

## ABOUT US:

Flow and Radiate is a United Kingdom based Sole Trader that operates under <https://flowandradiate.com> providing movement direction and coaching services, direction of shows, workshops, classes, courses, seminars, events, 1:1 sessions and 2:1 sessions, online and offline.

### **Our contact details**

Name: Viola Bruni

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Phone Number: 07539879429

E-mail: [hello@flowandradiate.com](mailto:hello@flowandradiate.com)

This is the privacy notice of Flow and Radiate. In this document, “we”, “our”, or “us” refer to Flow and Radiate.

We are committed to providing quality services to you and this Privacy Policy outlines our ongoing obligations to you in respect of how we manage your Personal Data.

This Policy describes the kind of information we collect, the purposes for which we use the information and how we may share this information. We appreciate your trust in us.

We have adopted the laws of the United States of America, Brazil, Australia, New Zealand, United Kingdom, Europe and abide by the General Data Privacy Regulations (“GDPR”) to provide a high standard to our client’s personal data and privacy (the “Data Acts”). The Data Acts govern the way that we collect, use, disclose, store, secure and dispose of your Personal Data. A copy of the Data Acts for each country may be seen below:

The Personal Data Protection and Electronic Documents Act, SC 2000, c5 (federal, Canada); the Personal Data Protection Act (Alberta, Canada); the Personal Data Protection Act (British Columbia, Canada); all applicable United States federal and state privacy laws, including, but not limited to, the

[California Online Privacy Protection Act](#)

[Brazilian General Data Protection Law](#)

[Australia](#)

[New Zealand](#)

[United Kingdom](#)

[General Data Protection Regulations](#)

And any other applicable privacy legislation (collectively the “Data Acts”).

We are the controller of any personal data gathered by your use of our website and services. Where we use third parties to process your data we can confirm all platforms are GDPR compliant.

## THE PURPOSE OF THIS POLICY:

In the course of providing you with our services, we will collect and process information that is commonly known as Personal Data.

This Policy describes how we collect, use, share, retain and safeguard Personal Data.

This Policy sets out your individual rights; we explain these later in the Policy but in summary, these rights include your right to know what data is held about you, how this data is processed and how you can place restrictions on the use of your data.

This Policy applies when you may share personal data in contact with us via our website, online forms, email, social media accounts, the telephone, when writing to us directly or where we provide you with paper based forms for completion or we complete a form in conjunction with you.

## WHAT IS PERSONAL DATA?

Personal Data is information relating to an identified or identifiable natural person. Examples include an individual’s name, age, address, date of birth, gender and contact details or other more sensitive data such as credit or debit card details. We are legally required to comply with specific data processing requirements for Personal Data.

## WHAT PERSONAL DATA IS COLLECTED BY US?

As a provider of movement direction and coaching services, direction of shows, workshops, courses, classes, seminars, events, 1:1 sessions and 2:1 sessions, we will process the following categories of data:

- Personal data such as an individual's full name, email, telephone number and after a purchase of class, course, workshop, seminar, event or 1:1 / 2:1 services, debit or credit card details will be stored.

If you object to the collection, sharing and use of your personal data we may be unable to provide you with our services.

We may record your communications with us when contacting our team. We may collect information about your visits to us to help us personalise your experience with us. By providing this information to us you are consenting to our use in the manner set out in this policy.

We do not knowingly accept information or attendance of anyone under the age of 18 years old. If you are under 18 years of age you will need your parent or guardian to agree to this Privacy Policy and terms for you. They are responsible to ensure that you fully understand what you are sharing with us and why.

## HOW WE GET THE PERSONAL INFORMATION AND WHY WE HAVE IT:

We will collect your personal data where you request information about our services, via our website, provide information in communications with us via in person, telephone, texts, social media, events, promotions, campaigns, from cookies and third parties. By providing this information to us you are consenting to our use in the manner set out in this Policy.

Our primary purpose for collecting and processing this Personal Data about you is to provide and administer our services to you, our clients and marketing. If you object to the collection, sharing and use of your personal data we may be unable to provide you with our services.

We may share this information with:

- any staff /subcontractors delivering the services the client has booked on
- professional advisers such as legal team in the event of a difficulty with a contract

- police or emergency services in the event of an incident involving a customer where it is either in the best interest of the customer or the public interest for us to do so
- the companies that provide our software, to securely store your data to perform specific functions to support our services: Google Drive, Calendly Scheduling, Squarespace. They have access to the personal information needed to perform their functions but may not use it for other purposes. Their privacy policy is linked below as to how they handle data as part of the service we use.

Google: <https://policies.google.com/privacy>

Calendly Scheduling: <https://calendly.com/privacy>

Squarespace: <https://www.squarespace.com/privacy>

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

- (a) Your consent. You are able to remove your consent at any time. You can do this by contacting us at [hello@flowandradiate.com](mailto:hello@flowandradiate.com)
- (b) In the cases where we have a contract with a customer, we have a contractual obligation.

## THIRD-PARTY SUPPLIERS

Where reasonable and practicable to do so, we will collect your Personal Data only from you. However, in some circumstances, we may be provided with information by third parties. We may use third party suppliers for management of specific services e.g. payment processing, and they may store some of your Personal Data to provide such service to you. In such a case we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party or that you can access your account to check this information directly yourself. We do not sell or pass your personal information onto third parties.

## CLIENT NOTES AND CLASSES

We take and keep notes online that contain personal information that may include sensitive information during your appointments. We store this written information in google documents. This document is

protected by our google account password. These documents will not be shared, passed or sold to any third party.

## BOOKINGS

We use Calendly Scheduling to manage our client bookings. This software may require you to complete the following information for your account: First name, Last name, email address and phone number. You may update the details in Acuity Scheduling at any time by emailing us.

## PAYMENT ONLINE

If you pay using an online transaction such as a credit or debit card we use Stripe for verification. These third-party payment facilitators are PCI DSS v 3.2.1 compliant to ensure your financial data is secure and we can never access your full payment details.

## THIRD-PARTY PROCESSORS

Where reasonable and practicable to do so, we will collect your Personal Data only from you. However, in some circumstances, we may be provided with information by third parties. We may use third party suppliers for management of specific services e.g. payment processing, and they may store some of your Personal Data to provide such service to you. In such a case we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party or that you can access your account to check this information directly yourself.

## DATA MANAGEMENT

We use the following third-party providers for our service to you. Their privacy policy is linked within as to how they handle data as part of the service we use. With all of the below suppliers you can ask us to review your stored data to ensure that it is accurate and best serves you.

Client records are not stored as paper documentation, however, a digital version is stored with Google Docs, clients are not identified by full name and proper care is taken to anonymise any and all individuals. Google provides a minimum security level to protect your Personal Data. We may keep your records on remote digital devices that are password protected.

- Communications with us via email are stored in our account with Google.
- To schedule appointments, we use Calendly by SquareSpace. You can opt out of this and manage your data in this system at any point by logging into the booking confirmation email.
- Payments for our services can use third party payment facilitators Stripe. Stripe is PCI DSS v 3.2.1 compliant to ensure your financial data is secure and we can never access your full payment details.
- Marketing from us may include:
  - Instagram is used by us. If you follow, like and interact with our social media account then your comments may be public depending on your personal privacy settings within that social media platform. Please check this if you are concerned about your privacy on any social media platform. Please let us know if you do not wish to be tagged in any of our posts.
  - We may conduct surveys using third parties to collect information in the survey to get an idea of the market. You do not have to participate, and you can choose to complete your name and email address or leave it anonymous.
  - Our mailing list service provider ensures that we only send emails to those who want to hear from us. We email on occasion with content relating to our services. You can unsubscribe at any time by clicking on the unsubscribe button in the emails sent.
- Our website is hosted by Squarespace. While using our website, we may ask you to provide us with certain personally identifiable information that might be collected through our website provider Squarespace. This includes a collection of your unique online electronic identifier; this is commonly known as an IP address, browser type, browser version, the pages of our website that you visit, the time and date of your visit, the time spent on those pages and other statistics.

## LINKS TO OTHER WEBSITES

Our services may include links to third party websites. When you click on this link you have left our website and services. We do not have control over what cookies or beacons or other technology these sites may use to track activity into their website, and do not have control over what data they may collect or their privacy policy. Use of their websites and clicking on those links is at your sole risk. We are not responsible for the protection and privacy of any information that you provide whilst visiting

such sites and these sites are not governed by this Privacy Policy. We suggest that you read their privacy statement before using the website.

We do not provide any personally identifiable customer information to these sites.

## DISCLOSURE OF PERSONAL DATA

We may release personal data where we believe that it is appropriate in a number of circumstances, including the following:

- Third parties where you consent to the use or disclosure;
- Where required or authorised by law;
- To enforce or apply our agreements with you;
- To protect the rights, property or safety of us, our clients or others; and
- With your consent following specific notice or request from us.

This includes fraud protection, but not selling, sharing or otherwise disclosing personally identifiable information from clients for commercial purposes in a way that is contrary to this Privacy Policy.

## SECURITY OF PERSONAL DATA

Your Personal Data is stored in a manner that reasonably protects it from misuse and loss and from unauthorised access, modification or disclosure. We do this abiding by the Data Acts as stated above.

When your Personal Data is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Data. However, most of the Personal Data is or will be stored in client files which will be kept by us for the Duration Period.

## DURATION PERIOD

If you have received Services with us we will store your data for seven years from your last appointment or purchase with us ("Duration Period"), as required by our insurers (First Act <http://www.hencilla.co.uk/unions/equity>) for any potential claims.

## ACCESS TO YOUR PERSONAL DATA & YOUR RIGHTS

You may request a copy of all data that we store about you at no cost at [hello@flowandradiate.com](mailto:hello@flowandradiate.com). In order to protect your Personal Data we may require identification from you before releasing the requested information. Repeated, unfounded or excessive requests may be challenged by us.

There are some circumstances that may limit the information that we can provide to you in a request, for example, public interest, law enforcement, legal and or health related matters.

Please also bear in mind that we rely on third parties for some of your information in the flow of data. It may take us the full calendar month permitted to provide a full response to your request.

Your rights in such a request include:

1. Your right to access - You have the right to ask us for copies of your personal information
2. Your right to rectification of errors - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete
3. Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances
4. Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
5. Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.
6. Your right to withdraw consent - You can withdraw your consent anytime by emailing us
7. Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.
8. Your right to object to marketing
9. Your right to complain to relevant data protection authority

## MAINTAINING THE QUALITY OF YOUR PERSONAL DATA



It is important to us that your Personal Data is up to date. We will take reasonable steps to make sure that your Personal Data is accurate, complete and up to date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

## INTERNATIONAL DATA TRANSFERS

Our services are available internationally. We control and manage Personal Data in England, UK. We may transfer data outside of the UK to our suppliers to provide the service to you. We ensure that their service meets the minimum requirements set out in the Privacy Laws. You can request to learn more about what data and which services may have access to your Personal Data.

## POLICY UPDATES

We reserve the right to update and amend this Privacy Policy at any time, effective upon posting an updated version on the Website. We will publish such updates on our website and may email notifications to you. Continued use of the Website after any such changes shall constitute your consent to such changes.

## PRIVACY POLICY COMPLAINTS AND ENQUIRIES

If you have any queries or complaints about our Privacy Policy please contact us at:

Viola Bruni at [hello@flowandradiate.com](mailto:hello@flowandradiate.com)

Should you have a complaint about the way that we have handled your Personal Data, you may submit this to the Information Commissioner's Office at <https://ico.org.uk/make-a-complaint/> or call their helpline at 0303 123 1113.

The ICO's address:

Information Commissioner's Office

Wycliffe House, Water Lane Wilmslow, Cheshire SK9 5AF

VERSION: July 8th 2022