

Chronic Pain Relief Online Clinic Privacy Notice

1. Introduction

Us

We are **Carole Randell trading as Chronic Pain Relief Online Clinic** and as the data controller we are responsible for looking after your personal data.

You can contact us via this website or by email to carole@chronicpainreliefclinic.online

This privacy notice provides you with details of how we collect and process your personal data through your use of our site <https://www.chronicpainreliefonlineclinic.com>

You

You must be over 13 years of age to provide us with any data.

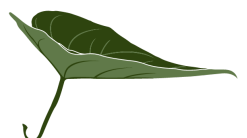
It is very important that the information we hold about you is accurate - please let us know if your personal information changes at any time.

2. What information do we collect and on what grounds do we process it?

Personal data means any information that can be used to identify you, so it does not include anonymised data. We may process the following types of personal data about you:

Communications that you send to us

Whether it be through the contact form on our website, through email, text, social media messaging, social media posting or any other communication that you send us.



We process this data on the grounds of **legitimate interests** - for the purposes of communicating with you, for record keeping and for the establishment, pursuance or defence of legal claims.

Customer Data

Includes data relating to any purchases of goods and/or services such as your name, title, billing address, delivery address email address, phone number, contact details, purchase details and your card details.

We process this on the grounds of **performance of contract** - data to supply the goods and/or services you have purchased and to keep records of such transactions.

User Data

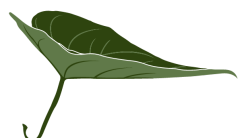
Information about how you use our website and any online services together with any data that you post for publication on our website or through other online services.

We process this on the grounds of **legitimate interests** - to operate our website and ensure relevant content is provided to you, to ensure the security of our website, to maintain back-ups of our website and/or databases and to enable publication and administration of our website, other online services and business.

Technical Data

Information about your use of our website and online services such as your IP address, your login data, details about your browser, length of visit to pages on our website, page views and navigation paths, details about the number of times you use our website, time zone settings and other technology on the devices you use to access our website. The source of this data is from our analytics tracking system.

We process on the grounds of **legitimate interests** - to analyse your use of our website and other online services, to administer and protect our business and website, to deliver relevant website content and advertisements to you and to understand the effectiveness of our advertising, to grow our business and to decide our marketing strategy.



Marketing Data

Information about your preferences in receiving marketing from us and our third parties and your communication preferences.

We process this on the grounds of **legitimate interests** - to enable you to partake in our promotions such as competitions, prize draws and free give-aways, to deliver relevant website content and advertisements to you and measure or understand the effectiveness of this advertising, to study how customers use our products/services, to develop them, to grow our business and to decide our marketing strategy.

We may use any of the above data to deliver relevant website content and advertisements to you (including Facebook adverts or other display advertisements) and to measure or understand the effectiveness of the advertising we serve you. We may also use such data to send other marketing communications to you.

Our lawful ground for this processing is either **consent or legitimate interests** - to grow our business.

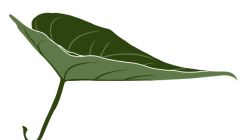
Sensitive Data

Any sensitive information is kept only for treatment, legal and insurance purposes and will not be shared with third parties unless legally required to do so. Our legal ground for processing this data is your **explicit consent**. This data will not be shared or used for marketing purposes.

Where we are required to collect personal data by law, or under the terms of the contract between us and you do not provide us with that data when requested, we may have to cancel a product or service you have ordered but if we do, we will notify you at the time.

We may have to process your personal data without your knowledge or consent where this is required or permitted by law.

We will only use your personal data for the purpose it was collected for or a reasonably compatible purpose if necessary. We do not carry out automated decision making or any type of automated profiling.



3. How we collect your data

We collect data about you when you fill in forms on our site or by sending us emails. We may also automatically collect data from you using cookies and similar technologies. Please see our [Cookie Policy](#) for details.

We may also receive data from third parties such as search engines, analytics providers, advertising networks, technical providers, payment processors and delivery services, such as Google, Facebook, PayPal, Stripe, and others. Many of these are based outside the EU.

4. Marketing Communications

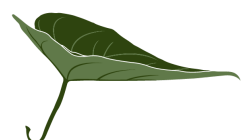
Under our legitimate interests (to grow our business) or with your consent we will use your personal information to send you marketing communications.

Under the Privacy and Electronic Communications Regulations, we may send you marketing communications from us if (i) you made a purchase or asked for information from us about our goods or services or (ii) you agreed to receive marketing communications and in each case you have not opted out of receiving such communications since. Under these regulations, if you are a limited company, we may send you marketing emails without your consent. However you can still opt out of receiving marketing emails from us at any time.

We will not share your personal data with any third party for their own marketing purposes without your express consent.

You can ask us or third parties to stop sending you marketing messages at any time by following the unsubscribe links on any marketing message sent to you or by emailing us at carole@chronicpainreliefclinic.online

If you opt out of receiving marketing communications this opt-out does not apply to personal data provided as a result of other transactions, such as purchases, warranty registrations etc.



5. Disclosures of your personal information

We may have to share your personal information with:

- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers
- Government bodies that require us to report processing activities.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

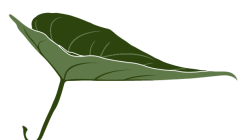
6. International Transfers

Countries outside of the European Economic Area (EEA) do not always offer the same levels of protection to your personal data, so European law has prohibited transfers of personal data outside of the EEA unless the transfer meets certain criteria.

Many of our third parties service providers are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we do our best to ensure a similar degree of security of data by ensuring at least one of the following safeguards is in place:

- We will only transfer your personal data to countries that the European Commission have approved as providing an adequate level of protection for personal data by; or
- Where we use certain service providers, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe; or
- If we use US-based providers that are part of EU-US Privacy Shield, we may transfer data to them, as they have equivalent safeguards in place.



If none of the above safeguards is available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

7. Data Security

We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. We also allow access to your personal data only to those employees and partners who have a business need to know such data. They will only process your personal data on our instructions and they must keep it confidential.

8. Data Retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

9. Your Legal Rights

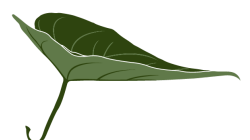
Under data protection laws you have rights in relation to your personal data that include: the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please email us at carole@chronicpainreliefclinic.online

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive or refuse to comply with your request in these circumstances.



We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

10. Third Party Links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

11. Cookies

You can use settings in your browser to control, disable or refuse cookies, although this may cause some parts of this website to become inaccessible or function incorrectly. For more information, see our [Cookie Policy](#).

