversations
- marketing preferences that tell us what types of marketing you would like to receive- dont have this yet?

In addition, we may also process:

- documentation that confirms your identity, such as an image of your passport or driver's licence
- an image that shows your face, such as a passport photograph
- documentation that confirms the qualifications you advertise as holding
- documentation that confirms your employment, such as recent payslips

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- documentation that confirms your address, such as a tenancy agreement or rental contract, or a household bill
- documentation that details your medical history, including medication and or diagnosis.
- Documentation that provides an expert or other clinical/non clinical opinion from school, colleges, institutions, workplaces, consultants, GPs, family and any other significant relationship.

### 3. Types of personal data we collect from third parties

We confirm some of the information you provide to us directly using data from other sources. We also add to the information we hold about you, sometimes to remove the need for you to provide it to us, and sometimes in order to be able to assess the quality of the services you offer if you are a contractor.

The additional information we collect can be categorised as follows:

- information that confirms your identity (regulatory bodies)
- business information, including your business trading name and address, your company number (if incorporated), your Unique tax Reference (UTR) code and your VAT number (if registered)
- information that confirms your contact information
- reviews and feedback about your business on other websites through which you sell your services
- Professional conduct, unsolicited complaints and or reviews by other users

### 4. Types of personal data we collect from your use of our services

By using our website and our services, we process:

- information you contribute to our community, including reviews
- your replies to feedback polls and surveys
- technical information about the hardware and the software you use to access our website and use our services, including your Internet Protocol (IP) address, your browser type and version and your device's operating system

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- usage information, including the frequency you use our services, the pages of our website that you visit, whether you receive messages from us, whether you read those messages and whether you reply to those messages
- transaction information that includes the details of the products services you have bought from us and payments made to us for those services
- your preferences to receive marketing from us; how you wish to communicate with us; and responses and actions in relation to your use of our services.

### 5. **Our use of aggregated information**

We may aggregate anonymous information such as statistical or demographic data for any purpose. Anonymous information is that which does not identify you as an individual. Aggregated information may be derived from your personal data but is not considered as such in law because it does not reveal your identity.

For example, we may aggregate usage information to assess whether a feature of our website is useful or to complete service audits.

However, if we combine or connect aggregated information with your personal data so that it can identify you in any way, we treat the combined information as personal data, and it will be used in accordance with this privacy policy.

### 6. **Special personal data**

Special personal data is data about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data.

We may collect special personal data about you if this is central to the information you disclose/provide at referral or to enable us to triage your care to a relevant contractor or wellness provider. We may also collect special personal data when there is a lawful basis on which to do so.

### 7. **If you do not provide personal data we need**

Where we need to collect personal data by law, or under the terms of a service contract we have with you, and you fail to provide that data when requested, we may not be able to perform that contract.

In that case, we may have to stop providing a service to you or end our agreement with you. If so, we will notify you of this at the time.



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## **The bases on which we process information about you**

The law requires us to determine under which of six defined bases we process different categories of your personal data, and to notify you of the basis for each category.

If a basis on which we process your personal data is no longer relevant then we shall immediately stop processing your data.

If the basis changes, then if required by law, we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

## **8. Information we process because we have a contractual obligation with you**

When you make a referral via the website, or when applying for a position of self employment, when buying a product or service from us, or otherwise you agree to our terms and conditions, a contract is formed between you and us.

In order to carry out our obligations under that contract we must process the information you give us. Some of this information may be personal data.

We may use it in order to:

- verify your identity for security purposes when you use our services
- sell products to you
- provide you with our services
- provide you with suggestions and advice on products, services and how to obtain the most from using our website

We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract.

We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

## **9. Information we process with your consent**

Through certain actions when there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our business, or career development opportunities, and/or our products and services, you provide your consent to us to process information that may be personal data.

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Wherever possible, we aim to obtain your explicit consent to process this information, for example, we ask you to agree to our use of non-essential cookies when you access our website.

If you have given us explicit permission to do so, we may from time to time pass your name and contact information to selected associates/contractors respectively whom we consider may provide you with services or products, or alternatively require your services or products.

We continue to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us at [admin@edenwellnesstherapies.me.uk](mailto:admin@edenwellnesstherapies.me.uk) or [www.edentherapiesharleystreet.co.uk](http://www.edentherapiesharleystreet.co.uk). However, if you do so, you may not be able to use our website or our services further.

We aim to obtain and keep your consent to process your information. However, while we take your consent into account in decisions about whether or not to process your personal data, the withdrawal of your consent does not necessarily prevent us from continuing to process it. The law may allow us to continue to process your personal data, provided that there is another basis on which we may do so. For example, we may have a legal obligation to do so.

### 10. Information we process for the purposes of legitimate interests

We may process information on the basis there is a legitimate interest, either to you or to us, of doing so.

Where we process your information on this basis, we do after having given careful consideration to:

- whether the same objective could be achieved through other means
- whether processing (or not processing) might cause you harm
- whether you would expect us to process your data, and whether you would, in the round, consider it reasonable to do so

For example, we may process your data on this basis for the purposes of:

- improving our services
- record-keeping for the proper and necessary administration of our business
- responding to unsolicited communication from you to which we believe you would expect a response
- preventing fraudulent use of our services

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- exercising our legal rights, including to detect and prevent fraud and to protect our intellectual property
- insuring against or obtaining professional advice that is required to manage business risk
- protecting your interests where we believe we have a duty to do so

### 11. Information we process because we have a legal obligation

Sometimes, we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as the unlikely event of a search warrant or court order.

This may include your personal data.

### 12. Information we process to protect vital interests

In situations where processing personal information is necessary to protect someone's life, where consent is unable to be given and where other lawful bases are not appropriate, we may process personal information on the basis of vital interests.

## How and when we process your personal data

### 13. Your personal data is not shared

We will only share or disclose to a third party contractor (specialist independent wellness provider) the information you choose to submit via the referral process as this is pertinent to access the care services requested. Any other personal data information collected through our website is not shared with any third party.

### 14. Information you provide

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Our website allows you to post information with a view to that information being read, copied, downloaded, or used by other people.

For example, when you leave a review or post a message on our website or across social media platforms, we reasonably assume that you consent for the message to be seen by others. We may include your username with your message, and your message may contain information that is personal data.

Other examples include:

- tagging an image
- clicking on an icon next to another visitor's message to convey your agreement, disagreement or thanks

In posting personal data, it is up to you to satisfy yourself about the privacy level of every person who might use it.

We do not specifically use this information except to allow it to be displayed or shared. We do store it, and we reserve a right to use it in the future in any way we decide.

We may ask our contractors to provide us with information to showcase their professional profile in the public domain. This may be uploaded onto the website, any social media channels or in a physical brochure for marketing purposes. The information provided may be indexed by search engines or used by third parties. The information you provide on that profile should be understood as available to the public.

Once your information enters the public domain, we have no control over what any individual third party may do with it. We accept no responsibility whatsoever for their actions at any time.

Provided your request is reasonable and there is no legal basis for us to retain it, then at our discretion we may agree to your request to delete personal data that you have posted. You can make a request by contacting us at [admin@edenwellnesstherapies.me.uk](mailto:admin@edenwellnesstherapies.me.uk) or via [www.edentherapiesharleystreet.co.uk](http://www.edentherapiesharleystreet.co.uk).

### 15. **Payment information**

Payment information is never taken by us or transferred to us either through our chosen payment portals or otherwise. Our employees and independent wellness contractors never have access to it.

At the point of payment, you are transferred to a secure page on the website of GoCardless, Stripe or some other reputable payment service provider depending on the type of payment service you opt for. That page may be branded to look like a page on our website, but it is not controlled by us.

### 16. **Direct Debit information**





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When you agree to set up a Direct Debit arrangement with go cardless, the information you give to them is held within the payment portal itself for processing according to our agreed instructions, amount and term. Your bank details are not shared with us and we do not have or keep a copy. Your banking information is held with the direct debit provider who is registered under the direct debit guarantee scheme.

This allows the customer's bank to refund disputed payments without question, pending further investigation. Direct Debits can only be set up for payments to beneficiaries that are approved originators of direct debits. In order to be approved, these beneficiaries are subjected to careful vetting procedures. Once approved, they are required to give indemnity guarantees through their banks.

#### **17. Career Development, employment and self employment**

If you send us information in connection with a career development opportunity, we may keep it for up to three years in case we decide to contact you at a later date.

If we employ you or partner with you as a contractor on a self employed basis, we collect information about you and your work from time to time throughout this period. This information will be used only for purposes directly relevant to your employment or self employment. After your employment or self employed contract has ended, we will keep your file for six years before destroying or deleting it. .

#### **18. Information obtained from third parties**

Although we do not disclose your personal data to any third party (except as set out in this notice), we sometimes receive data that is indirectly made up from your personal data from third parties whose services we use. No such information is personally identifiable to you.

#### **19. Third party advertising on our website**

Third parties may advertise on our website. In doing so, those parties, their agents or other companies working for them may use technology that automatically collects information about you when their advertisement is displayed on our website.

They may also use other technology such as cookies or JavaScript to personalise the content of, and to measure the performance of their adverts.

We do not have control over these technologies or the data that these parties obtain. Accordingly, this privacy notice does not cover the information practices of these third parties.

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### 20. Disputes between users

In the event of a dispute between you and another user, provided that you consent, we may share your basic personal data, business information and contact information with the other user.

At our discretion, we may share other information to enable the dispute to be resolved through litigation or alternative dispute resolution methods.

### 21. Service providers and business partners

We may share your personal data with businesses that provide services to us, or with business partners.

As examples:

- we may use fraud prevention agencies to verify your identity and we may pass your information to those agencies if we strongly suspect fraud on our website to gain access to our services
- we will never pass your contact information to advertising agencies to use, to promote our services to you

### 22. Referral partners

We may choose to use a referral partner(s). This is information given to us by you in your capacity as an affiliate or contractor of us or as a referral partner.

It allows us to recognise 'track' visitors that you have referred to us. When explicitly agreed, this will also allow us to credit to you commission due for such referrals. Commission should not be expected unless agreed. This will also include information that allows us to transfer commission to you.

The information is not used for any other purpose.

We undertake to preserve the confidentiality of the information and of the terms of our relationship.

We expect any affiliate or partner to agree to reciprocate this policy.

### Use of information we collect through automated systems

### 23. Cookies

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Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit a website that uses them. They allow information gathered on one web page to be stored until it is needed for use at a later date.

They are commonly used to provide you with a personalised experience while you browse a website, for example, allowing your preferences to be remembered.

They can also provide core functionality such as security, network management, and accessibility; record how you interact with the website so that the owner can understand how to improve the experience of other visitors; and serve you advertisements that are relevant to your browsing history.

Some cookies may last for a defined period of time, such as one visit (known as a session), one day or until you close your browser. Others last indefinitely until you delete them.

Your web browser should allow you to delete any cookie you choose. It should also allow you to prevent or limit their use. Your web browser may support a plug-in or add-on that helps you manage which cookies you wish to allow to operate.

The law requires you to give explicit consent for use of any cookies that are not strictly necessary for the operation of a website.

When you first visit our website, we ask you whether you wish us to use cookies. If you choose not to accept them, we shall not use them for your visit except to record that you have not consented to their use for any other purpose.

We may use cookies in the following ways:

- to track how you use our website
- to record whether you have seen specific messages we display on our website
- to keep you signed in to our website
- to record your answers to surveys and questionnaires on our site while you complete them
- to record the conversation thread during a live chat with our support team

#### **24. Personal identifiers from your browsing activity**

Requests by your web browser to our servers for web pages and other content on our website are recorded.

We record information such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution.

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We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.

If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to our website.

### **25. Re-marketing**

Re-marketing involves placing a 'tracking technology' such as a cookie, a 'web beacon' (also known as an 'action tag' or a 'single-pixel GIF') to track which pages you visit and to serve you relevant adverts for our services when you visit some other website.

The benefit of re-marketing technology is that we can provide you with more useful and relevant adverts, and not show you ones repeatedly that you may have already seen.

We may use a third-party advertising service to provide us with re-marketing services from time to time. If you have consented to our use of such tracking technologies, you may see advertisements for our products and services on other websites.

We do not provide your personal data to advertisers or to third-party re-marketing service providers. However, if you are already a member of a website whose affiliated business provides such services, that affiliated business may learn of your preferences in relation to your use of our website.

### **Other matters**

### **26. Your rights**

The law requires us to tell you about your rights and our obligations to you in regard to the processing and control of your personal data.

We do this now, by requesting that you read the information provided at <http://www.knowyourprivacyrights.org>

### **27. Use of our services by children**

We do not sell products or services directly to children under the age of 18 without parental consent. Due to the nature of our business, we do provide access to services for children. These services can only be referred and purchased by a responsible adult (parent or guardian).

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Our website is designed for inclusive use, providing wellness services, options and educational/blog content. This may be accessed or used by children, however are not specifically marketed to them.

If you are under 18, you may use our website, however you are unable to access services without consent from a parent or guardian.

We collect data about all users of and visitors to these areas regardless of age, and we anticipate that some of those users and visitors will be children.

### **28. Encryption of data sent between us**

Whenever information is transferred between us, you can check that it is done so in an encrypted manner using Secure Sockets Layer (SSL) by looking for a closed padlock symbol or other trust mark in your browser's URL bar or toolbar.

### **29. Delivery of services using third party communication software**

With your consent, we may communicate using software provided by a third party such as Meta (WhatsApp), Apple (Facetime), Microsoft (Skype) or Zoom Video Communications (Zoom).

Such methods of communication should secure your personal data using encryption and other technologies. The providers of such software should comply with all applicable privacy laws, rules, and regulations, including the GDPR.

If you have any concerns about using a particular software for communication, please tell us.

### **30. Data may be processed outside the UK**

Our websites are hosted in the United Kingdom (UK)

We may also use outsourced services in countries outside the UK from time to time in other aspects of our business.

Accordingly data obtained within the UK or any other country could be processed outside the UK.

We use the following safeguards with respect to data transferred outside the UK:

- the processor is within the same corporate group as our business or organisation and abides by the same binding corporate rules regarding data processing.

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- the data protection clauses in our contracts with data processors include transfer clauses written by or approved by a supervisory authority.
- we comply with a code of conduct approved by a supervisory authority.
- we are certified under an approved certification mechanism as provided for in the Act.
- both our organisation and the processor are public authorities between whom there is either a legally binding agreement or administrative arrangements approved by a supervisory authority relating to protection of your information.

### 1. Control over your own information

It is important that the personal data we hold about you is accurate and up to date. Please inform us if your personal data changes.

At any time, you may contact us to request that we provide you with the personal data we hold about you.

At any time you may review or update personally identifiable information that we hold about you, by signing in to your account on our website.

To obtain a copy of any information that is not provided on our website you should contact us to make that request.

All requests to access information we have about you should be sent via email to [dov@edenwellnesstherapies.me.uk](mailto:dov@edenwellnesstherapies.me.uk)

When we receive any request to access, edit or delete personal data we first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

The law allows us to charge for such provision if doing so incurs costs for us. After receiving your request, we will tell you when we expect to provide you with the information, and whether we require any fee for providing it to you.

If you wish us to remove personally identifiable information from our website, you should contact us to make your request.

This may limit the service we can provide to you.

We remind you that we are not obliged by law to delete your personal data or to stop processing it simply because you do not consent to us doing so. While having your consent is an important consideration as to whether to process it, if there is another legitimate basis on which we may process it, we may do so on that basis.

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## 2. Communicating with us

When you contact us, whether by telephone, through our website or by email, we collect the data you have given to us in order to reply with the information you need.

We record your request and our reply in order to increase the efficiency of our business.

We may keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high quality service.

## 3. Complaining

If you are not happy with our privacy policy, or if you have any complaint, then you should tell us.

You can find further information about our complaint handling procedure at <https://www.edentherapiesharleystreet.co.uk/>

When we receive a complaint, we record the information you have given to us on the basis of consent. We use that information to resolve your complaint.

We aim to investigate all complaints relating to user generated content. However, we may not be able to do so as soon as a complaint is made. If we feel that it is justified or if we believe that the law requires us to do so, we shall remove the content while doing so.

Making a complaint may not result in the removal of the content. Ultimately, we have to make a judgement as to whose right will be obstructed: yours, or that of the person who posted the content that offends you.

If we think your complaint is vexatious or without any basis, we may not correspond with you about it.

If your complaint reasonably requires us to notify some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion whether we do give information, and if we do, what that information is.

We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

If a dispute is not settled then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.

If you are in any way dissatisfied about how we process your personal data, you have a right to lodge a complaint with the Information Commissioner's Office (ICO). This can be done at <https://ico.org.uk/make-a-complaint/>. We would, however, appreciate the opportunity to talk to you about your concern before you approach the ICO.



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#### **4. Retention period**

Except as otherwise mentioned in this privacy notice, we keep your personal data only for as long as required by us. This is usually 6 years and in these circumstances:

- to provide you with the services you have requested
- to comply with other law, including for the period demanded by our tax authorities
- to support a claim or defence in court

#### **5. Compliance with the law**

Our privacy policy complies with the law in the United Kingdom, specifically with the Data Protection Act 2018 (the 'Act') accordingly incorporating the EU General Data Protection Regulation ('GDPR') and the Privacy and Electronic Communications Regulations ('PECR').

#### **6. Review of this privacy policy**

We shall update this privacy notice from time to time as necessary.