

**Privacy Policy**

**Scope**

This document sets out Kinetic Ability’s policy regarding privacy and security of personal data.

Personal data is defined as information concerning any living person (a natural person who hereafter will be called the Data Subject) that is not already in the public domain.

Kinetic Ability take your privacy very seriously and we want you to be sure that we make every effort to protect your personal data in compliance with the General Data Protection Regulation (GDPR) which is EU wide and far more extensive than its predecessor the Data Protection Act, along with the Privacy and Electronic Communications Regulations (PECR), seek to protect and enhance the rights of EU data subjects.

These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU and its storage within the EEA.

**Policy Overview**

We collect personal information from our clients, and by “opting in” to share your personal information with us, you will be agreeing to our collection and use of your information as described in this policy.

If you no longer want us to process your personal details, you can ask us to stop at any time by contacting camille@kineticability.co.uk

Why does Kinetic Ability collect your personal Data?

* Make sure you receive a safe and appropriate treatment for your presented condition/complaint.
* Make sure that you do not present with medical contraindications for your requested service.
* Make sure you receive the product, service or information you have requested.
* Carry out reasonable administration of your details and keep internal records.
* To keep in touch with you in the way that you have requested.

What information does Kinetic Ability collect?

Basic personal data may be collected about you from the marketing forms and surveys you complete, from records of our correspondence and phone calls and details of your visits to our website, including but not limited to, personally identifying information like:

* Name and Surname
* Date of birth
* Gender
* Contact information such as email addresses and telephone numbers
* Demographic information such as post code, preferences and interests
* Internet Protocol (IP) addresses
* Details of services and products used
* Medical information (Such as past medical history, medications, treatment.)

Kinetic Ability’s website uses cookies, which is a string of information that a website stores on a visitor’s computer, and that the visitor’s browser provides to the website each time the visitor returns. Kineticability.co.uk uses cookies to help Kinetic Ability to identify and track visitors and their website access preferences.

Kinetic Ability’ website visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using Kinetic Ability’ website.

**What we do with your information**

Processing

We will make sure that you receive the service you have requested, process any payments and send you information relating to that service. We will also do our best to keep your information up to date. This includes monitoring returned mail to let us know if you no longer live at the address we hold for you. Please do let us know if your details have changed or need updating.

Marketing

Receiving marketing information from Kinetic Ability will always be your choice. You can change your mind at any time and we will keep your preferences up to date. We limit the number of marketing communications we send to make sure we are not sending you too much but we will try and send you sufficient information so that you do not miss relevant news.

We will only contact you for marketing purposes by telephone, text message (SMS and/or WhatsApp) or email if you have told us we can. We will only contact you by email if you have told us you would like to hear from us this way.

**Who will have access to my information?**

Your information will only be accessible to our staff or contractors if they are trained and it is appropriate, in order for them to carry out their role in line with their job role and this Privacy Policy.

We will never sell your personal information, or let other organisations use it for their own purposes.

All patient’s medical notes are password protected and are only accessible by trained staff involved in your treatment. To be able to process your personal data it is a condition of any treatment that you give your explicit consent to allow Kinetic Ability to document and process your personal medical data.

We will only share your personal information where:

* We are legally required to, or as a result of a lawful request by a government or law enforcement authority.
* Any data used by a contractor will be used only to the extent required by them to perform the services that Kinetic Ability requests. Any use for other purposes is strictly prohibited.
* Our Patient Data is stored within Drobox (based online). This is secure and encrypted and governed by their data protection policy accessible via: <https://www.dropbox.com/en_GB/privacy>.
* Limited data (name, surname, date of birth and email address) may be shared with Physitrack as part of your treatment plan in order for you to access your exercise prescription. Physitrack is GDPR compliant and their Privacy Policy are accessible in the following link: <https://www.physitrack.com/privacy>

With your consent your data may be shared with your doctor, occupational health department or insurer.

Our website may contain links to other websites that are outside our control and are not covered by this Privacy Policy. If you access other sites using the links provided, the operators of these sites may collect information from you that will be used by them in accordance with their privacy policy, which may differ from ours.

**How do we keep your information safe?**

Our networks are regularly monitored to ensure they remain secure and all computers and tablets used by Kinetic Ability are password protected.

Data that is transmitted via the internet or in email, cannot be 100% secure.

We will take every reasonable precaution to keep your information safe, but it cannot be guaranteed, so please be aware that any information you do transmit to us is at your own risk. Once we have received your information, we will use our best efforts to ensure its safety within our network.

**How long do we keep your information?**

Kinetic Ability will process personal data during the duration of any treatment and will continue to store only the personal data needed for eight years after the contract has expired to meet any legal obligations. After eight years all personal data will be deleted, unless basic information needs to be retained by us to meet our future obligations to you, such as erasure details. Records concerning minors who have received treatment will be retained until the child has reached the age of 25.

**Your rights concerning your Data**

In line with General Data Protection Regulation (GDPR), you have the following rights:

* Right of access: you have the right to request a copy of the information that we hold about you.
Right of rectification: you have a right to correct data that we hold about you that is inaccurate or incomplete.
Right to be forgotten: in certain circumstances you can ask for the data we hold about you to be erased from our records.
* Right to restriction of processing: where certain conditions apply you have a right to restrict the processing.
Right of portability: you have the right to have the data we hold about you transferred to another organisation.
* Right to object: you have the right to object to certain types of processing such as direct marketing. Right to object to automated processing, including profiling – you also have the right not to be subject to the legal effects of automated processing or profiling.

**Access to your Data**

A minimum of one piece of photographic ID listed below and a supporting document is required.

Kinetic Ability will accept the following forms of identification (ID) when information on your personal data is requested: a copy of your driving license, passport, birth certificate and a utility bill not older than three months.

If you would like to make a subject access request, you can do so by contacting us at:

camille@kineticability.co.uk

You also have the right to request that your data be deleted from our records at any time. If you would like to make such a request, you can do so by contacting us at:

Camille@kineticability.co.uk

**Complaints**

In the event that you wish to make a complaint about how your personal data is being processed by Kinetic Ability, you have the right to complain to us. If you do not get a response within 30 days, you can complain to the Information Commissioner’s Office.

The details for each of these contacts are:
Camille Rouxel

camille@kineticability.co.uk

You can contact the ICO via their website: [www.ico.org.uk](http://www.ico.org.uk) should you wish to make a complaint about the way we are processing your personal data.

Kinetic Ability reserves the right to change this Privacy Policy as we may deem necessary or as may be required in law. We will always provide you with the latest information about what is happening to your personal information.