

# Privacy Policy

Your privacy is important to us and we are committed to protecting your personal information. It is Optimus Clinical Consultancy Ltd. (Free To Be Creative) policy to respect your privacy regarding any information we may collect from you in our practice and across our website, [www.freetobecreative.co.uk](http://www.freetobecreative.co.uk)

## 1) How We Collect Your Personal Information

Generally, we collect your information when you decide to interact with us. We collect information by fair and lawful means, with your knowledge and consent. This could be when you enquire about our services, make an appointment over the phone or by email or visit us in person for treatment. We also look at how our people use our website.

## 2) The Types of Information We Collect

We only collect the information that's necessary to carry out our business, provide the particular service you've requested and to keep you informed. There are occasions when you can choose not to give us certain information, but this may limit the level of personalisation we offer. For example, you may not hear about new treatment initiatives or special offers.

### More information

The type of information we collect depends on where and when it is gathered:

Information we obtain directly from you:

- Prefix and Name
- Gender
- Date of birth
- Email address
- Contact phone number(s)
- Home/Mailing address
- Work address
- Payment card details. Please note, we will not hold payment information for any longer than it takes to process your transaction.
- Medical history
- Details of diagnosis, treatment and results

This data is considered "identifying information", as it can personally identify you. We only request personal information relevant to providing you with a service, and only use it to help provide or improve this service.

When you visit our website, our servers may automatically log the standard data provided by your web browser. This data is considered “non-identifying information”, as it does not personally identify you on its own. It may include your computer’s Internet Protocol (IP) address, your browser type and version, the pages you visit, the time and date of your visit, the time spent on each page, and other details.

We may also collect data about the device you are using to access our website. This data may include the device type, operating system, unique device identifiers, device settings, and geo-location data. What we collect can depend on the individual settings of your device and software. We recommend checking the policies of your device manufacturer or software provider to learn what information they make available to us. Cookies: for further information about Cookies and how the Free To Be Creative uses them, please read the Free To Be Creative Cookie Policy.

#### Social Media

Depending on your settings or the privacy policies for social media and messaging services like Facebook, WhatsApp or Twitter, you may give us permission to access information from those accounts or services.

## **4. Why We Collect Your Personal Information and How We Use It**

**The information we hold on you will be used in a number of ways. Here are the main ones: to provide a service you have requested, offer you a personalised experience and understand your needs better, inform you of new treatments, initiatives or updates you’ve asked for or contact you if we need to obtain or provide additional information.**

### **More information**

Specifically, we use your information we collect in the following ways:

#### **To carry out our business and to provide a service or carry out a contract with you:**

- To fulfil treatment needs such as diagnosis, treatment history and results.
- Process payments. Please note that Free To Be Creative does not store any Credit Card or other payment information once the transaction has been completed.
- Provide the best possible patient service and to help us with internal administration.
- Contact you with important information relating to treatment, such as confirming your appointment or reminding you of an appointment you’ve booked.

### **Where we have your consent:**

- Send you updates via email about news and updates which relate to Free To Be Creative.
- Email you about a specific topic you've requested to hear more on, such as new treatment initiatives.
- Share your details with other providers with whom we are contractually connected for treatment and research purposes, such as Private Health Providers, Equipment Providers (e.g. Magnetic Resonance Therapies). These services may access our data solely for the purpose of performing specific tasks on our behalf. We do not share any personally identifying information with them without your explicit consent. We do not give them permission to disclose or use any of our data for any other purpose.

We may, from time to time, allow limited access to our data by external consultants and agencies for the purpose of analysis and service improvement. This access is only permitted for as long as necessary to perform a specific function. We only work with external agencies whose privacy policies align with ours.

### **Where we have justifiable reason (including legal obligation and legitimate interest):**

- Learn about your interests and preferences so that we can contact you with information that is relevant to you.
- Help us target our marketing communications and adverts so that they're more relevant to you.
- Measure and understand how our audiences respond to a variety of marketing activity so we can ensure our activity is well targeted, relevant and effective.
- Undertake due diligence to detect and reduce fraud and credit risk.

## **5. How We Handle Your Information and Other Organisations**

Free To Be Creative will never share, sell, rent or trade your personal information to any third parties for marketing purposes without your prior consent. Some of our service providers may have access to your data in order to perform services on our behalf – payment processing is a good example of this. We make sure anyone who provides a service for Free To Be Creative enters into an agreement with us and meets our standards for data security. They will not use your data for anything other than the clearly defined purpose relating to the service that they are providing.

### **More information**

We may share your details with:

Service providers who work on behalf of the Free To Be Creative for the performance of any contract we enter into with them or you, for example payment processing, equipment

providers (such as Magnetic Resonance Therapies), printers and mailing houses, marketing agencies, database services, website hosting or email delivery service.

Free To Be Creative is not responsible for the privacy notices and practices of other websites even if accessed using links from [www.freetobecreative.co.uk](http://www.freetobecreative.co.uk) and recommends that you check the notices of each website you visit and contact its owner or Data Protection Manager if you have any concerns or questions.

Despite all our precautions, no data transmission over the internet is 100% secure. So, we cannot guarantee the security of any information which you disclose to us and so wish to draw your attention to the fact that you do so at your own risk.

## **6. Data processing and storage**

As part of the service offered to you through Free To Be Creative, the personal information you provide may be transferred to countries outside the European Economic Area (EEA). By way of example, this may happen if the servers used to maintain our data are located in a country outside of the EEA. If Free To Be Creative transfers your personal information outside of the EEA in this way, we will take steps to ensure that your privacy rights continue to be protected as outlined in this privacy notice. We only retain personal information for as long as necessary to provide a service, or to improve our services in future or to fulfil the requirements of our insurance providers. While we retain this data, we will protect it within commercially acceptable means to prevent loss and theft, as well as unauthorised access, disclosure, copying, use or modification. That said, we advise that no method of electronic transmission or storage is 100% secure, and cannot guarantee absolute data security.

## **7. Your Choices**

You should find it easy to access and amend the personal information that we hold on you, or request that we stop contacting you. It's your data and we want to make sure you feel in control of it. You can request full details of the personal information we hold about you by speaking to one of our practitioners, or by phoning, emailing, or writing using our contact details below.

### **More information**

Every email we send to you will include details on how to change your communications preferences or unsubscribe from future communications. You can request full details of personal information we hold about you under the The General Data Protection Regulation, by contacting the Free To Be Creative Data Controller, Emily Gardiner. Please send a description of the information you would like to see, together with proof of your identity to [emily@freetobecreative.co.uk](mailto:emily@freetobecreative.co.uk)

If you would like us to remove the personal information we hold about you, please contact us using the contact details shown below. If you request your personal information be deleted, or where your personal information becomes no longer relevant to our operations, we will erase it from our system within a reasonable timeframe.

You have the right to lodge a complaint with the supervisory authority, The Information Commissioner's Office – [www.ico.org.uk](http://www.ico.org.uk)

**By email:** [emily@freetobecreative.co.uk](mailto:emily@freetobecreative.co.uk)

**By phone:** 07854 587341

**By post:** Free To Be Creative, Pied Calf Cottage, 13 Main Street, Lyddington, Rutland, LE15 9LR.

## **8. Updates or Changes to the Privacy Notice and Further Information**

This notice was updated on 3rd January 2024. It may be updated to take into account changes at Free To Be Creative or, for example, to reflect changes to regulation or legislation. Updates to this notice will be posted on this page – please check back from time to time. We may also inform you of any changes where we hold an appropriate email address for you.