

Privacy policy 2026 – The Sanguine Smith
(Last updated May 2026)

Therapist's Name/Identity: Kath Smith

Therapist's Contact Details:

Telephone No: 07747112901

Email address: hello@thesanguinesmith.com

Data Controller Contact Details:

Kath Smith trading as The Sanguine Smith is the data controller.

Kath Smith / 07747112901

Registered with the Information Commissioner's Office (ICO) as required under UK data protection law.

The type of personal information we collect:

In order to give professional reflexology treatments and run baby & toddler classes, I will need to ask for and keep information about your child's / your health. I will only use this for informing treatments / classes and any advice I give as a result of your treatment.

The information to be held is:

- Your contact details
- Medical history and other health-related information
- Lifestyle information (adult clients only)
- Details of products used in skincare if having a facial treatment
- Treatment details and related notes

I will only share your information where necessary and lawful, including where required by law, for insurance purposes, or safeguarding concerns.

How we get the personal information and why we hold it

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- For informing treatments and any advice I give as a result of your treatment.
- To be aware of any contraindication to treatment / classes.
- Provide you with the best possible treatment options, support and advice.

For personal information relating to children

- Data is provided by a parent/ legal guardian
- Consent is given by parent / legal guardian

Lawful Basis for holding and using Client Information:

Under the UK General Data Protection Regulation (UK GDPR), the lawful basis we rely on for processing this information are:

Article 6(1)(f) – legitimate interests (**main basis**)

(f) **We have a legitimate interest** i.e. my requirement to retain the information in order to provide you with the best possible treatment options and advice.

Article 6(1)(c) – legal obligation (**for retention rules**)

(c) We have a legal obligation:

- 1.1. 'Claims occurring' insurance: (records to be kept for 7 years after last treatment)
- 1.2. Law regarding children's records (records to be kept until the child is 25 or if 17 when treated, then 26)

Article 9 basis: Provision of health care / treatment

As I hold special category data (i.e. health related information), the additional condition under which I hold and use this information is: for me to fulfil my role as a health care practitioner bound under the AoR Confidentiality as defined in the AoR Code of Practice and Ethics.

DPA 2018 states the condition as "for health and social care purposes" at Article 9(2)(h).

Protecting Your Personal Data:

I am committed to ensuring that your personal data is secure.

In order to prevent unauthorised access or disclosure, I have put in place appropriate technical, physical and managerial procedures to safeguard and secure the information we collect from you.

These include:

Password-protected devices

Locked filing storage

Limited access

GDPR compliant payment and online form tools

I will contact you using the contact preferences you give me in relation to:

- Appointment / class times
- Reflexology information or information related to your health
- Client feedback following treatments (individual clients only – not group classes)

Marketing will only be sent out with explicit consent given in 'New client information form', or 'baby/ toddler class consent form'

- Special offers, newsletters and promotions

We keep your personal treatment information and contact details for 7 years as required by law (or until 25 if a child). We will then dispose of your information by shredding physical documents and deleting any digital files from all devices.

Marketing information is retained until consent is withdrawn.

Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.

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, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact me at hello@thesanguinesmith.com if you wish to make a request.

THERAPIST'S RIGHTS

Please note:

- If you don't agree to your therapist keeping records of information about you and your treatments, or if you don't allow them to use the information in the way they need to for treatments, the therapist may not be able to treat you
- Your therapist has to keep your records of treatment for a certain period as described above, which may mean that even if you ask them to erase any details about you, they might have to keep these details until after that period has passed
- Your therapist can move their records between their computers and IT

systems, as long as your details are protected from being seen by others without your permission.

How to make a complaint:

Please submit your complaint **in writing** via email to hello@thesanguinesmith.com. To help us investigate your concern as efficiently as possible, please include:

- Your full name and preferred contact details
- A clear description of your concern and which data protection right(s) you believe have been affected
- The approximate date(s) when the issue occurred
- Any relevant reference numbers, correspondence or documents

Our Complaints process:

Once we receive your complaint, we will follow the five steps below. We are committed to handling all complaints promptly, fairly and confidentially.

1. Acknowledgement — within 30 days

We will acknowledge your complaint in writing within 30 days of receiving it, confirming that we have recorded it and will be investigating.

2. Requesting Further Information

If we need any additional details to fully investigate your complaint, we will contact you as soon as possible and explain what we need and why.

3. Investigation & Review

We will carry out a thorough and impartial review of your complaint. We will agree a realistic timescale with you once we have all necessary information, and we will keep you updated if there are any delays.

4. Decision & Outcome

We will communicate the outcome of our investigation to you clearly and in writing within one calendar month of receiving all the information needed (this may be

extended by up to two further months for complex complaints — we will notify you if this is the case).

5. Closure or Escalation

If you are satisfied with the outcome, we will close your complaint. If you remain dissatisfied, you have the right to refer your complaint to the ICO free of charge (see Section 6 below).

Escalating your complaint to the ICO

If you remain dissatisfied with our response, you have the right to lodge a complaint with the Information Commissioner's Office (ICO) — the UK's independent supervisory authority for data protection. This service is free of charge.

ICO website: <https://ico.org.uk/make-a-complaint/>

ICO helpline: 0303 123 1113 (Monday–Friday, 9am–5pm)

ICO postal address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Data Breach:

In the event of a data breach, I will comply with UK GDPR reporting requirements.