

## Privacy Policy

### BounceOT

bOunceT Innovative Occupational Therapy CIC (referred to as bOunceT throughout the rest of this policy) full privacy policy is explained below, but the main points to note are:

- We will only ever ask you - or any relevant professionals/family/carers - for what we really need to know about you, or the individual referred, for participation in our services.
- We will collect and use the personal data that you share with us transparently, honestly and fairly.
- We will always respect your choices around the data that you share with us and the communication channels that you ask us to use.
- We will put appropriate security measures in place to protect the personal data that you share.
- We will never sell your data.
- We will keep all your personal data secure: filed and locked away [although we have a mission to go paperless by the end of 2023], uploaded to a protected business Cloud service and within encrypted products (iPad, Laptops, etc).

We encourage you to read the privacy policies of any external websites you visit via links on our website.

You can check the personal data we hold about you, and ask us to update it where necessary, by emailing us at [hello@bouncet.com](mailto:hello@bouncet.com).

*"bOunceT takes all possible and reasonable care to keep your details, payment and personal information secure, but in the absence of negligence on our part, we will not be liable for any loss you may suffer if a third party acquires unauthorised access to any Personal Information you provide when accessing our website".*

bOunceT reserves the right to make changes to and update this policy at any time.

## Privacy

It's important that you read and understand what follows because it explains how bOunceT collects and uses personal information provided to us.

We collect various information about you such as your full name, date of birth, address, contact information, payment information and other information applicable to carry out your request to us online - and in order to provide you with an ongoing improved level of service.

Such information will be gathered when:

- Accessing the BounceOT website.
- Registering an email address to request information from us, directly from the website. All info will be sent to our general email address: [hello@bouncet.com](mailto:hello@bouncet.com).
- Contacting us by telephone, email or writing to us or engaging with us on social media – we may keep a record of any correspondence.
- Completing any forms on the website or associated link.
- Completing any referral forms for yourself or an individual to access therapy sessions with the service (referral, disclaimer, medical form).
- Registering for employment or volunteering with bOunceT - in any capacity (e.g. Play Leader or a Director on our Board).
- Registering to become a brand ambassador, or similar.

bOunceT may keep any other information which can identify you (or which is available on public registers).

Personal information which you provide to us will be held securely and we will use and process your personal information in accordance with the Data Protection Act 1998, as amended from time to time, as well as any other relevant data protection or privacy legislation.

Please note that bOunceT reserves the right to disclose information in certain circumstances, as follows:

- Process any orders placed via the website (please note that it may be necessary to pass your details to a third party so that they may fulfil certain functions such as supply or deliver the product or service that you ordered. Details may be retained for a reasonable timeframe after you have completed the transaction in order to fulfil any contractual obligations such as refunds, exchanges, etc).
- Process payments and prevent fraudulent transactions (we may retain your details for these purposes for a reasonable length of time and we may pass your details to a third party to carry out these actions).
- With your consent, retain your personal information, preferences and details of your transactions to keep you informed by email, post, SMS mobile messaging, telephone and/or through other digital means including social media platforms, for which you have provided your details to us.
- Improve the content and appearance of the website to ensure that content is presented in the most effective manner for you.

- Assess and process your job application (we may retain a record of your information for a reasonable timeframe following the end of our recruitment selection process for administration purposes).
- Carry out valuation and examination (for example market, customer and product research) to enable us to review, develop and improve the products or services which we offer.

We require all the third parties that we interact with to treat your personal information as carefully and confidentially as we do.

Your personal information may be disclosed to other businesses within bOunceT which means our ultimate holding company and its subsidiaries, as defined in section 736 of the UK Companies Act 1985.

You agree that you do not object to us using your personal information for any of the purposes outlined in this privacy policy and you confirm that you do not and will not consider any of these purposes as a breach of any of your rights under the Privacy and Electronic Communications (EC Directive) Regulations 2003. This includes exchanging information with other companies and organisations for the purposes of managing and improving the quality of products and services we offer and for the purpose of fraud protection and credit risk reduction.

You should be aware that if we are requested by the police or any other regulatory or government authority or body investigating suspected illegal activities to provide your personal information or any other information we obtain about you, we are entitled or obliged to comply.

We will not keep your personal information processed by us for any purpose or purposes for longer than is necessary for that purpose or for those purposes. Under data protection legislation you have the right to access information held about you. If you chose to exercise this right, then any access request may be subject to an administration fee to meet our costs in providing you with details of the information we hold about you.

### **Unsubscribe from Communications**

The website and emails may, from time to time, contain links to and from the websites of our advertisers, partners, affiliates and social media platforms. If you follow a link, create an account or provide your information to any of these Websites, these websites have their own privacy policies and bOunceT does not accept any responsibility or liability for these policies. Please check individual policies before you submit any personal details to these websites. Please note it is at your discretion to submit personal information to these websites.

### **Cookies**

Cookies help us to continuously improve your experience with us at bOunceT.

Cookies refers to website tracking which allows us to see how you found the website, reward sites that brought you to us, see if you can access all of the features on the website, see how you spend time on our site; how often you visit, how long for and how often you come back, when you first visited our site and help us develop relevant advertising.

Please note that we don't control the setting of third-party cookies on links or social media sites, so we suggest you check the third-party websites for more information about their cookies and how to manage them. Please be aware you can set your browser to delete or reject cookies yourself if so you wish.

## **DATA PROTECTION OFFICER**

We are not required by law to have a "Data Protection Officer" – however we have a staff member who acts as a Data Protection Manager within their role.

Please let us know if you have any queries or concerns whatsoever about the way in which your data is being processed by either emailing the Data Protection Manager at [hello@bouncet.com](mailto:hello@bouncet.com) , phoning 01786 643535, or writing to use at the following address:

*Data Protection Manager  
Unit 113, John Player Building,  
Stirling Enterprise Park  
Stirling  
FK7 7RP*

## **Policy amendments**

We keep this Privacy Policy under regular review and reserve the right to update from time-to-time by posting an updated version on our website, not least because of changes in applicable law. We recommend that you check this Privacy Policy occasionally to ensure you remain happy with it. We may also notify you of changes to our privacy policy by email.

## **Data retention**

We are legally required to hold some types of information to fulfil our statutory obligations (e.g. clinical notes from therapy sessions and official reports to review meetings for each individual to other professionals involved in their care).

In general, unless still required in connection with the purpose(s) for which it was collected and/or is processed, we remove your personal information from our records five years after the date it was collected. However, if before that date (i) your personal information is no longer required in connection with such purpose(s), (ii) we are no longer lawfully entitled to process it or (iii) you ask us to delete it we will remove it from our records at the relevant time.

You can request to remove your personal information at any time by emailing [hello@bouncet.com](mailto:hello@bouncet.com)

## **Your rights and how consent works**

You have a choice about whether or not you wish to receive information from us. If you do not want to receive communications from us about the vital work we do and our exciting products and services, then you can select your choices by ticking the relevant boxes situated on the form on which we collect your information.

Where we rely on your consent to use your personal information, you have the right to withdraw that consent at any time. This includes the right to ask us to stop using your personal information for direct marketing purposes or to be unsubscribed from our email list at any time. You also have the following rights:

**(1) Right to be informed** – you have the right to be told how your personal information will be used. This Policy and other policies and statements used on our website and in our communications are intended to provide you with a clear and transparent description of how your personal information may be used.

**(2) Right of access** – you can write to us to ask for confirmation of what information we hold on you and to request a copy of that information. Provided we are satisfied that you are entitled to see the information requested and we have successfully confirmed your identity, we have 40 days to comply. As from 25 May 2018, we will have 30 days to comply.

**(3) Right of erasure** – as from 25 May 2018, you can ask us for your personal information

to be deleted from our records. In many cases we would propose to suppress further communications with you, rather than delete it.

**(4) Right of rectification** – if you believe our records of your personal information are inaccurate, you have the right to ask for those records to be updated.

**(5) Right to restrict processing** – you have the right to ask for processing of your personal data to be restricted if there is disagreement about its accuracy or legitimate usage.

**(6) Right to data portability** – to the extent required by the General Data Protection Regulations (“GDPR”) where we are processing your personal information (i) under your consent, (ii) because such processing is necessary for the performance of a contract to which you are party or to take steps at your request prior to entering into a contact or (iii) by automated means, you may ask us to provide it to you – or another service provider – in a machine-readable format.

To exercise these rights, please send a description of the personal information in question using the contact details below.

Where we consider that the information with which you have provided us does not enable us to identify the personal information in question, we may ask you for (i) personal identification and/or (ii) further information.

Please note that some of these rights only apply in limited circumstances. For more information, we suggest that you consult ICO guidance:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

You are further entitled to make a complaint about us or the way we have processed your data to the Information Commissioner’s Office (“ICO”). For further information on how to exercise this right, please see the guidance at:

<https://ico.org.uk/for-the-public/personal-information>.

The contact details of the ICO can be found here: <https://ico.org.uk/global/contact-us>

## **Security of and access to your personal data**

We endeavour to ensure that there are appropriate and proportionate technical and organisational measures to prevent the loss, destruction, misuse, alteration, unauthorised disclosure or of access to your personal information.

Your information is only accessible by:

- Trained staff
- Volunteers
- Partner organisation (relevant to specific individuals)

The security of your personal information is important to us but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security. As such we make no warranties as to the level of security afforded to your data, except that we will always act in accordance with the relevant UK and EU legislation.

Otherwise than as set out in this Privacy Policy, we will only ever share your data with your informed consent.

### **Further information**

- [Overview of the GDPR - General Data Protection Regulation](#)
- [Data Protection Act 1998](#)
- [Privacy and Electronic Communications Regulations 2003](#)
- [The Guide to the PECR 2003](#)
- [Twitter Privacy Policy](#)
- [Facebook Privacy Policy](#)
- [Google Privacy Policy](#)
- [Linkedin Privacy Policy](#)