
PRIVACY POLICY

BACKGROUND:

Mrs S A Foster understands that your privacy is important to you and that you care about how your personal data is used. I respect and value the privacy of everyone who visits this website, www.sue-phlebotomist.uk and will only collect and use personal data in ways that are described here, and in a way that is consistent with my obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is requested when making a booking.

1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

“Account”	means an account required to access and/or use certain areas and features of My Site;
“Cookie”	means a small text file placed on your computer or device by My Site when you visit certain parts of My Site and/or when you use certain features of My Site. Details of the Cookies used by My Site are set out in Part 14, below; and
“Cookie Law”	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;

2. Information About Me

My Site is owned and operated by Mrs S A Foster, a Sole Trader.

Registered address: Coventry, UK.

Email address: enquiries@sue-phlebotomist.uk.

Telephone number: 07585149476.

I am a member of The Phlebotomy Centre,

3. What Does This Policy Cover?

This Privacy Policy applies only to your use of My Site. MySite may contain links to other websites. Please note that I have no control over how your data is collected, stored, or used by other websites and I advise you to check the privacy policies of any such websites before providing any data to them.

4. What Is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be

identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

5. **What Are My Rights?**

Under the Data Protection Legislation, you have the following rights, which I will always work to uphold:

- a) The right to be informed about my collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact me to find out more or to ask any questions using the details in Part 15.
- b) The right to access the personal data I hold about you. Part 13 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by me is inaccurate or incomplete. Please contact me using the details in Part 15 to find out more.
- d) The right to be forgotten, i.e. the right to ask me to delete or otherwise dispose of any of your personal data that I hold. Please contact me using the details in Part 15 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to me using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if I am relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to me directly, I am using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask me for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. I do not use your personal data in this way.

For more information about my use of your personal data or exercising your rights as outlined above, please contact me using the details provided in Part 15.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data I hold about you changes, please keep me informed as long as I have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about my use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. I would welcome the opportunity to resolve your concerns myself, however, so please contact me first, using the details in Part 15.

6. **What Data Do You Collect and How?**

Depending upon your use of My Site, I may collect and hold some or all of the

personal and non-personal data set out in the table below, using the methods also set out in the table. Please also see Part 14 for more information about my use of Cookies and similar technologies. I do not collect any 'special category' or 'sensitive' personal data **or** personal data relating to children **or** data relating to criminal convictions and/or offences.

Data Collected	How I Collect the Data
Identity Information including name, year of birth.	Emails, phone conversations, txt messages, letters.
Contact information including address, email address and telephone number.	Emails, phone conversations, txt messages, letters.
Business information including business name, job title.	Emails, phone conversations, txt messages, letters.
Payment information including card details, bank account numbers.	Phone conversations or in person.

7. **How Do You Use My Personal Data?**

Under the Data Protection Legislation, I must always have a lawful basis for using personal data. The following table describes how I may use your personal data, and my lawful bases for doing so:

What I Do	What Data I Use	My Lawful Basis
Providing and managing your Account.	Identity Information. Contact Information. Business Information. Payment Information	Necessary to provide services.
Administering my business.	Identity Information. Contact Information. Business Information. Payment Information.	Necessary to provide services.
Supplying my products or services to you.	Identity Information. Contact Information. Business Information. Payment Information.	Necessary to provide services.
Managing payments for my products and services.	Identity Information. Contact Information. Business Information. Payment Information.	Necessary to provide services.
Personalising and tailoring my products and services for you.	Identity Information. Contact Information. Business Information.	Necessary to provide services.
Communicating with you.	Identity Information. Contact Information.	Necessary to provide services.

	Business Information.	
Supplying you with information by email or post that you have opted-in-to (you may opt-out at any time by contacting me.	Identity Information. Contact Information. Business Information.	Necessary to provide services.

With your permission and/or where permitted by law, I may also use your personal data for marketing purposes, which may include contacting you by email / telephone / text message / post with information, news, and offers on my products and services. You will not be sent any unlawful marketing or spam. I will always work to fully protect your rights and comply with my obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. I will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

Third Parties whose content appears on My Site may use third-party Cookies, as detailed below in Part 14. Please refer to Part 14 for more information on controlling cookies. Please note that I do not control the activities of such third parties, nor the data that they collect and use themselves, and I advise you to check the privacy policies of any such third parties.

I will only use your personal data for the purpose(s) for which it was originally collected unless I reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If I do use your personal data in this way and you wish me to explain how the new purpose is compatible with the original, please contact me using the details in Part 15.

If I need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, I will inform you and explain the legal basis which allows me to do so.

In some circumstances, where permitted or required by law, I may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

8. How Long Will You Keep My Personal Data?

I will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long I Keep It
Identity Information including name, year of birth.	1 year from collection, to allow for enquiries and investigations to be made.
Contact information including address, email address and telephone number.	1 year from collection, to allow for enquiries and investigations to be made.
Business information including business name, job title.	1 year from collection, to allow for enquiries and investigations to be made.

Payment information including card details, bank account numbers.	Until payment has been collected.
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9. **How and Where Do You Store or Transfer My Personal Data?**

I will only store or transfer your personal data within the UK. This means that it will be fully protected under the Data Protection Legislation.

The security of your personal data is essential to me, and to protect your data, I take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where I am legally required to do so;
- When personal data is stored electronically, the devices will be password, anti-virus and internet security protected.
- When personal data is on paper / diary, this will be stored away in a locked filing cabinet when not in use.

10. **Do You Share My Personal Data?**

I will not share any of your personal data with any third parties for any purposes, subject to the following exceptions.

If I sell, transfer, or merge parts of my business or assets, your personal data may be transferred to a third party. Any new owner of my business may continue to use your personal data in the same way(s) that I have used it, as specified in this Privacy Policy.

In some limited circumstances, I may be legally required to share certain personal data, which might include yours, if I am involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

11. **How Can I Control My Personal Data?**

11.1 In addition to your rights under the Data Protection Legislation, set out in Part 5, when you submit personal data via My Site, you may be given options to restrict my use of your personal data. In particular, I aim to give you strong controls on my use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from me which you may do by unsubscribing using the links provided in my emails and at the point of providing your details and by managing your Account).

11.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have

consented to receiving.

12. **Can I Withhold Information?**

You may access certain areas of My Site without providing any personal data at all. However, to use all features and functions available on My Site you may be required to submit or allow for the collection of certain data.

You may restrict my use of Cookies. For more information, see Part 14.

13. **How Can I Access My Personal Data?**

If you want to know what personal data I have about you, you can ask me for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email shown in Part 15.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover my administrative costs in responding.

I will respond to your subject access request within 28 days and, in any case, not more than one month of receiving it. Normally, I aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date I receive your request. You will be kept fully informed of my progress.

14. **How Do You Use Cookies?**

I have not knowingly placed first-party cookies on your computer or device.

I have also not added any analytics services.

The following providers are used and may use third – party cookies, please look at their relevant policies.

Heart Internet – Website Hosting, <https://www.heartinternet.uk/terms/heart-internet-privacy-statement>.

Paypal – Secure payment, <https://www.paypal.com/uk/webapps/mpp/ua/privacy-full>

Square – Secure payment, <https://squareup.com/gb/en/legal/general/privacy>

Google mail – email, <https://policies.google.com/privacy>

Facebook - communication, <https://en-gb.facebook.com/policy.php>

WB business - messaging service, <https://faq.whatsapp.com/general/security-and-privacy/end-to-end-encryption-for-business-messages/?lang=en>

In addition to the controls that I provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult

the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

15. **How Do I Contact You?**

To contact me about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Mrs S Foster):

Email address: enquiries@sue-phlebotomist.uk.

Telephone number: 07585149476.

16. **Changes to this Privacy Policy**

I may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if I change my business in a way that affects personal data protection.

Any changes will be immediately posted on My Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of My Site following the alterations. I recommend that you check this page regularly to keep up-to-date. This Privacy Policy was last updated on September 2020.