

Holistic Axis Privacy Policy

Our contact details

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Website:	www.holisticaxis.com
Date of Privacy Notice:	05.10.2022
Data Privacy Manager:	Sonia Marta Wieckowska (sonia@holisticaxis.com)

This policy, together with our terms and conditions (<https://www.holisticaxis.com/tandc.php>), set out the basis upon which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purposes of data protection laws in the UK, the data controller is Holistic Axis. We are registered as a data controller with the Information Commissioner's Office ('ICO') under number **ZB342369**.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out above.

The legal basis for processing personal data

Personal data is any information that can (or could be used to) identify a living person, including names and delivery details. Most organisations use personal data in their daily operations.

The Data Protection Act 2018 controls how your personal information is used by organisations, businesses or the government.

The Data Protection Act 2018 is the UK's implementation of the General Data Protection Regulation (GDPR).

Everyone responsible for using personal data has to follow strict rules called 'data protection principles'. They must make sure the information is:

- used fairly, lawfully and transparently
- used for specified, explicit purposes
- used in a way that is adequate, relevant and limited to only what is necessary
- accurate and, where necessary, kept up to date
- kept for no longer than is necessary
- handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage

There is stronger legal protection for more sensitive information, such as:

- race
- ethnic background
- political opinions
- religious beliefs
- trade union membership
- genetics
- biometrics (where used for identification)
- health
- sex life or orientation

There are separate safeguards for personal data relating to criminal convictions and offences.

The type of information we collect from you

We will collect and process the following data about you:

- **Information you give us.** This is information about you that you give us by filling in forms on our site www.holisticaxis.com ("our Website") and www.holisticaxis.janeapp.co.uk (you can learn more about your personal data usage on Jane here: <https://jane.app/legal/privacy-policy>) or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you:
 - register to use our Website;
 - place an order for a service on our Website, and;
 - report a problem with our Website.
 - The information you give us may include:
 - your name;
 - address;
 - e-mail address;
 - phone number;
 - financial and credit card information, and;
 - medical information (including but not limited to mental and physical health).
 - We do not store credit card details nor do we share financial details with any third parties.
- **Information we collect about you.** With regard to each of your visits to our Website we will automatically collect the following information:
 - technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
 - information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our Website (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number.

How we get the personal information we obtain and why

The paragraphs in this section explain how and why we process your personal data, as well as the legal basis on which we carry out this processing.

- **To enter into and perform contracts with you:** Where you ask us to provide services to you, we will process your personal data to provide these services to you. We need certain personal information about you to perform the services for you. If you do not wish to provide us with your personal data in this way, you will be unable to use our services.
- **To improve the provision of our services:** We analyse personal data to identify areas so that we can improve our services and we sometimes engage third parties to assist us with this analysis. For example:
 - Analysing feedback you provide on external review platforms, on our website chat function or in emails and the way you interact with our service.
- **To help enhance our website:** We will also process your personal data in order to provide you with a more tailored experience when you visit our website. For example, we may use your personal data to tailor our website, make sure it is displayed in the most effective way for the device you are using. We also use various third-party cookies to help us improve our website (more details are set out in the sections below) but we will not share your personal data with the third-party analytics and search engine providers that assist us in the improvement and optimisation of our website.
 - We will also process your personal data for the purposes of making our website more secure, and to administer our website and for internal operations, including troubleshooting, data analysis, testing, research and statistical and survey purposes.
 - The legal basis on which we process your personal data in these circumstances is our legitimate interest to optimise website visitor

engagement, inform future content and to ensure that our website is kept secure.

- **For user experience research:** We have a legitimate interest to contact you in relation to your experience of using our products and services. We will use any feedback provided to tailor and improve our services. We may also conduct research to develop new products and services where input from users' experience would inform our approach.
- **For Holistic Axis marketing purposes:** We may contact you if your recent activity suggests you might want to hear from us (for example, you entered one of our promotions, you have used our services or you have an annual subscription with us), unless you have already indicated that you do not wish to receive marketing communications from us.
 - We process your personal data to form a view on what services, promotions or offers we think you may be interested in.
 - Our communications always include a link so you can unsubscribe. You can also let us know you would prefer not to be contacted by emailing unsubscribe@holisticaxis.com and clearly stating that you wish to be removed from our marketing list.
- **To permit tracking and attribution of referrals and campaigns from our commercial partners:** Where you have been referred by one of our commercial partners we will share some basic information relating to you (name and contact information) to allow our commercial partners to attribute referrals. This will be in addition to your communication preferences and this information will not be used for marketing purposes if you have not given consent for that purpose.
- **To build anonymised data sets:** Anonymised data is information which cannot be used to identify a living person. It is useful for statistical analysis and identifying general trends.
 - We will convert your personal data into an anonymised format so it can be used for press publication (for instance to show the age range of our clients, or geographical areas where we provide a high volume of service). Anonymised data is not personal data.
- **If our business is sold, we will transfer your personal data to a third party:** in the event that we buy or sell any business or assets, in

which case we will disclose your personal data to the prospective seller or buyer of such business or assets (at all times in accordance with all applicable data protection laws); or if Holistic Axis or substantially all of its assets are acquired by a third party, in which case personal data held by Holistic Axis about its customers will be one of the assets transferred to the purchaser.

- In each case, the legal basis on which we process your personal data in these circumstances is our legitimate interest to ensure our business can be continued by a purchaser. If you object to our use of your personal data in this way, the relevant seller or buyer of our business may not be able to provide services to you.

The basis for processing anonymised data

We process data and share it anonymously in order to help other individuals understand the effectiveness of our services on people in their age range or of their gender. We share the generalised demographic information, in order to help people make more informed decisions while maintaining your privacy.

Cookies

Cookies are small files of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site."

Our Website uses cookies to distinguish you from other users of our [Website](#). This helps us to provide you with a good experience when you browse our [Website](#) and also allows us to improve our [Website](#). By continuing to browse the [Website](#), you are agreeing to our use of cookies.

We use four types of cookies:

1. Strictly necessary cookies

Purpose: these are cookies that are required for the operation of our Website. They include, for example, cookies that enable you to log into

secure areas of our Website, use a shopping cart or make use of e-billing services.

2. Analytical/performance cookies

Purpose: they allow us to recognise and count the number of visitors and to see how visitors move around our Website when they are using it and before they call us. This helps us to improve the way our Website works, for example, by ensuring that users are finding what they are looking for easily.

3. Functionality cookies

Purpose: these are used to recognise you when you return to our Website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

4. Targeting cookies

Purpose: these cookies record your visit to our Website, the pages you have visited and the links you have followed. We will use this information to make our Website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties (such as the charities we work with) in order to make advertising displayed on other websites (such as Facebook) more relevant to your interests.

Blocking cookies

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our Website.

Do not track

We use your 'Do Not Track' status to decide whether to turn on tracking scripts such as **affiliates, etc.**

Most browsers let you turn on 'Do Not Track'. [Learn how to turn on 'Do Not Track' in your browser.](#)

Use of Information

We will combine the information you provide to us with information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

With whom we share your personal data

- **Our staff:** Our staff have access to your personal data.
- **Charities and businesses we work with:** For example the charities we work with in a fundraising event.
- **External parties:** That are performing tasks on our behalf (including subcontractors and professional advisors).
- **Regulatory authorities:** Where we have a legitimate legal reason for doing so.
- **Any actual or potential buyer of our business.**

How we store your personal information and period of storage

Your information is securely stored.

Where you register on our website and enter personal data but do not complete the booking process, we will retain your data for a period of 6 years after to ensure that we are able to assist you should you have any questions or feedback in relation to our services.

Where we have processed your personal data to provide you with marketing communications with your consent, we may contact you at least every 12 months to ensure you are happy to continue receiving such communications. If you tell us that you no longer wish to receive such communications, your personal data will be removed from our list.

Your rights under data protection laws

1. Right to object

You have the right to object to us processing your personal data where we are processing your personal data: based on our legitimate interests (as set out above). If you ask us to stop processing your personal data on this basis, we will stop processing your personal data unless we can demonstrate compelling grounds as to why the processing should continue in accordance with data protection laws; and for direct marketing purposes. If you ask us to stop processing your personal data on this basis, we will stop.

2. Right of access

You have the right to receive confirmation as to whether your personal data is being processed by us, as well as various other information relating to our use of your personal data. You also have the right to access your personal data which we are processing.

3. Right to rectification

You have the right to require us to rectify any inaccurate personal data we hold about you. You also have the right to have incomplete personal data we hold about you completed, by providing a supplementary statement to us.

4. Right to restriction of processing

You have the right to restrict our processing of your personal data where:

- the accuracy of the personal data is being contested by you;
- the processing by us of your personal data is unlawful, but you do not want the relevant personal data erased;
- we no longer need to process your personal data for the agreed purposes, but you want to preserve your personal data for the establishment, exercise or defence of legal claims; or

- we are processing your data on the basis of our legitimate interest (as set out above) and you:
 - object to our processing on this basis; and
 - want processing of the relevant personal data to be restricted until it can be determined whether our legitimate interest overrides your legitimate interest.

Where any exercise by you of your right to restriction determines that our processing of particular personal data is to be restricted, we will then only process the relevant personal data in accordance with your consent and, in addition, for storage purposes and for the purpose of legal claims.

5. Right to data portability

You have the right to receive your personal data in structured, standard machine-readable format and the right to transmit such personal data to another controller.

6. Right to erasure

You have the right to require we erase your personal data which we are processing where at least one of the following grounds applies:

- the processing is no longer necessary in relation to the purposes for which your personal data were collected or otherwise processed;
- our processing of your personal data is based on your consent, you have subsequently withdrawn your consent and there is no other legal ground we can use to process your personal data;
- you object to the processing as set out in the “right to object” section of this policy and we have no overriding legitimate interest for our processing;
- the personal data have been unlawfully processed; and
- the erasure is required for compliance with a law to which we are subject.

7. Exercising your rights

You can exercise such rights by contacting us at privacy@holisticaxis.com. We may require confirmation of your identity before acting on a request.

Links on our website

Our website may, from time to time, contain links to and from the websites of our partner networks and affiliates. Our service connects you to different websites. If you follow a link to any of these websites or use our service, please note that you have left our website and these websites have their own privacy policies. We do not accept any responsibility or liability for these policies or websites. Please check these policies before you submit any personal data to these websites.

Changes to our privacy policy

Any changes we make to our privacy policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy policy. We will inform you of any significant changes to this policy.

How to complain

If you have any concerns or queries relating to the use of your personal data, please let us know in the first instance by contacting complaints@holisticaxis.com and we would hope to resolve any issue informally.

However, if an issue cannot be resolved, you also have the right to lodge a complaint with the Information Commissioner's Office, the supervisory authority for data protection issues in England and Wales. For further information, please see <https://ico.org.uk/make-a-complaint/>.

The Information Commissioner's Office's details are as follows:

- **Address:** Information Commissioner's Office
Wycliffe House
Water Lane

Wilmslow
Cheshire, SK9 5AF

- **Helpline Number:** 0303 123 1113
- **Website:** <https://www.ico.org.uk>