Louise Unwin OT

Privacy Policy — Baby Massage Classes

Last updated: 9 September 2026

Louise Unwin OT ("we", "us", "our") provides paediatric occupational therapy and baby massage classes for babies aged 0–2 and their parents/carers, based in Cheltenham. This policy explains what personal information we collect when you book onto or attend a baby massage class, why we collect it, how we use it, who we share it with, how long we keep it, and what rights you have. It is written to meet our obligations under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

1. Who we are

The data controller responsible for your personal information is:

Louise Unwin

Trading as Louise Unwin OT

Cheltenham, Gloucestershire

Email: **louiseunwinot@outlook.com** | WhatsApp: **+44 7822 014382**

ICO registration number: **ZC226688**

If you have any questions about this policy or how your information is used, please contact us using the details above.

2. Information we collect

When you enquire about, book, or attend a baby massage class with us, we may collect the following information about you (the parent/carer) and your child:

- Your name, address, email address and telephone/WhatsApp number
- Your child's name, date of birth, and gestational age at birth (if relevant)
- Relevant health, developmental or medical information about your child needed to run the class safely (for example, skin conditions, allergies, feeding routines, birth history, or any diagnosed conditions) — this is "special category" data under UK GDPR (for therapy clients)
- Details of the classes or blocks of therapy booked, attendance records, and any notes made during or between sessions
- Payment information (we do not store full card details — these are processed by our payment/booking provider)
- Photographs or video taken during classes, where you have given separate consent (see section 5)
- Correspondence between us, such as emails, messages or WhatsApp messages

We collect this information directly from you, usually via a booking or enquiry form, WhatsApp, email, or conversation before or during a class.

3. How we use your information and our legal basis

We use your and your child's information for the following purposes:

- To manage bookings, process payments and administer classes and therapy blocks — necessary for the performance of our contract with you (UK GDPR Article 6(1)(b))
- To run baby massage classes safely, as a qualified IAIM (International Association of Infant Massage) Infant Massage Instructor, and to provide occupational therapy input tailored to your child — necessary for the performance of our contract, and for special category health information, necessary for the provision of health care (Article 9(2)(h)) or based on your explicit consent (Article 9(2)(a))
- To contact you about your bookings, class changes, or safety matters — necessary for the performance of our contract
- To keep clinical and class records in line with our professional obligations as an HCPC-registered occupational therapist — necessary for compliance with a legal/regulatory obligation (Article 6(1)(c)) and our legitimate interests in maintaining accurate professional records (Article 6(1)(f))
- To meet our accounting and tax obligations — necessary for compliance with a legal obligation (Article 6(1)(c))
- To send you information about future classes, availability or relevant updates, where you have opted in — based on your consent (Article 6(1)(a)), which you may withdraw at any time
- To take and use photographs/videos for promotional purposes, only where you have given separate, explicit consent (Article 6(1)(a) and Article 9(2)(a))

We do not use your or your child's information for any automated decision-making or profiling.

4. Sharing your information

We do not sell your information. We may share limited information with:

- Booking, scheduling or payment platforms we use to run our business (acting as data processors under contract)
- Other health or education professionals involved in your child's care (for example a GP, health visitor or nursery), but only with your consent or where there is a safeguarding concern
- Our accountant or bookkeeper, for financial administration
- Regulatory or professional bodies (such as the Health and Care Professions Council or the International Association of Infant Massage), where we are required to demonstrate compliance with professional standards
- The relevant authorities, where we have a safeguarding concern about a child's welfare, or where we are legally required to do so

We do not transfer your information outside the UK. If this changes, we will update this policy and put appropriate safeguards in place.

5. Photographs and video

We may wish to take photographs or video during classes for teaching purposes or promotional use (for example, on our website or social media). We will always ask for your separate, explicit, opt-in consent

before doing so, and will make clear how the images will be used. You can decline, or withdraw your consent at any time, without affecting your child's place in classes. If you withdraw consent, we will stop using the image going forward and will remove it from any materials under our control where reasonably practicable.

6. How long we keep your information

We only keep personal information for as long as necessary for the purposes it was collected, and in line with professional and legal record-keeping requirements. Our retention periods are:

- Clinical and class records relating to your child (including health/developmental information, session notes, and assessment records): retained until your child's 25th birthday. This reflects standard professional record-keeping guidance for children's health-related records (recognising that a claim relating to care received as a child can, in some circumstances, be brought many years later, once the child reaches adulthood). If your child was already close to age 18 when we last saw them, we may retain records for a short period beyond their 25th birthday, in line with the same guidance.
- General booking, contact and correspondence records not linked to a health record: retained for up to 3 years after your last contact with us, unless you ask us to delete them sooner
- Financial records (invoices, payment records): retained for 6 years after the end of the relevant tax year, to meet HMRC requirements
- Photographs/video used with consent: retained until you withdraw consent or for a maximum of 5 years, whichever is sooner, unless we agree a different period with you

Because some of this information relates to your child’s health and therapy, we cannot always delete it earlier on request — UK GDPR recognises that records may need to be kept to meet legal or professional obligations, or to allow us (or you) to establish, exercise or defend a legal claim, even after you ask us to erase it. Where this applies, we will explain our reasons if you ask us to delete your information (see section 8).

7. Keeping your information secure

We take the security of your and your child's information seriously. Louise Unwin is the only person who has access to your and your child's personal and health information — it is not accessed by any other staff, associates or third parties other than as set out in section 4 (Sharing your information). We store electronic records using password-protected and, where possible, encrypted systems, and keep any paper records in a locked, secure location. We review our security measures regularly and will notify you and the Information Commissioner's Office if we become aware of a data breach that is likely to result in a risk to your rights and freedoms.

8. Your rights

Under UK GDPR, you have the right to:

- Be informed about how we use your information (this policy)
- Access a copy of the personal information we hold about you or your child
- Ask us to correct inaccurate or incomplete information

- Ask us to delete your information, or restrict how we use it, in certain circumstances
- Object to us using your information for particular purposes, including direct marketing
- Ask for your information to be provided to you, or transferred to another organisation, in a portable format
- Withdraw consent at any time, where we rely on consent (for example, marketing or photographs), without affecting the lawfulness of anything done before you withdrew it

To exercise any of these rights, please contact us at **louiseunwinot@outlook.com**. We will respond within one month. If you are unhappy with how we have handled your information, you also have the right to complain to the Information Commissioner's Office (ICO) at **ico.org.uk** or on 0303 123 1113.

9. Children's information and parental consent

Our classes are for babies and very young children, who cannot themselves consent to how their information is used. We therefore collect and hold information about your child based on the consent and instruction of you, their parent or legal guardian, and we treat you as responsible for the accuracy of the information you give us and for any consents given on your child's behalf (for example, consent to photographs). If parental responsibility is shared, we assume that the parent/carer providing information to us has the authority of the other parent(s)/guardian(s) to do so, unless we are told otherwise.

10. Changes to this policy

We may update this policy from time to time, for example to reflect changes in the law or in how we run our classes. The “Last updated” date at the top of this policy shows when it was last revised. We encourage you to check back periodically, and we will let you know of any significant changes directly where appropriate.

11. Contact us

If you have any questions, concerns, or would like to exercise any of your rights, please get in touch:

- Email: louiseunwinot@outlook.com
- WhatsApp: +44 7822 014382
- Post: Louise Unwin OT, Cheltenham, Gloucestershire

This document is a template starting point and does not constitute legal advice. Before publishing it, please have it reviewed by a solicitor or check it against the ICO's guidance for small businesses (ico.org.uk) to make sure it fully reflects how your business actually collects and uses information.