

Privacy and cookie policy

This Privacy Policy sets out the data processing practices of Capital Physio Limited. Please note that all data thus captured will be used and held in accordance with the requirements of the Data Protection Act 2018.

While using our service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. Personally identifiable information may include, but is not limited to, your email address, name, phone number, postal address (“Personal Information”). The ways in which this data will be collected will be; face to face, over the phone, via online forms, our online chat and secured website portals.

Capital Physio Limited collect and create the above data to facilitate and manage your rehabilitation treatment with Capital Physio Limited. This information is used to ensure you are contacted and referred appropriately, and at a location near to you.

Capital Physio Limited is the controller and our Data Protection Officer is Marcus Kay. If you have any requests concerning your personal data or any queries with regard to how we handle your data you can contact the DPO by phone on 03303330435, email Marcus.kay@capitalphysio.com or write to us at Marcus Kay, Capital Physio Limited, 88 Kingsway, London, WC2B 6AA.

Purpose of processing your personal data:

Activity	Purpose of processing	Lawful basis
Completing an order form on the website	Dealing with an order/ reservation/booking you place	Contract
	Internal accounting processes	Contract
	Provide you with information about our products and services	Consent/Legitimate interests
Registering at an event	Dealing with your request to attend an event	Contract
	Providing you with information about our products and services	Consent
Making an enquiry via email/Live call/online chat/Face to face	Dealing with your enquiries or requests	Contract
	Providing you with information about our products and services	Consent
Booking an appointment via email/Live call/online chat/Face to face	Dealing with an order/ reservation/booking you place	Contract
	Internal accounting processes	Contract
	Provide you with information about our products and services	Consent/Legitimate interests

Referral through a Third party/insurer/intermediary	Dealing with an order/ reservation/booking you place	Contract
	Internal accounting processes	Contract
	Provide you with information about our products and services	Consent/Legitimate interests

The legal basis on which we rely are:

Consent – Depending on how we are in contact, we will take consent via live call, email or opt-in consent from our online order form on our website to collect valid consent. With this information we will use it to automate profiling, cookies, send promotional offers and provide a marketing channel. You can opt out of this service anytime through any of our marketing communication.

Contract – processing is necessary for us to administer the pre-contract and contractual relationship between ourselves and our suppliers/customers/potential employees in connection with the performance of a contract.

Legitimate interests – Personal Data is held and processed on the lawful basis that such action is in the Legitimate Interest of providing period clinic updates, the latest expert articles and details of upcoming events for you and has been considered through the use of a Legitimate Interest Assessment. Personal data is collected and processed with the intent to supply you with the best patient care.

1. Marketing

From time to time, Capital Physio compiles online and offline client information for internal analyses, such as market research, quality assurance, customer experience, and marketing benchmarking initiatives. Capital Physio is committed to respecting your privacy preferences and offers the following ways through which you may control how we contact you and disclose your information. We will honour your requests accordingly.

To guard against unauthorized access, we have in place commercially reasonable technical and other controls to help protect the information. Please note that no method of transmission over the Internet or of electronic storage is 100% secure and, therefore, Capital Physio cannot guarantee security.

Capital Physio may modify this Privacy Policy. Please see at the “Policy Last Updated” date at the end of this Privacy Policy to see when this Privacy Policy was last revised. Any changes to this Privacy Policy will become effective when we post the revised Privacy Policy on this page. Your use of the Crain Products or your provision of personal information to us following these changes means that you accept the revised Privacy Policy.

Email Marketing: We provide individuals with the opportunity to opt out of receiving Capital Physio promotional emails, newsletters, and updates about new Capital Physio clinics, features, products, and services. You may opt out of receiving such promotional communications by sending an email to clientcare@capitalphysio.com or by calling our Customer Service at 033 0333 0435. You may change

your preferences at any time. We may continue to send you transactional or service-related emails, such as communications regarding your account or subscription service, despite your desire to not receive promotional or marketing email messages.

Telemarketing: Capital Physio Limited provide businesses and organizations with the opportunity to place themselves on our company's internal Do Not Call list should they no longer wish to receive telemarketing calls from us. We may continue to call you for transactional or service-related purposes despite your desire to not receive telemarketing calls.

Direct Mail Marketing - Capital Physio Limited provide businesses and organizations with the opportunity to place themselves on our company's internal Do Not Mail list should they no longer wish to receive marketing or promotional mailers. We may continue to send you transactional or service-related correspondence despite your desire to not receive marketing mailers.

Mobile Consents - Capital Physio Limited may provide you messages, including marketing, via your wireless email address or by short message service (SMS), wireless access protocol (WAP) services, our mobile app or mobile phone service. By providing us with your wireless email address or by signing up for any SMS, WAP, app or mobile phone service, you consent to receiving services and messages at the address or number you provide for such purposes and understand that your wireless carrier's rates apply to these services/messages. You may opt-out of SMS, WAP or mobile services by contacting us at clientcare@capitalphysio.com or by calling our Customer Service at 033 0333 0435.

Third-Party Marketing - Capital Physio Limited may pass your information to our third-party service providers, agents subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf. However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes.

Individuals whose business contact information we have in our professional contacts database may request to be excluded from business lists that we use for marketing purposes. An individual who wishes to be removed from our marketing list sales may request to be removed either in writing or by calling our Customer Service, resulting in that individual's business contact record removal from our marketing directories and mailing lists. For additional information or to request removal, please contact us at clientcare@capitalphysio.com or by calling our Customer Service at 033 0333 0435. While we may remove your individual business contact information from our professional contact directory and marketing lists, please be aware that we will continue to send you transactional or service-related emails, such as communications regarding your account or subscription service, despite your desire to not receive promotional or marketing email messages.

Website Use Information

You have additional choices regarding website use information that our third-party advertisers and partners may collect or receive through the employment of cookies, Web beacons, pixel tags, clear GIFs, and other similar media. Please see the "Third-Party Advertisers" section below for more information.

Profiling - Capital Physio Limited may analyse your personal information to create a profile of your interests and preferences so that we can contact you with information relevant to you. We may make use of additional information about you when it is available from external sources to help us do this effectively. Any information that we obtain when someone subscribes to our blog or fills out a form

on our website helps us to build a better profile of who we are talking to and it helps to improve your buyer experience too. The more we understand about you, the more relevant the content we send or direct you to will be.

2. Recipients/categories of recipients

In carrying out our business including our obligations to you, we may use sub-contractors. These will be [mailing houses, email broadcasters, marketing agencies]. We will ensure that they respect your privacy and abide by all data protection laws.

3. Retention periods

We will keep your personal data in connection with the services/products you have bought for 8 years after your last treatment. We need to retain this data for our own records in line with the Chartered Society of Physiotherapy (CSP) guidelines. Capital Physio Limited has in place a data life cycle policy to ensure that we keep your data only as long as necessary, considering the data protection principles and codes of best practice

In terms of personal data we use for marketing, we will keep this data for as long as we are able to market to you and if you withdraw your consent or opt-out of marketing communications, we will keep your contact details only to ensure that we do not contact you again for marketing purposes.

4. Data subject's rights

You have rights in respect of your personal data. We will need to confirm your identity before we can consider your request so, if you wish to exercise any of these rights, we will need either a copy of your passport, driving licence or a utility bill.

The right to be informed – you have the right to be told about the collection and use of the personal data you provide. This privacy policy sets out the purpose for which we process your personal data, how long we will keep your data, who we will share your data with. If you have any questions on how and why we process your data please contact the DPO. If you want to know more about this right, the ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-be-informed/>

Right of access – you have the right to know whether we are processing your personal data, and to a copy of that data. We would need as much information as possible to enable us to locate your data. We will respond to your request within 28 days of receipt of your request. If you want to exercise this right, please contact the DPO at the contact details above. If you want to know more about this right, the ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-of-access/>

Right to rectification – you have the right to have any incorrect personal data corrected or completed if it is incomplete. You can make this request verbally or in writing. We will need as much information as possible to enable us to locate your data. We will look at any request and inform you of our decision within 28 days of receiving the request. If you want to exercise this right, please contact the DPO at the contact details above. If you want to know more about this right, the ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-rectification/>

Right to erasure – this right, often referred to as the right to be forgotten allows you to ask us to erase personal data where there is no valid reason for us to keep it. We will look at any request and inform you of our decision within 28 days of receiving the request. If you want to exercise this right, please contact the DPO at the contact details above. If you want to know more about this right, the ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-erase/>

Right to restrict processing – you have the right to ask us to restrict processing of your data. We will look at any request and inform you of our decision within 28 days of receiving the request. If you want to exercise this right, please contact the DP at the contact details above. If you want to know more about this right, the ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-restrict-processing/>

Right to data portability – you have the right to move, copy or transfer your personal data from one IT environment to another. This right applies to data that you have provided to us and that we are processing on the legal basis of consent or in the performance of a contract and that processing is by automated means. We will respond to your request within 28 days of receipt of your request. If you want to exercise this right, please contact the DPO at the contact details above. If you want to know more about this right, the ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-data-portability/>

Right to object – you have the right to object to our processing of your personal data based on (i) legitimate interests, or for the performance of a task in the public interests/exercise of official authority (including profiling); (ii) direct marketing (including profiling); and (iii) for purposes of scientific/historical research and statistics.

- (i) Legitimate interests/legal task – your objection should be based on your particular situation. We can continue to process the data if we can demonstrate compelling legitimate grounds which override your interests.
- (ii) Direct marketing – you have an absolute right to ask us to stop processing for the purposes of direct marketing. We will action your request as soon as possible.
- (iii) Scientific/historical research and statistics - your objection should be based on your particular situation. If we are conducting research where the processing is necessary for the performance of a public task, we can refuse to comply with your objection.

If you want to exercise this right, please contact the DPO at the contact details above. If you want to know more about this right, the ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-object/>

Rights relating to automated decision making including profiling – you have the right in respect of automated decision making, including profiling. Where we carry out solely automated decision making, including profiling, which has legal or similarly significant effects on you, we can only do this if it is in connection with a contract with you, we have a right under law or you have provided your explicit consent. We will tell you if this happens and tell you how you can request human intervention or challenge the decision. If you want to exercise this right, please contact the DPO at the contact details above. If you want to know more about this right, the ICO has more guidance on

their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/rights-related-to-automated-decision-making-including-profiling/>

5. Processing based on consent

Where we process your personal data based on your consent you have the right to withdraw that consent at any time without reason. You can opt-out by using the unsubscribe/opt-out in any marketing we send you and you can contact the DPO at the contact details above.

6. The right to lodge a complaint to the supervisory authority

If you are unhappy with any aspect of our handling of your data you can make a complaint to the Information Commissioner's Office - <https://ico.org.uk/concerns/>

7. Statutory/contractual requirement to provide personal data.

The personal data that you provide to us is necessary for us to carry out the contract you have entered into with us or for us to perform our obligations under Statute. This refers to the minimum requirements set out by healthcare industry standards to be able to provide treatment required to meet your individual needs. The personal data required to fulfil these obligations are

8. Cookies.

Cookies are files with small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and stored on your computer's hard drive.

We use "cookies" to collect information, identify you when you visit this website and to keep track of your browsing patterns and build up a demographic profile. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service. Find out more about cookies on <http://www.allaboutcookies.org/>

Cookies, Web Beacons, Pixel Tags, and GIFs - We design the layout and features of our website so that new visitors may anonymously learn about our products and services without revealing their identities. For new visitors, we use cookies or Web beacons to collect limited data, such as the date, time, and areas of our website that are visited, as well as the website from which the new visitor came. When you select one of our products or services, register for a newsletter or email alert, or complete a survey, we may try to identify your browser; and we may combine information from cookies, Web beacons, and other information collected online with other data that we maintain about you. By improving the features, marketing, and content of our website and by making your online experience more convenient and meaningful, we can better serve our customers' needs.

A Web beacon is a graphic image, such as a pixel tag or clear GIF, which is placed on a Web page or in an email message to monitor user activity, such as whether the Web page or email message is accessed or clicked. They are often invisible because they are very small in size. They are also used on many Web pages for alignment purposes. We sometimes use Web beacons to provide an independent accounting of how many people visit our website or to gather statistics about browser usage on our website.

9. Third party websites.

We may use third-party advertising companies to serve ads when you visit our website. While serving advertisements, our third-party advertisers and partners may place or recognize a unique cookie on your browser. These companies may use information about your visits to Capital Physio and other websites to provide advertisements on this site and other sites about goods and services that may be of interest to you. These third-party partners may monitor how guests use our website and determine which of our online features they prefer. We may report information to our partners about our customers and the products and services they order, as well as aggregated, non-identifiable information about our guests' use of our website. For more information, please see the "Third-Party Advertisers" section below.

These third-party advertising networks also track visitors' online usage and behaviour patterns. These companies may use information about your visits to Capital Physio and other websites to provide advertisements on this site and other sites about goods and services that may be of interest to you. The result of these efforts is the creation of an online profile that attempts to predict individual user interests, preferences, and purchasing habits. The third-party advertising networks then accordingly customize the advertising content served to users when visiting other websites.

Links to other websites: Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third-party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

If at any point you would like to opt-out of receiving communications from us, or would like to change the channels (such as email or post) that we use to contact you, please contact our Client Care Team at clientcare@capitalphysio.com or write to us at 88 Kingsways, London, WC2B 6AA.

10. Changes to the privacy policy.

This privacy policy is regularly reviewed and will be updated when necessary. If we make any significant changes to the policy we will communicate these to you.