

## Privacy Policy

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal information. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal information about you. When we do so we are subject to the General Data Protection Regulation, which applies across the European Union (including in the United Kingdom) and we are responsible as 'controller' of that personal information for the purposes of those laws.

### Key terms

It would be helpful to start by explaining some key terms used in this policy:

We, us, our	Masaj Limited, registered office at 228a Bethnal Green Road, London, E2 OAA
Personal information	Any information relating to an identified or identifiable individual
Special category personal information	Personal information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership Genetic and biometric data Data concerning health, sex life or sexual orientation

### Personal information we collect about you

We may collect and use the following personal information about you:

- your name and contact information, including email address, telephone number, date of birth, forwarding address and company information (where applicable).
- your billing information, transaction and payment card information.
- medical history, allergies and lifestyle choices on our client consultation form for customers having a treatment done.
- Details of any feedback you give us by phone, email, post or via social media.
- Information about how you use our website, IT, communication and other systems.

This personal information is required to provide our services to you. If you do not provide personal information we ask for, it may delay or prevent us from providing our services to you.

## How your personal information is collected

We collect most of this personal information directly from you for example when you register with us, contact us, send us feedback, purchase goods or book a massage treatment, client consultation forms and customer surveys which may be collected face to face, by telephone, text or email. However, we may also collect information:

- Indirectly such as your browsing activity while on our website,
- from a third party with your consent
- via our IT systems, eg:
  - automated monitoring of our websites and other technical systems, such as our computer networks and connections, communications systems and email

## How and why we use your personal information

Under data protection law, we can only use your personal information if we have a proper reason for doing so, eg:

- to comply with our legal and regulatory obligations;
- for the performance of our contract with you or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party; or
- where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal information for and our reasons for doing so:

What we use your personal information for	Our reasons
To provide goods/and or services to you	For the performance of our contract with you or to take steps at your request before entering into a contract.
If you are a therapist (including prospective) then to evaluate your performance of the services being provided to customers and clients.	For the performance of our contract with you or to take steps at your request before entering into a contract.
Conducting checks to identify our customers and verify their identity	To comply with our legal and regulatory obligations
Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business, eg under health and safety regulation or rules issued by	To comply with our legal and regulatory obligations

What we use your personal information for our professional regulator	Our reasons
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, eg policies covering security and internet use	For our legitimate interests or those of a third party, ie to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party, ie to be as efficient as we can so we can deliver the best service for you at the best price
Ensuring the confidentiality of commercially sensitive information	For our legitimate interests or those of a third party, ie to protect trade secrets and other commercially valuable information  To comply with our legal and regulatory obligations
Statistical analysis to help us manage our business, eg in relation to our financial performance, customer base, product range or other efficiency measures	For our legitimate interests or those of a third party, ie to be as efficient as we can so we can deliver the best service for you at the best price
Preventing unauthorised access and modifications to systems	For our legitimate interests or those of a third party, ie to prevent and detect criminal activity that could be damaging for us and for you  To comply with our legal and regulatory obligations
Updating and enhancing customer records	For the performance of our contract with you or to take steps at your request before entering into a contract  To comply with our legal and regulatory obligations  For our legitimate interests or those of a third party, eg making sure that we can keep in touch with our customers about existing and new orders of goods and/or

What we use your personal information for	Our reasons
Statutory returns	services To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	To comply with our legal and regulatory obligations  For our legitimate interests or those of a third party, eg to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you
Marketing our services to: -existing and former customers; -third parties who have previously expressed an interest in our services; -third parties with whom we have had no previous dealings.	For our legitimate interests or those of a third party, ie to promote our business to existing and former customers and clients
External audits and quality checks, eg for ISO or Investors in People accreditation and the audit of our accounts	For our legitimate interests or a those of a third party, ie to maintain our accreditations so we can demonstrate we operate at the highest standards  To comply with our legal and regulatory obligations

The above table does not apply to special category personal information, which we will only process with your explicit consent by way of a client consultation form.

## Promotional communications

We may use your personal information to send you updates (by email, text message, telephone or post) about our services, including exclusive offers, promotions or new services.

We have a legitimate interest in processing your personal information for promotional purposes (see above 'How and why we use your personal information'). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal information with the utmost respect and never share it with other organisations for marketing purposes.

You have the right to opt out of receiving promotional communications at any time by contacting us at scarlet@masaj.me.

We may ask you to confirm or update your marketing preferences if you instruct us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

## Who we share your personal information with

We routinely share personal information with:

- our self-employed therapists who carry out the therapy treatments,
- payment service providers,
- other third parties we use to help us run our business, eg marketing agencies or website hosts;
- our insurers;
- delivery companies i.e. for the delivery of goods purchased on our website
- our health and safety advisors if you have an accident

We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers relating to ensure they can only use your personal information to provide services to us and to you. We may also share personal information with external auditors, eg in relation to accreditation and the audit of our accounts.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a restructuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

We will not share your personal information with any other third party.

## Where your personal information is held

Information may be held at our offices either in hardcopy form or on our computer database systems and those of our third party agencies, service providers, representatives and agents as described above (see above: 'Who we share your personal information with').

## Links to other websites

When you click links on our website, they may direct you away from our website. We are not responsible for the privacy policy of other websites and would recommend you read their privacy and cookies policy before you submit any personal data to these websites.

## How long your personal information will be kept

We will keep your personal information while you have an account with us or we are providing services to you. Thereafter, we will keep your personal information for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly;
- to keep records required by law.

We will not retain your personal information for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of personal information.

- By law we are required to hold the personal information you have given us in connection with booking a treatment and any notes about those treatments for a minimum of 6 years.
- 6 years after your last treatment or after the end of our business relationship with you we will permanently delete all your personal information that we hold.

When it is no longer necessary to retain your personal information, we will delete or anonymise it.

## Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal information (the right of access)
Rectification	The right to require us to correct any mistakes in your personal information
To be forgotten	The right to require us to delete your personal information-in certain situations
Restriction of processing	The right to require us to restrict processing of your personal information-in certain circumstances, eg if you contest the accuracy of the data
Data portability	The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party-in certain situations
To object	The right to object: -at any time to your personal information being processed for direct marketing (including profiling); -in certain other situations to our continued processing of your personal information, eg

processing carried out for the purpose of our legitimate interests.

Not to be subject to automated decision-making  
The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the General Data Protection Regulation.

If you would like to exercise any of those rights, please:

- email, call or write to us -see below: 'How to contact us'; and
- let us have enough information to identify you (*eg your full name, address and customer or matter reference number*);
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know what right you want to exercise and the information to which your request relates.

## Keeping your personal information secure

We have appropriate security measures to prevent personal information from being accidentally lost, or used or accessed unlawfully. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

## How to complain

We hope that we can resolve any query or concern you may raise about our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

## Changes to this privacy policy

This privacy notice was published on June 2018.

We may change this privacy notice from time to time-when we do we will inform you via our website or by email.

## How to contact us

Please contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

Our contact details

Address: Masaj Limited registered office at 228a Bethnal Green Road,  
London, E2 0AA

Email: [scarlet@masaj.me](mailto:scarlet@masaj.me)

Telephone: +447946317326