



# PRIVACY POLICY

## 1. Introduction

At Crystal Balance, we take the collection and security of your information very seriously.

Part of our strategy for enforcing and maintaining this is by adhering to the requirements of the General Data Protection Regulation (GDPR) 2018. To do this we've updated our privacy policy, and we want to make sure you understand what these changes mean for you.

This privacy notice provides you with details of how we collect and process your personal data through your use of our site [www.crystalbalance.co.uk](http://www.crystalbalance.co.uk). We know that there's a lot of information here, but we want you to be fully informed about your rights, and explain how, as a responsible company, we use your data.

The Crystal Balance Company is the data controller and we are responsible for your personal data (referred to as "we", "us" or "our" in this privacy notice). By providing us with your data, you warrant to us that you are over 13 years of age.

## 2. What data we collect, for what purpose, and on what grounds we process it

Personal data means any information capable of identifying an individual. It does not include anonymised data. We may process the following categories of personal data about you:

- Communication Data that includes any communication that you send to us whether that be through the contact form on our website, through email, text, social media messaging, social media posting or any other communication that you send us. We process this data for the purposes of communicating with you, for record keeping and for the company, pursuance or defence of legal claims. Our lawful ground for this processing is our legitimate interests which in this case are to reply to communications sent to us, to keep records, and to establish, pursue or defend legal claims.

- Customer Data that includes data relating to any purchases of goods and/or services such as your name, title billing address, delivery address, email address, phone number, contact details and purchase details. For energy healing treatments we may ask for wider contact details and data relating to 'health' and this is kept in hard copy written form only and stored in a locked and secure vessel. This is for the purpose of complying with our insurance requirements. We process this data to supply the goods and/or services you have purchased and to keep records of your transactions. Our lawful ground for this processing is the performance of a contract between you and us and/or taking steps at your request to enter into such a contract. Purchases made on this website are transacted through PayPal at your discretion. Any information you provide to PayPal will be subject to their privacy policy, rather than this Privacy Policy. We are not responsible for PayPal's use of information
- User Data that includes data about how you use our website and any online services together with any data that you post for publication on our website or through other online services. We process this data to operate our website and ensure relevant content is provided to you, to ensure the security of our website, to maintain back- ups of our website and/or databases and to enable publication and administration of our website, other online services and business. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business.
- Marketing Data that includes data about your preferences in receiving marketing from us and your communication preferences. We process this data to enable you to partake in our promotions such as special offers, to deliver relevant website content and to measure or understand the effectiveness of this advertising. Our lawful ground for this processing is our legitimate interests which in this case are to study how customers use our products/services, to improve services, to grow our business, and to decide our marketing strategy.
- Technical Data that includes data about your use of our website and online services such as your IP address, your login data, details about your browser, length of visit to pages on our website, page views and navigation paths, details about the number of times you use our website, time zone settings and other technology on the devices you use to access our website. The source of this data is from our analytics tracking system. We process this data to analyse your use of our website and other online services, to administer and protect our business and website, and to understand the effectiveness of our advertising. Our lawful ground for this processing is our legitimate interests, which in this case are to enable us to properly administer our website and company, to grow our business, and to decide our marketing strategy.
- We may use Customer Data, User Data, Technical Data and Marketing Data to deliver relevant website content and advertisements to you (including Facebook adverts or other display advertisements) and to measure or understand the effectiveness of the advertising we provide. Our lawful ground for this processing is legitimate interests which is to grow our business. We may also use such data to send other marketing communications to you. Our lawful ground for this processing is either consent or legitimate interests.

## **Sensitive Data**

We do not collect any Sensitive Data about you apart from certain health data which is in written format held in hard copy only (our registration form) for energy healing treatments. This comprises of medical history, ailments and doctor's contact details – these are to comply with our insurance provider. We require your explicit consent for processing sensitive data, so when you submit your details, we will send you a further communication asking for you to confirm your consent to this processing. Sensitive data refers to data that includes details about your race or

ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We do not collect any information about criminal convictions and offences.

Where we are required to collect personal data by law, or under the terms of the contract between us, and you do not provide us with that data when requested, we may not be able to perform the contract (for example, to deliver goods or services to you). If you don't provide us with the requested data, we may have to cancel a product or service you have ordered but if we do, we will notify you at the time.

We will only use your personal data for a purpose it was collected for or a reasonably compatible purpose if necessary. In case we need to use your details for an unrelated new purpose we will let you know and explain the legal grounds for processing. We may process your personal data without your knowledge or consent where this is required or permitted by law.

### **3. How we collect your personal data**

We may collect data about you by you providing the data directly to us (for example by filling in forms on our site, completing hard copy registration forms for energy healing purposes or by sending us emails).

We may receive data from third parties such as analytics providers such as Google based outside the EU, advertising networks such as Facebook based outside the EU, such as search information providers such as Google based outside the EU, providers of technical, payment and delivery services, such as data brokers or aggregators. We may also receive data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

### **4. Marketing communications**

Our lawful ground of processing your personal data to send you marketing communications is either your consent or our legitimate interests, which is to grow our business.

Under the Privacy and Electronic Communications Regulations, we may send you marketing communications from us if (i) you made a purchase or asked for information from us about our goods or services or (ii) you agreed to receive marketing communications and in each case you have not opted out of receiving such communications since. Under these regulations, if you are a limited company, we may send you marketing emails without your consent. However, you can still opt out of receiving marketing emails from us at any time.

Before we share your personal data with any third party for their own marketing purposes we will get your express consent. You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you, or by contacting us. If you opt out of receiving marketing communications this opt-out does not apply to personal data provided as a result of other transactions, such as purchases, warranty registrations etc.

### **5. Disclosures of your personal data**

We may have to share your personal data with the parties set out below:

- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers.

- Government bodies that require us to report processing activities.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.
- We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

## 6. International

We are subject to the provisions of the General Data Protection Regulations that protect your personal data. Where we transfer your data to third parties outside of the EEA, we will ensure that certain safeguards are in place to ensure a similar degree of security for your personal data. As such:

We may transfer your personal data to countries that the European Commission have approved as providing an adequate level of protection for personal data by; or

Where we use certain service providers who are established outside of the EEA, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe.

If none of the above safeguards is available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

## 7. Data security

We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. We also allow access to your personal data only to those employees and partners who have a business need to know such data. They will only process your personal data on our instructions and they must keep it confidential.

We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach if we are legally required to.

## 8. Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. When deciding what the correct time is to keep the data for we look at its amount, nature and sensitivity, potential risk of harm from unauthorised use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.

For tax purposes the law requires us to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they stop being customers. To adhere to insurance regulations for energy healing, the requirement is to retain information which is in hard copy form for 7 years following the last occasion on which a treatment was provided. In the case of treatment to minors, records should be kept at least 7 years after they reach the age of majority (18). Provisions are made for secure erasure and incineration of the data after this time period.

In some circumstances we may anonymise your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 9. Your legal rights

Under data protection laws you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent.

You can see more about these rights at the website of the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues: [www.ico.org.uk](http://www.ico.org.uk).

If you wish to exercise any of the rights set out above, please contact us. 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, or refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the ICO. We request that you contact us first if you do have a complaint so that we can try to resolve it for you.

## 10. Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## 11. Cookies

Cookies are bits of information (memory files) stored in your browser by sites you visit. As is common practice with almost all websites, this site uses cookie to improve your experience by remembering your preferences and enable other cookie-based features (e.g. analytics).

### **Our Cookies**

When you submit data through a form such as those found on contact pages or comment forms, cookies may be set to remember your user details for future correspondence.

In order to provide you with a better experience and remember your preferences, we need to set cookies so that this information can be called whenever you interact with a page.

### **Third-Party cookies**

In special cases, we also use cookies provided by trusted third parties like Google Analytics.

Third party analytics are used to track and measure usage of this site so that we can continue to produce engaging content.

### **How to Disable Cookies**

Most browsers let you refuse to accept cookies. See your browser Help or Tool for how to do this. Be aware that disabling cookies may affect the functionality of this and many other websites you visit. Therefore, it is recommended that you do not disable cookies.

### **Changes to this privacy notice**

This privacy notice was published on 24th April 2018 and last updated on 24th April 2018

We may change this privacy notice from time to time. You should check this policy occasionally to ensure you are aware of the most recent version.

## **Contact Details**

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by contacting us. Please contact us if you have any questions about this privacy notice or the information we hold about you. If you wish to contact us, please send an email, write or phone us as below:

- Legal entity: The Crystal Balance Company
- Postal address: The Crystal Balance Company, 20 Waterside, Mundeford, Christchurch, Dorset BH23 3NZ, United Kingdom.
- Email address: [info@crystalbalance.co.uk](mailto:info@crystalbalance.co.uk)