

## **Data Protection Policy/Privacy Notice.**

Rebecca Wellness takes its obligations regarding data protection seriously. As such, we are providing this notice (“Privacy Notice”) to you so that you are provided with information about how Rebecca Wellness collects and uses your Personal Data in accordance with applicable data protection law, including the General Data Protection Regulation 2016/679 (“GDPR”). Please read this Privacy Notice, as it contains important information of which you should be aware.

For the purposes of this Privacy Notice, (“Rebecca Wellness Customers”, “you” or “your”) means customers of Rebecca Wellness (“we”, “us” or “our”) means Rebecca Wellness.

Rebecca Wellness is the data controller regarding the processing of your Personal Data (as defined below). The data controller is the entity that determines how and why Personal Data is processed.

### **1. What do we collect and process?**

For Rebecca Wellness to deliver its services to you and manage its business efficiently, it is necessary for us to collect, maintain and process Personal Data about you. “Personal Data” is information which allows Rebecca Wellness to identify you as a customer.

We may collect information from you when you visit our website, purchase services from us, contact us by telephone, email or social media and receive a communication from us relating to your purchase.

The Personal Data which we process may include the following:

- Name and address
- Contact information (including telephone number and email address)
- Age/Date of birth
- Gender
- Your location
- Any medical conditions relevant to the services we provide
- Your communication preferences
- Bank account and payment card details and billing address

Personal Data will primarily be collected from you directly.

### **2. Why and for what purpose do we collect and use your Personal Data and Sensitive Personal Data and what is our lawful basis for doing so?**

Please note: this list may be updated from time to time and we will provide notice as and when such updates are made.

The term “processing” means any action taken, also with the help of electronic means, in connection with Personal Data, including collection, handling, use, transfer and disclosure by transmission, dissemination or otherwise making available, as well as recording, organisation, storage, retention, adaptation or alteration, access, retrieval, consultation, alignment or combination, blocking, anonymising, erasure, disposal or destruction.



<u>Personal Information</u>	<u>Basis of Processing</u>	<u>Purposes of Processing</u>
<ul style="list-style-type: none"><li>Name and address</li><li>Contact information (including telephone number and email address)</li><li>Bank account and payment card details and billing address</li><li>Details of your purchase or Personal Data contained in any other communication you make with us</li></ul>	Processing that is necessary to perform a contract or when taking steps in connection with a contract with you.	<ol style="list-style-type: none"><li>to help us identify you</li><li>to provide the services purchased by you and provide any related services or follow-up service or information as required</li><li>to process your payment(s) to us</li></ol>
<ul style="list-style-type: none"><li>Contact information provided voluntarily by you</li><li>Any special categories of personal data (physical or mental health data, or other data volunteered by you) required to ensure we can deliver your services and or deal with any specific concerns or enquiries raised by you.</li></ul>	<p>Where necessary, processing based on your freely given, specific, informed, and unambiguous consent.</p> <p>Where we process special categories of personal data about you, this will be with your explicit consent.</p>	<ol style="list-style-type: none"><li>to send marketing information, and newsletters to you by email, and text</li><li>to keep you updated on Rebecca Wellness services which may be of interest or relevance to you</li><li>to deal with concerns or enquiries which involve special categories of personal data about you, at your request and with your consent.</li></ol>
<ul style="list-style-type: none"><li>Name and address</li><li>Contact information (including telephone number and email address)</li><li>Bank account details</li></ul>	Processing that is necessary to comply with a legal obligation to which we as the data controller are subject (other than a contractual obligation).	<ol style="list-style-type: none"><li>to confirm your identity, keep records required by law or to evidence our compliance with laws, including tax laws, consumer protection laws and data protection laws. To provide information to law enforcement agencies or other authorities where we are required to do so.</li></ol>
<ul style="list-style-type: none"><li>Details of current and past services supplied to you</li><li>Age/Date of birth</li><li>Gender</li><li>Personal Data contained in any other communication you make with us</li><li>Your communication and marketing preferences</li><li>Your location</li></ul>	Processing that is necessary for our own legitimate interests. A description of our legitimate interests is set out below.	<ol style="list-style-type: none"><li>to respond to and/or deal with requests, enquiries, or complaints</li><li>for managing our business</li><li>for marketing purposes</li><li>to follow up with you by telephone in relation to an uncompleted sale</li><li>for the prevention and detection of crime</li><li>for statistical purposes</li></ol>

**Personal Information**

- Details of services you have expressed an interest in
- The Personal Data contained in any other communication you make with us

**Basis of Processing**

**Purposes of Processing**

7. for improving and changing our services and processes
8. for legal compliance

**Personal Data – Legitimate Interests**

The specific legitimate interest pursued and how this is balanced against your interests:

- to enable us to operate efficiently, and to ensure any issue you may have is dealt with effectively, efficiently, and fully.
- to manage customer accounts, including keeping general records of customers, sales, customer care and other interactions. This will ensure you receive the best service possible.
- to provide you with updates and promotional offers about our goods and/or services, where you have not opted out of receiving such communications from us. In doing so, we can ensure that we are providing you with relevant details of our products and services where these are of interest to you. These offer benefits to you and will hopefully save you money on future purchases.
- to target our direct marketing to you (where you have consented to receive it). This is necessary to build a better picture of the type of offers and products we can provide which you might be interested in, so that the communications you receive are more relevant to you and are not merely generic communications. We believe this is justified as you are in control over whether you receive our direct marketing.
- to follow up on any completed sales; in doing so we can deal with any outstanding queries.
- to protect ourselves from fraudulent transactions. This is necessary to protect genuine customers and our business from fraud to minimise the risk of false details being used, and abuse of card details by fraudsters.
- to improve the operation of our business and our marketing activity more generally, including to assess what is working and what is not in terms of our marketing activity or our service performance, so that we can develop our website, services and offers to be more relevant to our customers generally, to improve your online experience and the service we offer.

**3. To whom will your Personal Data be disclosed?**

Personal data will be shared and transferred from us to others,

- where required as matter of law (for example, to tax and social security authorities).
- where required to protect Rebecca Wellness legal rights (for example, to defend against litigation).
- for such other purposes as are notified to you by Rebecca Wellness from time to time.

#### 4. Security of your Personal Data

As stated above, Rebecca Wellness takes the protection of your Personal Data seriously and we have implemented technical, physical and organisational measures to ensure the Personal Data (and Sensitive Personal Data) of its customers is kept accurate, up to date and protected against unauthorised or accidental destruction, alteration or disclosure, accidental loss, unauthorised access, misuse, unlawful processing and/or damage.

#### 5. Data Retention

Rebecca Wellness will retain your Personal Data only for such period as is necessary to perform the purpose(s) for which it was collected. In many cases this means that Personal Data will be retained for the duration of the time that we provide services to you and then for a reasonable time thereafter in order to manage any problems, process any returns, manage our relationship with you, defend any claims, for tax purposes and/or for any other record keeping purposes. This period is typically a period of not less than 6 years from the date of delivery of your last order with us.

#### 6. Your Rights

You have certain legal rights, which are briefly summarised below, in relation to any personal data about you which we hold.

<u>Your right</u>	<u>What does it mean?</u>	<u>Limitations and conditions of your right</u>
Right of access	Subject to certain conditions, you are entitled to have access to your personal data (this is more commonly known as submitting a “data subject access request”).	<p>If possible, you should specify the type of information you would like to see to ensure that our disclosure is meeting your expectations.</p> <p>We must be able to verify your identity. Your request may not impact the rights and freedoms of other people, e.g. privacy and confidentiality rights of other individuals.</p> <p>If you exercise this right, you should specify the type of information you would like to receive (and where we should send it) where possible to ensure that our disclosure is meeting your expectations.</p>
Right to data portability	Subject to certain conditions, you are entitled to receive the personal data which you have provided to us and which is processed by us by automated means, in a structured, commonly-used machine readable format.	This right only applies if the processing is based on your consent or on our contract with you and when the processing is carried out by automated means (i.e. not for paper records). It covers only the personal data that has been provided to us by you.

<u>Your right</u>	<u>What does it mean?</u>	<u>Limitations and conditions of your right</u>
Rights in relation to inaccurate personal or incomplete data	<p>You may challenge the accuracy or completeness of your personal data and have it corrected or completed, as applicable.</p> <p>We encourage you to notify us of any changes regarding your personal data as soon as they occur, including changes to your contact details, telephone number.</p>	<p>This right only applies to your own personal data. When exercising this right, please be as specific as possible.</p>
Right to object to or restrict our data processing	<p>Subject to certain conditions, you have the right to object to or ask us to restrict the processing of your personal data.</p>	<p>As stated above, this right applies where our processing of your personal data is necessary for our legitimate interests. You can also object to our processing of your personal data for direct marketing purposes.</p>
Right to erasure	<p>Subject to certain conditions, you are entitled to have your personal data erased (also known as the “right to be forgotten”), e.g. where your personal data is no longer needed for the purposes it was collected for, or where the relevant processing is unlawful.</p>	<p>We may not be able to erase your personal data, if for example, we need it to (i) comply with a legal obligation, or (ii) exercise or defend legal claims.</p>
Right to withdrawal of consent	<p>As stated above, where our processing of your personal data is based on your consent you have the right to withdraw your consent at any time.</p>	<p>If you withdraw your consent, this will only take effect for future processing.</p>

Where our processing of your personal data is necessary for our legitimate interests, you can object to this processing at any time. If you do this, we will need to show either a compelling reason why our processing should continue, which overrides your interests, rights and freedoms or that the processing is necessary for us to establish, exercise or defend a legal claim.

If you would like to exercise any of your rights as described above (or if you have any questions about this Privacy Notice or concerns about our dealings with your Personal Data), please contact [rebecca-richards@hotmail.com](mailto:rebecca-richards@hotmail.com)

We will try to resolve any concerns you may have. However, if you consider that we are in breach of our obligations under data protection laws, you may lodge a complaint with the Information Commissioner’s Office (<https://ico.org.uk/concerns/>).

You have the right to lodge a complaint with a supervisory authority, in the Member State of your habitual residence, place of work or of an alleged infringement of the GDPR.

### Get in Touch

Phone: 07596986789

[Email us](#)