



Customer Privacy Notice

This privacy notice tells you what to expect us to do with your personal information.

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Contact details

Email: nick.shough@puye.co.uk

What information we collect, use, and why

We collect or use the following information to **provide services and goods, including delivery and third party referrals**:

- Names and contact details
- Gender
- Pronoun preferences
- Addresses
- Date of birth
- Emergency contact details
- Photographs or video recordings
- Service use history
- Health information (including medical conditions, test results, allergies, medical requirements and medical history)
- Records of meetings and decisions
- Information relating to compliments or complaints

We also collect or use the following special category information to **provide services and goods, including delivery and third party referrals**. This information is subject to additional protection due to its sensitive nature:

- Health information

We collect or use the following information to **receive donations or funding and organise fundraising activities**:

- Names and contact details
- Payment or banking details



We collect or use the following personal information for **service updates or marketing purposes**:

- Names and contact details
- Records of consent, where appropriate

We collect or use the following personal information to **comply with legal requirements**:

- Name
- Contact information
- Any other personal information required to comply with legal obligations

We also collect or use the following special category information to **comply with legal requirements**. This information is subject to additional protection due to its sensitive nature:

- Health information

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Address
- Witness statements and contact details
- Information relating to health and safety (including incident investigation details and reports and accident book records)

Lawful bases and data protection rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible [lawful bases](#) in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [Read more about the right of access.](#)
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [Read more about the right to rectification.](#)



- **Your right to erasure** - You have the right to ask us to delete your personal information. [Read more about the right to erasure.](#)
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [Read more about the right to restriction of processing.](#)
- **Your right to object to processing** - You have the right to object to the processing of your personal data. [Read more about the right to object to processing.](#)
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. [Read more about the right to data portability.](#)
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. [Read more about the right to withdraw consent.](#)

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide services and goods, including delivery and third party referrals** are:

- **Consent** - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- **Legal obligation** – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- **Legitimate interests** – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - To provide treatments of auricular acupuncture it is necessary to obtain written consent beforehand, which includes health screening questions to plan treatment. It is necessary to retain these for seven years for insurance purposes. For our mailing list to provide updates and offers, we electronically record name, email address, the service they work for, and when and where we met them.



For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information to **receive donations or funding and organise fundraising activities** are:

- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - As a Community Interest Company we are able to accept donations to support our activities in the community. When we send updates and offers we include a QR code for donations to our Go-Fund-Me page, where payments are managed by the online system, and we are notified including the person’s name and email address, which is all that we store in an email folder.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for **service updates or marketing purposes** are:

- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - We regularly share updates with our mailing list to promote our free weekly drop-in clinic and to inform people of when we are attending community events, or have training courses available. For our mailing list to provide updates and offers, we electronically record name, email address, the service they work for, and when and where we met them.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information to **comply with legal requirements** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.



Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- Recognised legitimate interests - our pre-approved purpose for collecting or using personal information for dealing with queries, complaints or claims:

We need to protect the physical, mental or emotional well-being of people who need extra support, or to protect them from harm or neglect (the 'safeguarding condition').

Where we get personal information from

- Directly from you

How long we keep information

- Consent to treatment forms are retained for seven years to comply with insurance requirements, after such time they are shredded.

How to complain

If you have any concerns about our use of your personal information, you can make a data protection complaint to us:

Email: nick.shough@puye.co.uk

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>