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## PRIVACY POLICY

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### BACKGROUND:

Work Better Wellbeing understands that your privacy is important to you and that you care about how your personal data is used. I respect and value the privacy of everyone who visits this website, [www.workbetterwellbeing.co.uk](http://www.workbetterwellbeing.co.uk) (My Site") and only collect and use your personal data as described in this Privacy Policy. Any personal data I collect will only be used as permitted by law.

Please read this Privacy Policy carefully and ensure that you understand it.

#### 1. Information About Me

My Site is owned and operated by Work Better Wellbeing, a Sole Trader.

Address: 22 Hermiston, Edinburgh EH14 4AQ

Data Protection Officer: Sarah Shimmen

Email address: [sarah@workbetterwellbeing.co.uk](mailto:sarah@workbetterwellbeing.co.uk)

Telephone number: 0131 449 9133.

Postal address: 22 Hermiston, Edinburgh EH14 4AQ

#### 2. What Does This Policy Cover?

This Privacy Policy applies only to your use of My Site. My Site may contain links to other websites. Please note that I have no control over how your data is collected, stored, or used by other websites and I advise you to check the privacy policies of any such websites before providing any data to them.

#### 3. What Is Personal Data?

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

#### 4. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which I will always work to uphold:

- a) The right to be informed about My collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact me to find out more or to ask any questions using the details in Part 10.
- b) The right to access the personal data we hold about you. Part 9 will tell you how to do this.

- c) The right to have your personal data rectified if any of your personal data held by me is inaccurate or incomplete. Please contact me using the details in Part 10 to find out more.
- d) The right to be forgotten, i.e. the right to ask me to delete or otherwise dispose of any of your personal data that I hold. Please contact me using the details in Part 10 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to me using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if I am relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to me directly, I am using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask me for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. I do not use your personal data in this way.

For more information about My use of your personal data or exercising your rights as outlined above, please contact me using the details provided in Part 10.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep me informed as long as I have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about My use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. I would welcome the opportunity to resolve your concerns myself, however, so please contact me first, using the details in Part 10.

## 5. **What Personal Data Do You Collect and How?**

Subject to the following, I do not collect any personal data from you. I do not place cookies on your computer or device, nor do I use any other means of data collection.

My Site collects certain information automatically, including your IP address, the type of browser you are using, and certain other non-personal data about your computer or device such as your operating system type or version, and display resolution.

If you send me an email, I may collect your name, your email address, and any other information which you choose to give me. For the purposes of the Data Protection Legislation, I am the data controller responsible for such personal data.

The lawful basis under the Data Protection Legislation that allows me to use such information is article 6(1)(f) of the UK GDPR which allows me to process personal data when it is necessary for the purposes of My legitimate interests, in this case, the proper operation and functionality of My Site. If you contact me as described above, you will be required to consent to My use of your personal data to contact you. In this case, My lawful basis for using your personal data will be article 6(1)(a) of the UK GDPR, which allows me to use your personal data with your consent for a particular

purpose or purposes.

## **6. How Do You Use My Personal Data?**

Where I collect any personal data, it will be processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. I will comply with My obligations and safeguard your rights under the Data Protection Legislation at all times. For more details on security see Part 7, below.

As stated above, I do not generally collect any personal data directly from you, but if you contact me and I obtain your personal details from your email, I may use them to respond to your email. The other technical data referred to above is necessary for the technical operation of My Site and will not normally be used in any way to personally identify you.

Any and all emails containing your personal data will be deleted no later than two years after It has been dealt with and no other personal data will be retained for any longer than is necessary.

I will not share any of your personal data with any third parties for any purposes.

## **7. How and Where Do You Store My Data?**

I will only store your personal data in the UK. This means that it will be fully protected under the Data Protection Legislation.

## **8. Do You Share My Personal Data?**

I will not share any of your personal data with any third parties for any purposes, subject to the following exceptions.

I sell, transfer, or merge parts of My business or assets, your personal data may be transferred to a third party. Any new owner of My business may continue to use your personal data in the same way that I have used it, as specified in this Privacy Policy (i.e. to communicate with you).

In some limited circumstances, I may be legally required to share certain personal data, which might include yours, if I involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

## **9. How Can I Access My Personal Data?**

If you want to know what personal data I have about you, you can ask me for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 10.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover My administrative costs in responding.

I will respond to your subject access request within (less than one month) and, in any case, not more than one month of receiving it. Normally, I aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up

to a maximum of three months from the date I receive your request. You will be kept fully informed of My progress.

10. **How Do I Contact You?**

To contact me about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Email address: sarah@workbetterwellbeing.co.uk

Telephone number: 0131 449 9133

Postal Address: 22 Hermiston, Edinburgh EH14 4AQ

11. **Changes to this Privacy Policy**

I may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if I change My business in a way that affects personal data protection.

Any changes will be immediately posted on My Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of My Site following the alterations. I recommend that you check this page regularly to keep up-to-date. This Privacy Policy was last updated on 1<sup>st</sup> February 2022.