

## **Privacy Policy**

### **Soul 2 Sole Reflexology Academy**

*Effective Date: 16<sup>th</sup> May 2025*

At **Soul 2 Sole Reflexology Academy** (“we”, “us”, “our”), we are committed to protecting your personal data and respecting your privacy. This policy explains how we collect, use, and protect your personal information in compliance with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**. It applies to both our **training programmes** and **reflexology therapy services**.

#### **1. Who We Are:**

**Soul 2 Sole Reflexology Academy** provides reflexology training courses and professional reflexology treatments.

**Data Controller:** Soul 2 Sole Reflexology Academy

**Responsible Person for Data Protection:** Lavinia Harper

Email: [soul2sole.eastmids@gmail.com](mailto:soul2sole.eastmids@gmail.com)

Address: The Old Clerk’s Office, Carnegie Civic & Community Centre, Warren Ave, Stapleford, NG9 8EY

Phone: 07903 696926

#### **2. What Personal Data We Collect:**

We may collect the following personal data:

##### **A. Students (Training Services):**

- Identity Data: name, date of birth, gender, nationality.
- Contact Data: address, phone number, email address.
- Education/Professional Info: qualifications, assessments, certificates.
- Payment Data: billing and payment history.
- Communications: course-related emails and feedback.

##### **B. Clients (Therapy Services):**

- Identity Data: name, date of birth, contact details.
- Health Data: relevant medical history, health conditions, medications, lifestyle factors (with your explicit consent).
- Appointment Data: treatment history, notes, preferences.
- Payment Data: payment method and receipts.
- Communication History: enquiries, bookings, follow-up notes.

### **3. Lawful Basis for Processing:**

We process your personal data based on the following legal grounds:

<b>Purpose</b>	<b>Legal Basis</b>
Course registration, certification	Contractual necessity
Therapy appointments and treatment records	Consent & legitimate interests
Medical data (for therapies)	Explicit consent
Financial records and invoicing	Legal obligation
Marketing communications	Consent
Service improvement and internal records	Legitimate interests

### **4. How We Use Your Data:**

We use your personal data to:

- Register you for courses and manage your progress.
- Provide reflexology treatments tailored to your health needs.
- Maintain accurate treatment or training records.
- Communicate with you regarding services, appointments, or learning materials.
- Process payments and issue invoices.
- Send updates or marketing communications (with your permission).
- Comply with legal, regulatory, and insurance obligations.

### **5. Sharing Your Data:**

We do **not** sell your data. We may share it only with trusted third parties when necessary. This may include the following:

- Accrediting bodies (for issuing qualifications).
- Healthcare professionals (with your explicit consent and if relevant).
- Payment processors (SumUp etc.).
- IT and system providers (for secure hosting and email services).
- HMRC or regulators (if legally required).

Any third-party service provider is contractually bound to comply with data protection laws.

#### **6. International Data Transfers:**

We aim to keep your data within the UK. If any data is transferred outside the UK (e.g., via cloud-based services), we ensure appropriate safeguards such as **International Data Transfer Agreements (IDTAs)** or equivalent protections are in place.

#### **7. Data Retention:**

We retain your data for only as long as necessary for legal, contractual, and service-related purposes:

- Student/course records: 7 years after final course activity.
- Client therapy records: 7 years after the last treatment (or age 25 for minors, whichever is later, per insurance requirements).
- Financial records: 6 years (per HMRC rules).
- Marketing consent data: until you withdraw your consent.

#### **8. Your Rights:**

Under the UK GDPR, you have the right to:

- Access your personal data.
- Correct inaccurate or incomplete data.
- Request erasure (“right to be forgotten”) in some cases.
- Restrict or object to certain types of processing.
- Withdraw consent at any time (e.g., for marketing or health records).
- Request data portability (where applicable).

To exercise any of these rights, contact **Lavinia Harper** at [Insert DPO Email].

You may also lodge a complaint with the **Information Commissioner’s Office (ICO)** at <https://ico.org.uk>.

#### **9. Data Security:**

We take appropriate measures to secure your data, including:

- Encrypted systems and secure storage for electronic and paper records.
- Access restricted to authorised personnel only.

- Regular backups and password protection.
  - Training for staff in data privacy and confidentiality.
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#### **10. Cookies & Website Analytics:**

Our website may use cookies to improve user experience and analyse site traffic. You can control cookie preferences in your browser. For more detail, refer to our [Cookie Policy].

#### **11. Updates to This Policy:**

We may update this policy from time to time. Any changes will be posted on our website, with the updated effective date at the top.

#### **12. Contact Us:**

If you have any questions, concerns, or wish to exercise your rights, please contact:

**Lavinia Harper**

Data Protection Contact

Email: [soul2sole.eastmids@gmail.com](mailto:soul2sole.eastmids@gmail.com)

Phone: 07903 696926