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PRIVACY POLICY

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| Name | Self Space Privacy Policy |
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| Date | 07/10/24 |
| Review Date |  |
| Owner |  |
| Author | Robin Hogg |
| Interdependencies | Data Protection PolicyDisciplinary PolicyStaff handbooks |

**PRIVACY POLICY**

**PLEASE READ THIS POLICY CAREFULLY. IF YOU DO NOT ACCEPT THESE TERMS, YOU ARE ADVISED NOT TO USE THE WEBSITE OR APP**

This Privacy Policy is subject to regular review in order to ensure we remain compliant with data protection guidance and applicable legislation. You are encouraged to refer to this page on each visit to the website or App to ensure that you are up-to-date with our policies and practices in relation to the handling of personal data.

We also have a practice Confidentiality Policy which is available on our website, upon request and which will also be verbally summarised at your first Self Space session.

This Privacy Policy is effective from 7th of October 2024.

**1. POLICY ACCEPTANCE**

This Privacy Policy applies to the website https://www.selfspace.com (“website”) and our App, operated by The Self Space Limited (“Self Space”) and shall include all personal data processed by us through direct mail, telephone or social media channels. Any reference to “you” or “your” means you, the user.

Your acceptance of this Privacy Policy is deemed to occur upon your first use of the website. You are required to read and accept this Privacy Policy when you engage with us.

**2. POLICY STATEMENT**

Self Space recognises the trust you place in us when you share personal data with us. We are committed to being open, honest and transparent with our use of personal data.

This Privacy Policy provides you with details of the personal data we collect when we engage with you, how we will use and look after your personal data, your privacy rights and how the law protects you. We will take all reasonable steps to ensure that personal data is safeguarded and kept in accordance with applicable data protection law.

**3. ABOUT US**

Self Space launched in February 2018 as a contemporary, proactive and forward-thinking mental wellbeing service. All bookings are made directly via our Branded App, Website or the MINDBODY bookings app.

Self Space is registered in England and Wales under company registration number 10996170. Our registered office address is **4th Floor 4 Tabernacle Street, London, United Kingdom, EC2A 4LU**

Where we manage personal data, we identify as both a Data Controller and Data Processor and recognise and act on our obligations under applicable data protection law, including but not limited to the EU General Data Protection Regulation and the Data Protection Act 2018. We are registered with the Information Commissioner’s Office (ICO), registration number ZA491860.

For any issues relating to data protection the person responsible is Robin Hogg. You can contact us in relation to data protection matters by email to hr@theselfspace.com or hey@theselfspace.com

**4. WHAT PERSONAL DATA DO WE COLLECT?**

Personal data is any information relating to an identified or identifiable individual. It does not include data where the identity has been removed (i.e. anonymous data). We may collect, use, store and transfer different kinds of personal data about you when we engage with you. This may include:

(a) Identity Data - title, first name, last name, date of birth or similar identifiers. If you interact with us through social media, this may include your social media username;

(b) Contact Data - billing address, email address and telephone numbers;

(c) Financial Data – bank account and payment card details;

(d) Transaction Data - details about services we have provided to you;

(e) Technical Data - includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access the website;

(f) Profile Data – your username and password, your preferences, feedback and survey responses;

(g) Geographical Data - information setting out your primary address to control the use of location services in most mobile devices and desktop settings;

(h) Usage Data - information about how you use our website and services;

(i) Marketing and Communications Data - includes your preferences in receiving marketing from us and our third parties and your communication preferences.

**5. HOW DO WE COLLECT PERSONAL DATA?**

We use different methods to collect data from and about you, through:

Using ‘Contact Us’ on the website and booking Apps, by engaging with us for product or service delivery and by other legitimate means of engagement

We collect details of a user’s name, email and phone number as well as subject and content of any message when using our online contact form to get in touch. This information enables us to communicate with our clients, suppliers and third parties and facilitates our service provision. We may process personal data on the basis of being legitimate to our business or in order to fulfil a contractual obligation in relation to our services.

**Applying to work at Self Space**

Self Space has access to and processes personal data for applicants who express an interest in joining our team in order to conduct our business. We process this data in line with the consent of those supplying the detail and for future reference should our employment requirements change in the future.

We use Monday.com to process this information and have ensured that they as data controllers comply with their legal requirements. Their privacy notice can be found here [Privacy Policy - monday.com Legal Portal](https://monday.com/l/privacy/privacy-policy/)

**Registration**

Personal details provided during registration on our website and booking apps are processed so that we can register you and respond to your communications with details of vacancies and our job application procedure. Data is held in preparation for entering into an agreement with you and with your consent.

**Bookings**

Personal details provided during the booking process, either directly or through the MindBody App, may be processed by us on the basis of being legitimate to our business or in order to fulfil a contractual obligation in relation to our services.

**Emails**

We retain copies of emails sent to us and any personal data will be held in accordance with this Privacy Policy on the basis of being legitimate to our business interests.

**Telephone calls**

Calls to us may be recorded and any data relating to the call may be retained by us. Personal data will be held on the basis of being for our legitimate business needs or in order to fulfil our contractual obligations if you are a client of ours.

**Other direct interactions**

You may give us your data by filling in forms or by corresponding with us face-to-face, by post, when attending any events, training, talks or workshops we hold, or through our social media channels. This includes personal data you provide when you: register to receive our services; make enquiries or request information be sent to you; use our services; ask for information to be sent to you; engage with us on social media; contact us directly; or leave comments or reviews on our services.

**Social media**

We use social media to engage with users and link to our Facebook, Instagram, LinkedIn and Twitter pages. We do not keep any specific data that identifies you as an individual user but hold details of our followers on these platforms. You should refer to the Privacy Policy of these channels to understand how they treat your data in relation to linking to our site.

Facebook: https://www.facebook.com/privacy/explanation Instagram: https://wellbeing.instagram.com/safety LinkedIn: https://www.linkedin.com/legal/privacy-policy Twitter: https://twitter.com/en/privacy

If you send us a direct message via social media, the details may be retained by us only as relevant to any ongoing contract or to further our legitimate business interests or as required for legal purposes. The third-party provider may also retain details in accordance with their Privacy Policy.

**Visits to our website**

When you visit our website, we do not attempt to identify you as an individual user, and we will not collect personal data about you unless you specifically provide this to us.

As you interact with our website, technical data may be automatically processed through the use of Cookies, details of which are explained in our Cookie Policy.

**Trusted Partners**

We work with certain partners in developing and delivering our services in order to develop as a business and deliver the core services that we offer. A full list of these partners with their associated privacy policies can be found [here](#_Other_Trusted_partners.). These partners collect personal data and process on it our behalf.

## **Special Category data**

We collect some special category data that is relevant to the issues you present in the course of our counselling services. Examples of some of the sensitive information our therapists may gather is:

▪ Gender, ethnicity and marital status;

▪ Religious or other cultural beliefs;

▪ Physical or mental health or condition;

▪ Sexual orientation and or data related to your sex life.

We will ask you some personal details about yourself - why you wish to attend Self Space sessions, whether you have a medical diagnosis, if you are currently on medication, whether you are receiving clinical mental health treatment and whether you have had any suicidal thoughts in the last 6 months. These notes enable us to provide a safe and informed space for you with the therapist that you choose. It also ensures that some basic information about you can be made available to other therapists should you decide to change your therapist. Such information is only provided on a need to know basis. This data and all other data regarding health ie clinical notes are stored and processed on our partners (Mindbody) platform and are subject to their processes.

**All Special Category Data is stored by our trusted partner MINDBODY** (https://www.mindbodyonline.com) who are a third party Data Processor with whom we have a contractual agreement to provide booking services. We have taken appropriate steps to ensure that MINDBODY is compliant with data protection law and regulations. MINDBODY acts on our instructions and will process your data in accordance with their Privacy Policy. Please refer to their policy at <https://company.mindbodyonline.com/legal/privacy-policy>

**Children**

We do not actively market this website at those under 18 years old. Consistent with the GDPR we will never knowingly request personally identifiable information from anyone under the age of 18 years old unless they are engaging with us therapeutically. We will take appropriate steps to delete any personal data of individuals less than 18 years of age that has been collected by our website upon learning of the existence of such data unless relating to clinical service provision where it is stored in line with Special Category Data (detailed below).

**6. INFORMATION WE GET FROM OTHER SOURCES**

From time to time, we may need to obtain information from third parties about you. This will only apply where it is necessary to provide our services and as permitted by law.

We may receive personal data relating to your identity and contact data from data partners and data from any third parties who are permitted by law or have your permission to share your personal data with us, such as via social media.

**7. HOW WE USE YOUR DATA**

UK data protection law requires us to have a “legal basis” for processing personal data. The legal bases we rely on are:

▪ Performance of a contract we are about to enter into or have entered into with you;

▪ Compliance with a legal or regulatory obligation;

▪ Carrying out activities that are legitimate to our business interests;

▪ Consent. However, generally, we shall not rely on consent as a legal basis for processing your personal data other than where the law requires it. Where our legal basis is consent, you have the right to withdraw consent any time.

We may use the personal data we collect from you as outlined in this summary table:

What data do we collect and process

(a) Identity Data - title, first name, last name, date of birth or similar identifiers. If you interact with us through social media, this may include your social media username;

(b) Contact Data - billing address, email address and telephone numbers;

(c) Financial Data – bank account and payment card details;

(d) Transaction Data - details about services we have provided to you;

(e) Technical Data - includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access the website;

(f) Profile Data – your username and password, your preferences, feedback and

Survey responses;

(g) Geographical Data - information setting out your primary address to control the use of location services in most mobile devices and desktop settings;

(h) Usage Data - information about how you use our website and services;

(i) Marketing and Communications Data - includes your preferences in receiving

|  |  |
| --- | --- |
| Why we Collect it | What we Collect (refer to bullet points above) |
| A | B | C | D | E | F | G | H | I |
| Online registration | Y | Y |  |  |  |  |  |  |  |
| Performance of a contract or to take steps to enter into a contract to provide, manage and personalise our services to you, respond to communications  | Y | Y |  |  |  |  |  |  |  |
| To process payments  | Y | Y | Y | Y |  |  |  |  |  |
| Performance of a Contract or to take steps into entering a contract. | Y | Y | Y | Y | Y | Y |  | Y | Y |
| Necessary to comply with a legal obligation to administer and improve the website  |  |  |  |  | Y |  |  | Y |  |
| To send email notifications which have been specifically requested  | Y | Y |  |  |  |  |  |  |  |
| To process marketing information and where necessary send marketing communications, where expressly agreed eg newsletters;  | Y | Y |  |  |  | Y |  |  | Y |
| To provide third parties with statistical information about our users  |  |  |  |  | Y | Y |  | Y |  |
| To ask for feedback or review  | Y | Y |  |  |  | Y |  |  |  |
| To deal with enquiries and complaints  | Y | Y |  |  | Y | Y |  | Y |  |
| To recover debt and exercise other rights we have under any agreement with you, as well as to protect ourselves against harm to our rights and interests in property  | Y | Y | Y | Y |  |  |  |  |  |
| Application processing | Y | Y |  |  |  |  |  |  |  |

**Detailed list of the reasons for us using personal data.**

Use of personal data Type of data Legal basis

**Online registration**

(a) Identity

(b) Contact

It is in our legitimate business interests and in order to deliver a safe service that we need to obtain and process identify and contact details of those people coming to our service.

**To provide, manage and personalise our services to you, respond to communications**

1. Identity

(b) Contact

Where necessary for the perform of our agreement or to take steps to enter into an agreement

It is in our legitimate interests to make sure that our customer accounts are well-managed, and to provide a high standard of service

**To process payments**

(a) Identity

(b) Contact

(c) Financial

(d) Transaction

**Performance of a contract or to take steps into entering a contract**

a) Identity

(b) Contact

(c) Financial

(d) Transaction

(e) Technical

(f) Profile Data – your username and password, your preferences, feedback and

**Survey responses;**

(h) Usage

i) Marketing and Communications Data - includes your preferences in receiving

It is our legitimate business interest to collect and process this data in order to fulfil a contractual obligation.

**Necessary to comply with a legal obligation to administer and improve the website**

(e) Technical

(h) Usage

It is in our legitimate interests to develop and improve our products and services, so that we can continue to provide products and services that our customers want to use, and to make sure we continue to be competitive

**To send email notifications which have been specifically requested**

(a) Identity

(b) Contact

**To process marketing information and where necessary send marketing communications, where expressly agreed eg newsletters;**

(a) Identity

(b) Contact

(i) Marketing and Communications Data - includes your preferences in receiving

It is in our legitimate interests to give you information about our products and services that you may be interested in

**Communications**

In the case of electronic marketing when we have your consent to do so.

To provide third parties with statistical information about our users

(e) Technical

(h) Usage

It is in our legitimate interests to better understand how our customers use our products and what changes we could make to improve them

**To ask for feedback or review**

(a) Identity

(b) Contact

(f) Profile Data – your username and password, your preferences, feedback and

Survey responses;

It is in our legitimate interests to better understand how our customers use our products and what changes we could make to improve them

**To deal with enquiries and complaints**

(a) Identity

(b) Contact

(e) Technical

(f) Profile Data – your username and password, your preferences, feedback and

Survey responses;

(h) Usage

It is in our legitimate interests to make sure that our customer accounts are well-managed, so that our customers are provided with a high standard of service

**To recover debt and exercise other rights we have under any agreement with you, as well as to protect ourselves against harm to our rights and interests in property**

(a) Identity

(b) Contact

(c) Financial

(d) Transaction

Where necessary to perform a contract or to take steps to enter into an agreement with you where the law requires this.

It is in our legitimate interests to ensure that we can recover debts owed to us, as well as making sure our assets are protected

Users contacting this website and/or its owners do so at their own discretion and provide any such personal data requested at their own risk. Your personal data is kept private and stored securely until a time it is no longer required or has no use.

**Our legitimate interests**

When we use our legitimate interests as the legal basis for processing your personal data, we will consider and balance any potential impact on you and your rights before we process your personal data. We will only then proceed where we believe our interests are not overridden by the impact on you. Our legitimate interests include the management of our business operations.

**8. SHARING INFORMATION**

**Disclosure**

We don’t share, sell, or distribute your data to third parties, except as contractually agreed with you or as explained in this Privacy Policy. We may disclose your personal data if we are required to do so by law, in connection with any legal proceedings, and in order to establish, exercise or defend our legal rights, or if otherwise legally permitted.

We may need to use your information and personal data to contact your GP or emergency contact. This will be in exceptional circumstances such as when we have a duty of care or are required by law to provide information about you.

If you are a staff member of a Company purchasing our services we will not share your data or any other information with that Company except with your permission (extending service provision etc).

We may disclose personal data to a third party to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change such as this happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy.

**Counselling Notes and use of Zoom/Google meet**

Therapists may keep brief handwritten notes of the counselling sessions for their own records and must ensure that measures are taken to protect the confidentiality of clients at all times. Notes should not identify any individual client.

Records must comply with the Regulations and Codes of Practice determined by a counsellor’s accreditation body. Therapists are also required to adhere to the Self Space Documentation Management Policy.

No recordings are kept of sessions conducted by Zoom or Google Meet, but you are recommended to refer to the Privacy Policy or the relevant platform provider for details of how this third party use data.

See [Privacy | Zoom](https://explore.zoom.us/en/privacy/)

[Google Meet security and privacy for users - Google Meet Help](https://support.google.com/meet/answer/9852160?hl=en-GB)

**Supervision**

Therapists are required to have regular supervision with another professional therapist as part of their professional accreditation. Therapists do not disclose any personally identifying information about clients within supervision.

**Data Processors**

We use Data Processors who act on our instruction in relation to the management of your personal data and where this applies, all data processors are required to confirm that they adhere to data protection law and regulations. We will ensure that any Data Processors used only operate on our written instructions and comply with their obligations under the GDPR. Data Processors who provide services to Self Space include those providing therapy sessions, or other services such as workshops, groups or training events. Personal data is only collected and/or provided on a need to know basis.

You will be informed of any other Data Controllers who have access to your data and who may determine processing activities separately to us, or as a Joint Data Controller.

**MINDBODY**

Our client data is stored by MINDBODY (https://www.mindbodyonline.com) who are a third party Data Processor with whom we have a contractual agreement to provide booking services. We have taken appropriate steps to ensure that MINDBODY is compliant with data protection law and regulations. MINDBODY acts on our instructions and will process your data in accordance with their Privacy Policy. Please refer to their policy at <https://company.mindbodyonline.com/legal/privacy-policy>

**MONDAY**

The details of those expressing a wish to work with us is retained by Monday.com who are a third party Data Processor with whom we have a contractual agreement to provide technical services. We have taken appropriate steps to ensure that MONDAY is compliant with data protection law and regulations. MONDAY acts on our instructions and will process your data in accordance with their Privacy Policy. Please refer to their policy at [Privacy Policy - monday.com Legal Portal](https://monday.com/l/privacy/privacy-policy/)

**Google Drives**

Self Space use google docs and other cloud based google products for day to day document storage. Google are a third party Data Processor.

 We have taken appropriate steps to ensure that GOOGLE is compliant with data protection law and regulations. GOOGLE acts on our instructions and will process your data in accordance with their Privacy Policy. Please refer to their policy at [Privacy Policy – Privacy & Terms – Google](https://policies.google.com/privacy?hl=en-US)

**Other Trusted partners.**

We work with trusted partners who collect and process data on our behalf. The following are partners who collect and process data on our behalf. None of the data processed by these partners contains any Special Category Data and in order to access our services each data processing partner requires the person supplying the data to have agreed to their policies. Each processing partner is listed here with a link to their privacy policies and a description of the data they process on our behalf.

**Planhat**

<https://www.planhat.com/legal/privacy-policy-20211101>

Planhat is a customer success software platform that we use to manage our clients journey through the booking and marketing processes.

**Hubspot**

<https://legal.hubspot.com/privacy-policy>

Hubspot is a CRM platform that allows more effective marketing processes in order to increase effectiveness of it is used for marketing purposes.

**Hi BOB**

<https://www.hibob.com/privacy/privacy-policy/>

Hibob is a HR platform that we use for storing staff information, recruiting staff and managing our workforce.

**Quick Books**

<https://quickbooks.intuit.com/hk/privacy/>

Quick Books manages the effective payments for all PAYE and freelance staff

**Docusign**

<https://www.docusign.com/company/privacy-policy>

Docusign is a secure platform that we use to obtain signatures on contracts and other legally binding agreements.

**Linktree**

<https://linktr.ee/s/privacy>

allows us to create a personalised landing page with multiple links to our social media profiles and websites.

**Connecteam**

[Privacy Policy | Connecteam](https://connecteam.com/privacy/)

Connecteam allows us to complete internal communications with our team of PAYE employees and freelance staff.

**Typeform**

[Typeform's terms, conditions & policies](https://admin.typeform.com/to/dwk6gt?typeform-source=www.google.co.uk)

Typeform is a web-based platform that allows users to create interactive forms, surveys, quizzes, and feedback tools. We use it to engage with clients and allow them to feed into events or provide details for services we offer.

**Calendy**

<https://calendly.com/legal/privacy-notice>

Calendly is a scheduling automation platform that helps people and organizations schedule meetings, appointments, and events.

**Notion Labs**

<https://www.notion.so/help/privacy>

Notion Labs is a software company that provides a platform for knowledge management, project management, and task management. We use it to store our policies and other operational documents that are accessible to our team.

**Otta**

<https://otta.com/privacy-policy>

Otta is a job search platform that helps job seekers find relevant roles and improve their job search experience.

**Honch**

<https://www.honch.co/privacy-cookie-policy#:~:text=We%20do%20not%20track%20individual,provide%20the%20service%20we%20do>.

Honch is a UK-based B2B data platform that helps companies identify and target potential customers by tracking key buying signal.

**Circle**

[Privacy Notice | Circle](https://circle.so/privacy)

Circle provide a service that creates connections between our service and communities.

**Linked In**

<https://www.linkedin.com/legal/privacy-policy>

is a business based social media platform that contains some personal information. We have a linkedin account.

**hootsuite**

<https://www.hootsuite.com/trust-center/privacy>

Hootsuite is a social media management platform that helps users create, schedule, and publish content, and engage with their audience

**Eventbrite**

<https://www.eventbrite.co.uk/help/en-gb/articles/460838/eventbrite-privacy-policy/>

Eventbrite is a stand alone event and booking platform that we use to facilitate some events.

**Mailchimp**

[Mailchimp's Legal Policies | Mailchimp](https://mailchimp.com/legal/)

Mailchimp is a marketing platform that helps businesses manage and communicate with their customers and other interested parties.

**Zapier**

[Zapier Privacy Policy](https://zapier.com/privacy)

Zapier is a web-based automation tool that connects apps and services to automate tasks without coding:

Shopify

<https://www.shopify.com/uk/legal/privacy>

Shopify help by processing your details when buying merch.

Zettle

<https://www.zettle.com/gb/legal/privacy-policy>

We use Zettle for card payments in our locations.

Paypal

<https://www.paypal.com/gb/legalhub/privacy-full>

We use paypal for paying and receiving money, usually for equipment and merch.

**Marketing**

We may carry out direct marketing by email, phone, text or post. We will ask for your consent to receiving marketing communications (including newsletters) when you register on the website and you have the option not to give consent and to withdraw consent given at any time. You may withdraw your consent for us to contact you by email to hr@theselfspace.com or hey@theselfspace.com. We may continue to contact you for non-marketing purposes if there is another lawful basis to do so. Non-personally identifiable information may be provided to other third parties for marketing, advertising or other uses.

**External links**

Users of the website are advised to adopt a policy of caution before clicking on any external web links. Clicking an external link will take the user away from our website. Once you leave our website or are redirected to a third-party website, plug-in or application, you are no longer governed by this Privacy Policy or our website’s terms and conditions. We cannot guarantee or verify the contents of any externally linked website and users click on external links at their own risk. Self Space and its owners cannot be held liable for any damages, or the consequences of visiting any external links.

**Social media platforms**

Communication, engagement and actions taken through external social media platforms that this website and its owners participate on are subject to our terms and conditions as well as the privacy policies held with each social media platform respectively.

Users are advised to use social media platforms wisely and communicate and/or engage with them with due care and caution in regard to their own privacy and personal details. This website nor its owners will not ask for personal or sensitive information through social media platforms and encourage users wishing to discuss sensitive details to contact them through primary communication channels such as by telephone or email. Self Space uses social sharing buttons which help share web content directly from web pages to the social media platform in question. Users are advised that before using such social sharing buttons, that they do so at their own discretion, and should consider that the social media platform may track and save requests to share a web page, through the users’ social media platform account.

**Payment processing**

In order to process your account and take payment for your Self Space sessions we will take your Debit/Credit card details which is stored on Mindbody. They are monitored and require annual compliance with the PCI (Payment Card Industry), which means we must follow their technical and operational standards to ensure that credit card data provided by cardholders is safeguarded and that all payment transactions are carried out securely.

**Reviews/Evaluation of our service**

We may ask for a review of our services and these may be published on our website or social media, if you give your consent for us to do so. You may withdraw your consent at any time.

**9. DATA RETENTION**

We keep your personal data in accordance with our Data Retention Policy which reflects our needs to provide services to you as contracted and also as required to meet legal, statutory and regulatory obligations. The need to hold information is regularly reviewed and data will be disposed of when no longer required.

**10.DATA SECURITY**

We have put in place appropriate security measures to prevent personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, personal data is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems and are required to keep the information confidential. We take appropriate steps to ensure a safe processing of personal data, however, we cannot guarantee the security of data transmitted through our website or by email. Any such transmission is at the sender’s own risk.

**11.DATA STORAGE AND TRANSFERS**

Any information including personal data that you supply to us may be stored and processed by MINDBODY, [www.mindbodyonline.com](http://www.mindbodyonline.com) or Monday.com. Your data may be transferred in accordance with their policies and under relevant data protection law. You can refer to the Privacy Policy at https://company.mindbodyonline.com/legal/privacy-policy.

We may transfer some or all of your data to countries outside of the EEA where such countries provide adequate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission (EC).

Where data is to be transferred to a country outside of the EEA which does not offer the same level of protection as the GDPR with respect to the processing of personal data, we will ensure that the company agrees to similar levels of protection.

Where we transfer data to any organisation based in the US, we may transfer data to them where they provide similar protection to personal data shared between the Europe and the US.

Our website is hosted by WPEngine.com and storage of the website and any transfers do not include personal data.

**12.RIGHTS OF DATA SUBJECTS**

Self Space recognises a data subject's rights and will uphold these in accordance with data protection law. In relation to certain rights, we may ask you for information to confirm your identity and, where applicable, to help us to search for your personal information. Except in rare cases, we will respond to you within one month from either (i) the date that we have confirmed your

identity or (ii) where we do not need to do this because we already have this information, from the date we received your request.

You should note that the following rights may not be absolute and may not be upheld where there is valid justification not to do so.

**Subject access requests**

You have the right to ask for a copy of the information that we hold about you by email to hr@theselfspace.com or hey@theselfspace.com. We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information. In limited circumstances a fee may apply.

**Right to rectification**

Data subjects have the right to request that personal data is amended or changed if it is inaccurate or incorrect. We act on any such request without delay.

**Right to erasure**

Data subjects have the right to ask us to delete personal data from our systems without giving any reason and at any time. We act on any such request without delay.

**Right to restrict processing**

Data subjects have the right to rectification or erasure of personal data in the following circumstances:

Personal data is not accurate; - The processing of data is unlawful; - Data is required to exercise legal rights or defend legal claims; - Data is unlawful, although there may be lawful grounds for processing, which

override this right.

**Right to data portability**

Data subjects have the right to obtain and request the transfer of their data to a different service provider.

**Right to object**

Data subjects have the right to object to the processing of personal data at any time based on their circumstances. This includes objecting to profiling unless it is in the ‘public interest’ or exercised lawfully by an official authority. We will only process personal data upon a legal basis.

**Right not to be subject to decisions based on automated processing**

Self Space do not use any automated processing that results in any automated decision based on personal data.

**Exercising your rights**

If you wish to invoke any of your rights as a data subject, you should contact us by email to hr@theselfspace.com or hey@theselfspace.com

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. We may refuse to comply with your request in limited circumstances.

**13.DATA BREACHES**

We will report any unlawful breach of data as required by the GDPR within 72 hours of the breach occurring, if it is considered that data within our control including the control of our data processors, has been compromised, or potentially compromised. If the breach is classified as ‘high risk’ we will notify all data subjects concerned using an appropriate means of communication. We will report relevant breaches as required to the ICO, see below.

**14.CHANGES TO OUR PRIVACY POLICY**

We reserve the right to change this Privacy Policy at any time and users are recommended to review it frequently. Changes will take effect immediately upon their posting on the website. You will be deemed to have accepted any changes to the terms of the privacy policy on your next visit of the website following the amendment.

**15.REPORTING COMPLAINTS**

If you wish to raise a concern about the use of your personal data, you can contact us by email to hr@theselfspace.com or hey@theselfspace.com Alternatively, you can formally raise a concern or complaint to the Information Commissioner’s Office (ICO), the UK regulatory authority for data protection: Address: Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow Cheshire SK9 5AF

Telephone: 0303 123 1113

Website: https://ico.org.uk/concerns