

# Holistic Harmony

12a Laburnum Terrace, Ashington, Northumberland, NE630XX  
01670 810003 [holisticharmony@msn.com](mailto:holisticharmony@msn.com)

This privacy notice provides you with details of how we collect and process your personal data through your use of our website including any information you may provide through our site when you purchase a product or service, sign up to our newsletter or take part in a prize draw or competition.

This website is not intended for children and we do not knowingly collect data relating to children.

You must read this privacy notice together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

## Data Controller

Holistic Harmony is the data controller, our contact details are

Holistic Harmony

12a Laburnum Terrace

Ashington

Northumberland

NE630XX

Tel: 01670 810003

Email: [holisticharmony@msn.com](mailto:holisticharmony@msn.com).

## Third-party links outside of our control

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.

## The personal data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. You can find out more about personal data from the [Information Commissioners Office](#).

We may process different kinds of personal data about you as follows:

**Identity Data** includes first name/last name/ username/marital status/ title/date of birth/gender

**Contact Data** includes billing address/delivery address/email address/ telephone numbers.

**Financial Data** may include your bank account and card details.

**Transaction Data** may include details about payments between us and details of purchases made by you.

**Profile Data** may include your username, purchases or orders, your interests, preferences, feedback and survey responses.

**Usage Data** may include information about how you use our website, products and services.

**Marketing and Communications Data** may include your preferences in receiving marketing communications from us and your communication preferences.

We may also process **aggregated data** such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

## Sensitive Data

We do not collect sensitive personal data (such as racial or ethnic origin, nationality, political opinions, religious beliefs, etc) on this website. In order to tailor product offers to your circumstances we may ask for information such as your age or any disability that you may have. As with all data, it is entirely up to you to decide whether or not you are happy to provide this information. Sensitive personal data will only be used in order for us to fulfil our contract with you to provide the services that you have requested. We may use data provided by you to serve you better and meet your particular needs (for example, the provision of disability access).

We need to collect the following sensitive data about you in order to perform complementary therapies and to ensure that your needs are met at events.

**Health Information** - may include data provided by you in a self-assessment questionnaire regarding your general health, details of medical conditions, medications and previous surgery etc. We require your explicit consent for processing sensitive data, so when you submit your details, we will ask for your consent to this processing. 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 not be able to perform the contract (for example, to deliver goods or services to you). If you don't provide us with the requested data, we may have to cancel a product or service you have ordered but if we do, we will notify you at the time.

**How we collect your personal data**

We use different methods to collect data from and about you including:

**Directly:** You may provide data by filling in forms on our site (or otherwise) or by communicating with us by post, phone, email or otherwise, including when you:

- Order/book our products or services;
- Subscribe to our service or publications;
- Request resources or marketing be sent to you;
- Enter a competition, prize draw, promotion or survey; or
- Give us feedback;

**Third parties or publicly available sources:** We may receive personal data about you from various third parties and public sources as set out below:

- We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation, or if we're under a duty to disclose or share your personal data in order to comply with any legal obligation or to enforce or apply our terms of use or to protect the rights, property or safety of our supporters and customers. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.
- Analytics providers such as Google based outside the EU,
- Advertising networks such as Facebook based outside the EU,
- Search information providers such as Google based outside the EU.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Paypal based outside the EU, Guestline Limited Property Management Solution based inside the EU.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

**How we use your personal data**

We will only use your personal data when legally permitted. The most common uses of your personal data are:

- Where we need to perform the contract between us for example, to administer a booking, event or reservation;
- Send you emails or call you in relation to your booking;
- If attending an event, provide you with dietary specific meals when you book a meal / dine with us by collecting information regarding your dietary requirements
- Other communications for example responding to requests or general customer service
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal ground for processing your personal data, other than in relation to sending marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by emailing us at [holisticharmony@msn.com](mailto:holisticharmony@msn.com)

**Purposes for processing your personal data**

Set out below is a description of the ways we intend to use your personal data and the legal grounds on which we will process such data. We have also explained what our legitimate interests are where relevant.

We may process your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data. Please email us at [holisticharmony@msn.com](mailto:holisticharmony@msn.com) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

**Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, with the legal bases we rely on to do so.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us at Holistic Harmony if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
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To register you as a new customer	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> </ul>
To complete consultation/booking forms relevant to providing services	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Health, lifestyle and general wellbeing information</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary to comply with legal and insurance obligations of providing a service</li> <li>• Necessary for our legitimate interest and to keep our records updated</li> <li>• Necessary to protect the interests of data subject</li> </ul>
To process and deliver your order including: <ul style="list-style-type: none"> <li>• Manage payments, fees and charges</li> <li>• Collect and recover money owed to us</li> </ul>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Financial</li> <li>• Transaction</li> </ul>	<ul style="list-style-type: none"> <li>• performance of a contract with you</li> <li>• necessary for our legitimate interests (to recover debts due to us)</li> </ul>
To manage our relationship with you which includes: <ul style="list-style-type: none"> <li>• notifying you about changes to our terms or privacy policy</li> <li>• asking you to leave a review or take a survey</li> <li>• making appointments etc</li> <li>• to enable you to take part in a prize draw, competition or compete a survey.</li> </ul>	<ul style="list-style-type: none"> <li>• identity</li> <li>• contact</li> <li>• profile</li> <li>• marketing and communications</li> <li>• usage</li> </ul>	<ul style="list-style-type: none"> <li>• performance of a contract with you</li> <li>• necessary to comply with a legal obligation</li> <li>• necessary for our legitimate interests (to keep our records updated and to study how customers use our products and services)</li> </ul>
To administer and protect our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"> <li>• identity</li> <li>• contact</li> <li>• technical</li> </ul>	<ul style="list-style-type: none"> <li>• necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</li> <li>• necessary to comply with a legal obligation</li> </ul>
To make suggestions and recommendations to you about goods or services that may be of interest to you	<ul style="list-style-type: none"> <li>• identity</li> <li>• contact</li> <li>• technical</li> <li>• usage</li> <li>• profile</li> </ul>	<ul style="list-style-type: none"> <li>• necessary for our legitimate interests (to develop our products and services and grow our business)</li> </ul>

### **Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### **Promotional offers from us**

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

### **Third-party marketing**

We will get your express opt-in consent before we share your personal data with any company outside Holistic Harmony for marketing purposes.

### **Opting out**

You can ask us to stop sending you marketing messages at any time by unchecking relevant boxes on emails to adjust your marketing preferences or by following the unsubscribe links attached to mailing list emails or by contacting Holistic Harmony directly on [holisticharmony@msn.com](mailto:holisticharmony@msn.com). Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service/purchase or other transactions.

### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact Holistic Harmony. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **Who we share your personal data with**

We may have to share your personal data with the parties set out below for the purposes set out in the table in above.

- Internal Third Parties, Holistic Harmony Staff/Partners
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law.

We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **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.

Some 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. For example we use MailChimp for sending marketing emails; the Mailchimp servers are based in the United States.

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 implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission; 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
- Where we use providers based in the United States, we may transfer data to them if they are part of the EU-US Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

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.

Please email us at [holisticharmony@msn.com](mailto:holisticharmony@msn.com) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

Holistic Harmony also may also use various social media Platforms and other websites to conduct business, all of these websites have their own privacy policies which we encourage you to read. Platforms and sites such as (may include more in the future):

- [Msn](#)
- [Google](#).
- [Paypal](#)
- [Ebay](#)
- [Mailchimp](#)
- [Twitter](#)
- [Instagram](#)
- [Facebook](#)

### **Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

### **Data retention**

By law we have to keep information about our customers (including contact, identity, financial and transaction data) for six years after they cease being customers for tax/legal purposes.

Emails on our mailing list are kept indefinitely.

In some circumstances you can ask us to delete your data: see **Your legal rights** below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

### **Your legal rights**

Unless subject to an exemption under the data protection laws, you have the following rights with respect to your personal data;

- To request a copy of your personal data.
- To request that we correct any personal data.
- To request your personal data is erased where it is no longer necessary to retain such data.
- To withdraw your consent to the processing at any time, where consent was the lawful basis for processing your data.
- To request that we provide you with your personal data and where possible, to transmit that data directly to another data controller.
- Where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing.
- 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 contact Holistic Harmony on [holisticharmony@msn.com](mailto:holisticharmony@msn.com). 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 admin fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may 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 and keep you updated.

### **Queries, requests or concerns**

To exercise all relevant rights, queries or complaints in relation to this policy or any other data protection matter between you and us, please in the first instance contact Holistic Harmony on [holisticharmony@msn.com](mailto:holisticharmony@msn.com).

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](#) on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England, UK.