

Updated: 1 July 2024



PRIVACY POLICY

We take our client's privacy very seriously, and this document sets out our policies regarding your personal data.

SCOPE OF THIS POLICY :

This document refers to personal data, which is defined as information concerning any living person (a natural person who hereafter will be called the Data Subject) that is not already in the public domain. The General Data Protection Regulation (GDPR) which is EU wide and far more extensive than its predecessor the Data Protection Act, along with the Privacy and Electronic Communications Regulations (PECR), seek to protect and enhance the rights of EU data subjects. Guernsey's equivalent, **The Data Protection (Bailiwick of Guernsey) Law, 2017, came into force on 25 May 2018.** These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU and its storage within the EEA.

(1) - INTRODUCTION :

Wild Wolf Wellbeing Limited, based at **Natural Health Clinic, Rue Maze, St Martins, Guernsey, GY4 6NS**, which hereafter for the purposes of this Privacy Notice will be referred to as "**Wild Wolf Wellbeing**", is pleased to provide the following information:

(2) - WHO WE ARE :

Wild Wolf Wellbeing- we are a wellbeing business which includes a team of specialised professionals and administration staff. We offer a variety of services which are to expand to cover all areas of wellbeing, all of which are carried out in accordance with each professional's respective accreditations. The services Wild Wolf Wellbeing currently provide include: Counselling, Psychotherapy and Coaching through our self employed approved partners. Additional services will be offered to clients from time to time, and these will be clearly made visible on our website and online booking system.

(3) - LEGAL BASIS FOR PROCESSING ANY PERSONAL DATA :

To meet our contractual obligations obtained from explicit consent and legitimate interest to respond to enquiries concerning the services provided.

(4) - LEGITIMATE INTERESTS PURSUED BY WILD WOLF WELLBEING :

To promote services for clients with all types of health and wellbeing problems indicated for the conversations and services referred by Wild Wolf Wellbeing.

(5) - CONSENT :

Through agreeing to this privacy policy you are consenting to Wild Wolf Wellbeing processing your personal data for the purposes outlined. You can withdraw consent at any time by using the postal, email address or telephone number provided at the end of this Privacy Notice.



wildwolfwellbeing.com



listen@wildwolfwellbeing.com

Wild Wolf Wellbeing Ltd

Registered Office:

Natural Health Clinic, Rue Maze,
St Martins, Guernsey, GY4 6NS

Registered Number: 71508



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(6) - PERSONAL DATA :

Ta) For the purposes of providing our services, Wild Wolf Wellbeing may require detailed medical information. We will only collect what is relevant and necessary for your treatment. When you visit our clinic online or in-person, we will make notes which may include details concerning your medication, treatment and other issues affecting your health. We adhere to a strict confidentiality code with regards to management of patient information. This data is always held securely (on a cloud based system), is not shared with anyone not involved in your treatment process, although for data storage purposes it may be handled by administration staff who have all signed an integrity and confidentiality agreement.

To be able to process your personal data it is a condition of any treatment that you give your explicit consent to allow Wild Wolf Wellbeing to document and process your personal medical data. Contact details provided by you such as telephone numbers, email addresses, postal addresses may be used to remind you of future appointments and provide reports or other information concerning your treatment.

As part of our obligations as healthcare practitioners there may be circumstances related to your treatment, on-going care or medical diagnosis that will require the sharing of your medical records with other healthcare practitioners e.g. GPs, consultants, surgeons and/or medical insurance companies. Where this is required we will always inform you first unless we are under a legal obligation to comply.

b) For marketing purposes Wild Wolf Wellbeing may also use the contact details provided by you to respond to your enquiries, including making telephone contact and emailing information to you, which the practice believes may be of interest to you. You have the option to opt in to receive marketing materials when booking your appointment and this can be amended by you in the online portal at any time.

c) In making initial contact with the practice you consent to Wild Wolf Wellbeing maintaining a marketing dialogue with you until you either opt out (which you can do at any time). Wild Wolf Wellbeing do not broker your data and you can ask to be removed from our marketing database in the online portal, or by emailing the practice using the contact details provided at the end of this Privacy Notice.

d) Some basic personal data may be collected about you from the marketing forms and surveys you complete, from records of our correspondence and phone calls and details of your visits to our website, including but not limited to, personally identifying information like Internet Protocol (IP) addresses.

e) Wild Wolf Wellbeing website uses cookies, which is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. Our website uses cookies to help Wild Wolf Wellbeing to identify and track visitors and their website access preferences. Wild Wolf Wellbeing's website visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using Wild Wolf Wellbeing's website.

f) Wild Wolf Wellbeing will only collect the information needed so that we can provide you with the services you require, the business does not sell or broker your data.

(7) - RETENTION POLICY :

Wild Wolf Wellbeing will process personal data during the duration of any treatment and will continue to store only the personal data needed for a minimum period of eight years. Records concerning minors who have received treatment will be retained at least until the child has reached the age of 25. However, as a general principle, electronic patient records will be kept indefinitely as permitted for the legal management of medical records.



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(8) - DISCLOSURE :

Wild Wolf Wellbeing will keep your personal information safe and secure. Only members of the team (which includes your therapists and some administration staff) essential for the management of your treatment and administration services (including billing) will have access to the patient data (which may include consultation notes) that they require for the fulfilment of their duties. All those working with Wild Wolf Wellbeing have signed strict confidentiality agreements. Wild Wolf Wellbeing will not disclose your Personal Information unless compelled to, in order to meet legal obligations, regulations or valid governmental requests. The practice may also enforce its Terms and Conditions, including investigating potential violations of its Terms and Conditions to detect, prevent or mitigate fraud or security or technical issues; or to protect against imminent harm to the rights, property or safety of its staff.

(9) - YOUR RIGHTS AS A DATA SUBJECT :

At any point whilst Wild Wolf Wellbeing are in possession of, or processing your personal data, all data subjects have the following rights:

RIGHT OF ACCESS

You have the right to request a copy of the information that we hold about you.

RIGHT OF RECTIFICATION

You have a right to correct data that we hold about you that is inaccurate or incomplete.

RIGHT OF PORTABILITY

You have the right to have the data we hold about you transferred to another organisation.

RIGHT TO OBJECT

You have the right to object to certain types of processing such as direct marketing.

RIGHT TO RESTRICTION OF PROCESSING

Where certain conditions apply you have a right to restrict the processing.

RIGHT TO BE FORGOTTEN

In certain circumstances you can ask for the data we hold about you to be erased from our records.

RIGHT TO OBJECT TO AUTOMATED PROCESSING

including profiling – You also have the right not to be subject to the legal effects of automated processing or profiling.

In the event that Wild Wolf Wellbeing refuses your request under rights of access, we will provide you with a reason as to why, which you have the right to legally challenge the refusal. At your request Wild Wolf Wellbeing can confirm what information it holds about you and how it is processed.

(10) - DATA STORAGE :

We use a cloud based client relationship management ("CRM") system called Hubspot for holding and communicating with clients for the purposes of sales, forms and communications. All other data is held and stored in Google Workspace for Business.



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(11) - DISCLOSURE :

Wild Wolf Wellbeing uses data processors to perform certain tasks essential in the running of the business. The data processors may change from time to time, but any changes will be updated in this notice.

These include:

- HubSpot: Marketing automation software and CRM - See the following link for more information on how HubSpot store and use personal data: [Hubspot](#)
- Google: Google Analytics, Google Ads, Google Workspace- See the following link for more information on how Google store and use personal data: [Google](#)

Any other data processors will be updated and listed in our data notice as and when they are utilised under strict confidentiality agreement with Wild Wolf Wellbeing.

(12) - YOU CAN REQUEST THE FOLLOWING INFORMATION :

- Identity and the contact details of the person or organisation (Wild Wolf Wellbeing) that has determined how and why to process your data.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Wild Wolf Wellbeing and information about these interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- How long the data will be stored.
- Details of your rights to correct, erasure, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority The office of the Data Protection Commissioner (ODPC).
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.



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(13) - TO ACCESS WHAT PERSONAL DATA IS HELD, IDENTIFICATION WILL BE REQUIRED :

Wild Wolf Wellbeing will accept the following forms of identification (ID) when information on your personal data is requested: a copy of your driving licence, passport, birth certificate and a utility bill not older than three months. A minimum of one piece of photographic ID listed above and a supporting document is required. If Wild Wolf Wellbeing is dissatisfied with the quality, further information may be sought before personal data can be released. All requests should be made to tim@wildwolfwellbeing.com or by writing to us at the address further below.

(14) - COMPLAINTS :

In the event that you wish to make a complaint about how your personal data is being processed by Wild Wolf Wellbeing, you have the right to complain to us. If you do not get a response within 30 days, you can raise your complaint to the ODPC.

The details for each of these contacts are:

The person responsible for data protection at Wild Wolf Wellbeing:

Tim Rowe
Telephone: +44 (0) 7781 133300
or email: tim@wildwolfwellbeing.com

The office of the Data Protection Commissioner (ODPC):

Data Protection Office
Guernsey Information Centre
North Esplanade
St. Peter Port
Guernsey
GY1 2LQ

Telephone: +44 (0) 1481 742074
Email: enquiries@dataci.org