

## Data Protection Notice for Users of Raburski Massage

### Who are we?

Daniel Raburski T/A Raburski Massage is an ITEC\* trained Body Works Massage Therapist.

Raburski Massage operates as a sole trader specialising in Holistic Body Massage, Sports Massage (level 5) and Swedish Relaxation Massage on location in South Dublin or by providing a call out service to your place of work or living.

This notice sets out the basis on which any personal data we collect from you, or from others, will be processed by us. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

For the purpose of the Data Protection Acts 1988 and 2003 (as amended) and from 25 May 2018, the General Data Protection Regulation (the GDPR) (the Acts), the data controller is Daniel Raburski.

Our Data Protection Officer is Daniel Raburski: [daniel@raburskimassage.com](mailto:daniel@raburskimassage.com)

*\*ITEC provides leading international qualifications, specialising in Beauty & Spa Therapy, Hairdressing, Complementary Therapies, Sports & Fitness Training and Customer Service. (Source: [www.itecworld.co.uk](http://www.itecworld.co.uk))*

### What personal information do we collect from you?

We may collect a range of personal information from you, depending on your circumstances and the services you require. You may give us personal data by:

- Visiting our website, through the use of Google advertising cookies, and Facebook Advertising and Remarketing Pixel. Statistical information collected includes demographic and user interests.
- Making a booking online through Fresha.com, the Raburski Massage website or Raburski Massage social media channels, which all use a customer management system (CMS) called Fresha, formerly known as Schedul..
- Signing up to receive our newsletters, periodicals, updates or similar.
- Completing a survey in relation to our services or similar.
- Contacting us using a social media channel, such as Facebook, Google, Twitter or similar. (If you wish to contact us using social media, please consult the privacy policy of the social media service provider for details on their privacy practices.)
- Corresponding with us by phone, email or otherwise. We ask you to disclose only as much information as is necessary to submit a question, suggestion, make an appointment or comment in relation to our services.
- Making a complaint about the services provided.

- Attending on site at the therapy room of Raburski Massage, where CCTV (Closed Circuit Television) is in operation. The CCTV is managed and controlled by Elmfield Management Company CLG. The full Elmfield CCTV privacy policy is available on request.
- In line with HSE and HSA guidelines and the Irish Government's emergency health measures relating to COVID-19 (Coronavirus), certain information such as your name, contact details and 'temperature-status', in addition to the time and date of your therapy might be shared for the explicit purpose of contact tracing. A statement relating to this will be made on the therapy consultation form. This form asks that a user of Raburski Massage completes in good faith and, as far as is known, honestly for the purpose of obtaining the services of Raburski Massage.

## **What information about you do we obtain from others?**

We may need additional information from your General Practitioner (GP) if you indicate that you have a medical condition that may reduce the therapy options available to you. Additional medical advice may be required to ensure you do not have a condition that would be considered a potential risk to you.

This information is considered sensitive personal data and as such, additional consent will be requested from you to proceed with obtaining this information.

## **Why do we collect this personal information?**

We collect the information in order to provide you with our services.

We may use this information:

- To report on our website and to help us improve our website
- To make a booking for a therapy provided by Raburski Massage
- To utilise the remarking and advertising features provided by Google, Facebook, Instagram, Twitter and Fresha
- To send you newsletters, periodicals, updates or similar
- To provide the therapies in a safe and healthy way and provide complementary health advice to you
- To examine a complaint made in relation to the Raburski Massage by a client or member of the general public
- To conduct statistical analysis and reporting, for training purposes, for quality review purposes and the development of the services provided by Raburski Massage
- To monitor progress of treatments as part of a series of treatments and to ensure the best decisions are made for you, as the client, to achieve the best results.

The legal basis for the processing of your data are:

- That you have provided consent for the processing for the provision of our services

- Processing is necessary for compliance with legal and professional obligations to which Raburski Massage is subject.

From time to time, as mentioned above, we may also collect sensitive or 'special category' data in the provision of our services. The legal basis for the processing of your special category data is:

- That you have provided additional consent for the processing for the provision of our services

## **Who do we share this information with?**

We do not envisage sharing your information with any third parties. The only exception to this is in the possible circumstances listed below. Sharing of information in these exceptional circumstances will only be done so in accordance with Irish and European law.

- If there is a risk of serious harm to you or to another person or to property
- If we are under a duty to disclose or share your information in order to comply with any legal obligation
- If we are required to give evidence in court
- To get legal advice or to defend a legal right
- In the event of a disclosure relating to child abuse

## **How long do we keep hold of your information?**

The time periods for which we retain your information depends on the type of information and the purposes for which we use it. We will keep your information for no longer than is required or permitted. As a guide, information in relation to your becoming a client of Raburski Massage, will be deleted two years after your final therapy.

Information collected through Google Analytics is retained for 26 months following your last registered visit to [www.raburskimassage.com](http://www.raburskimassage.com)

## **Do we transfer your information outside the European Union or European Economic Area?**

Our website use services provided by Google, including Google Custom Search, Google Maps and Google Analytics. Google may store information on servers outside the European Union or European Economic Area.

Google is certified under Privacy Shield.

We have set up the Google Analytics service with enhanced privacy so that Google will not retain your full IP address and does not have permission to share data collected.



You can find Google's Privacy Policy, effective from 25 May 2018, at <https://policies.google.com/privacy/update>.

You can find Google's Privacy Policy, effective prior to 25 May 2018, at <https://policies.google.com/privacy>.

The booking of therapies is done through online cloud-based app owned by Surge Ventures Inc. T/A Schedul.com and Fresha.com. Surge Ventures will do every effort to ensure information is stored and processed within the European Economic Area (EEA) and United Kingdom, but may from time to time process same in the United States of America.

Surge Ventures is certified under Privacy Shield.

You can find Surge's Privacy Policy, effective from 25 May 2018, for Fresha at <https://www.fresha.com/docs/legal-clauses-privacy.pdf> and Schedul at <https://www.schedul.com/privacy.html#keeping-information-safe>

The Raburski Massage website is developed and hosted using the cloud based program called Webflow.

You can find Webflow's Privacy Policy effective from 25 May 2018 at: <https://webflow.com/legal/eu-privacy-policy>

Register365.com is used for website DNS hosting and webmail hosting. Information and data obtained within the EEA will be stored on servers within its borders.

You can find Register365's Privacy Policy at: <https://www.register365.com/info/terms/privacy-policy>

CookieBot.com is used for the purpose of managing the RaburskiMassage.com cookie policy. You can find their privacy policy at: <https://www.cookiebot.com/en/privacy-policy/>

## **What are your rights with respect to your personal data?**

You have the following rights:

- The right to access the personal data we hold about you.
- The right to require us to rectify any inaccurate personal data about you without undue delay.
- The right to have us erase any personal data we hold about you in circumstances such as where it is no longer necessary for us to hold the personal data or, in some circumstances, if you have withdrawn your consent to the processing.
- The right to object to us processing personal data about you such as processing for profiling or direct marketing.
- The right to ask us to provide your personal data to you in a portable format or, where technically feasible, for us to port that personal data to another provider provided it does not result in a disclosure of personal data relating to other people.
- The right to request a restriction of the processing of your personal data.



Where our processing of your personal data is based on your consent to that processing, you have the right to withdraw that consent at any time but any processing that we have carried out before you withdrew your consent remains lawful. The withdrawal of your consent may mean the suspension or cessation of the provision of the services that Raburski Massage has been providing you up until the date of withdrawal of consent on the basis that we are no longer able to provide these services without your personal data.

You may exercise any of the above rights by contacting the data protection contact at any of the contact points listed above.

You may lodge a complaint with your supervisory authority with respect to our processing of your personal data. The supervisory authority in Ireland is the Data Protection Commissioner. The website is [www.dataprotection.ie](http://www.dataprotection.ie).

You may also block Google advertising and remarketing using the web-opt out tool available at the following web address: <https://tools.google.com/dlpage/gaoptout/>

### **What will happen if we change our Data Protection Notice?**

This notice may change from time to time, and any changes will be posted on the [www.raburskimassage.com](http://www.raburskimassage.com) website and will be effective when posted.

This notice was last updated on **12 July 2020**.

### **How can you contact us?**

Our Data Protection Officer can be contacted at any of the contact points listed above.

## Version Control

Version	Date	Changes made by	Change Description
<b>V1.0</b>	22 May 2018	Bobby Barbour	First draft.
<b>V2.0</b>	29 July 2018	Bobby Barbour	Updated for Google Analytics changes regarding demographic, interest and advertising cookies
<b>V3.0</b>	31 August 2019	Bobby Barbour	Updated for Facebook Pixel Analytics changes regarding demographic, interest, advertising and remarketing cookies Surge Ventures Inc. T/A Shedul.com and Fresha.com Inclusion of Facebook, Instagram and Twitter for advertising and remarketing analytics Updated reason for the collection of data for the making of complaints
<b>V4.0</b>	12 July 2020	Bobby Barbour	Updated to reflect COVID-19 contact tracing requirements as a result of the HSE, HSA and Irish Governments emergency health measures to control the spread of the virus. Inclusion of Webflow.com for the purposes of website development and hosting, including Register365 for DNS hosting of the <a href="http://www.raburskimassge.com">"www.raburskimassge.com"</a> URL. New Raburski Massage logo included.

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