

Luxeclinics Privacy Policy

Introduction

Luxeclinics is a controller for the purposes of the Data Protection Act 1998 and the EU General Data Protection Regulation 2016/679 which means that we are responsible for, and control the processing of, the personal information you provide to us when contacting us and using our website in accordance with this privacy policy. Luxeclinics works in partnership with Elite Aftercare so your personal information is shared equally (“we”, “us” or “Elite Aftercare”). When we refer to “Luxeclinics” we refer to both companies.

Luxeclinics understands that customers care about the use and storage of their personal information and we value your trust in allowing us to do this in a careful and sensible manner. We have created this privacy policy statement to demonstrate our commitment to the privacy of our customers.

By using Luxeclinics, our websites, our social media pages, and any other Luxeclinics services, you are acknowledging that we are processing your personal information and, where necessary consenting to such practices, as outlined in this statement.

Personal information which we collect

We collect personal information about you (and others if their personal information is provided by you) when you:

- (a) enquire about a procedure;
- (b) make a booking with our patient coordinator;
- (c) calling our telephone helpline (which may be recorded);
- (d) post material to our website and / or social media page;
- (e) complete customer feedback or surveys as part of your stay;
- (f) register at the hospital reception;
- (g) raise a complaint or dispute with us or are involved in a legally recordable incident at our premises (e.g. in relation to health and safety reporting);
- (h) speak to one of our representatives, call centre agents or members of our customer services or PR team;
- (i) participate in competitions or promotions;
- (j) and / or use our website and customer applications in any other way.

The personal information collected in the above manner may include the following about you (and others if their personal information is provided by you):

- (a) full name;
- (b) postal address;
- (c) email address;
- (d) telephone number;
- (e) payment details;
- (f) geo-location;
- (g) medical, lifestyle (smoking habits, alcohol consumption) and health information;
- (h) supplementary information (dietary and other preferences and special requirements);
- (i) nationality;
- (j) emergency contacts;
- (k) personal information (date of birth, height, weight, gender);
- (l) identification information (such as passports, drivers’ licences or national identity cards); and
- (m) assessment and post operation photos;

Personal information provided by third parties

We may also obtain information about you from social media providers such as Twitter, Instagram and Facebook or from third party websites where you have left commentary or feedback about us (for example on Instagram).

How we use your information

We will collect personal information:

1) in order to take the necessary steps in preparation of, or to fulfill our obligations under, a booking contract:

- a) **Bookings and payments** – provide communications about bookings, products and services being provided to you (and others if their personal information is provided by you);
- b) **Bookings and account updates** – send details of new, amended or cancelled bookings– usually via email or text messages;
- c) **Update you on matters affecting your booking** – contact you (and others if their personal information is provided by you) in the event of a change that affects a booking or any data or personal information you have provided us with, such as changes to terms and conditions of booking or this privacy policy;
- d) **Website service communication** – provide notifications of any changes to our website or to our services that may affect you (and others if their personal information is provided by you);
- e) **Customer service communication** – provide you with requested information or correspondence, such as response from us to an enquiry made by you;
- f) **To provide assistance in completing bookings** – send reminder emails to continue with a booking which is in your “basket” but is not paid and completed;
- g) **Maintain your Luxeclinics profile or business accounts** – create a profile about you in relation to your booking, to update our records, create and maintain your account.

2) with your consent:

- a) **Maintain records indicating your consent to status** – to ensure we accurately reflect your wishes when communicating to you;

3) in our legitimate interest* improve our services:

- a) **Market research** – to contact you (and others if their personal information is provided by you) to ask about the experience using our services as part of a continual programme of customer service improvement. This is not marketing communication. We may use third parties for example Feefo to provide such market research communications to you on our behalf;
- b) **Customer support** – monitor calls and help train staff in relation to our customer support and helpdesk function;
- c) **Product and service improvement** – to improve our product and services;

4) in our legitimate interest* to protect against fraud:

- a) **Website improvement and fraud prevention** – improve our websites, prevent or detect fraud or abuses of our websites and enable third parties to carry out technical, logistical or other functions on our behalf;

5) in order to meet our legal obligations:

- a) **Taxation** – ensure we meet our tax and other regulatory obligations;
- b) **Registration** – ensure local jurisdiction regulations are complied with (where registration is necessary in such jurisdictions).

* any reliance on legitimate interest shall not prejudice your interest or fundamental rights and freedoms.

How long we will keep your personal information

We retain your information for a range of purposes which determine the period of time for which we need to keep such information. For example (list is not exclusive):

Data	Retention Period
Recorded telephone conversations	7 days from the day of call received
For the purposes of initial enquiry	3 years from the point of last contact with you, this may include use of our websites, stays in our villas or responses to communications with you
For compliance with legal obligations arising from contracts entered into with you, for example tax regulations	7 years from date of last transaction

We will remove your data from our systems at the end of the applicable data retention periods, unless we are required by current or future law to retain your personal information for a longer period.

Our approach to information security

To protect your information, Luxeclinics has policies and procedures in place to make sure that only authorised personnel can access the information, that information is handled and stored in a secure and sensible manner and all systems that can access the information have proportionate and reasonable security measures in place. To achieve this, employees, contractors, sub-contractors and third party suppliers have contracts, with defined roles and responsibilities.

While we take commercially reasonable measures to ensure the safety and security of your data, due to the inherent risks with the Internet, we are unable to warrant the absolute security of your data when using our services.

Transfers of your information out of the EEA

We need to transfer your personal information to the surgeons, hospitals and Elite Aftercare support team which are located outside the European Economic Area, for the purpose of assessing suitability and to fulfill the services that you (and others if their personal information is provided by you) have booked in for. Any transfer of your data will be subject to adequate levels of protection that will safeguard your privacy rights and give you remedies in the unlikely event of a security breach.

Your rights

In order to process any of the requests listed below, we may need to verify your identity for your security. In such cases your response will be necessary for you to exercise this right.

The right to access information we hold about you

At any point you can contact us to request details concerning the information we hold about you, why we have that information, who has access to the information and where we got the information. In most cases you may be entitled to copies of the information we hold concerning you. Once we have received your request we will respond within 30 days.

The right to correct and update the information we hold about you

If the data we hold about you is out of date, incomplete or incorrect, you can inform us and we will ensure that it is updated.

The right to have your information erased

If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase the data we hold. When we receive your request, we will confirm whether the data has been deleted or tell you the reason why it cannot be deleted.

The right to object to processing of your data

You have the right to request that Luxeclinics stops processing your data. Upon receiving the request, we will contact you to tell you if we are able to comply or if we have legitimate grounds to continue. If data is no longer processed, we may continue to hold your data to comply with your other rights.

Please note it is not possible to 'opt-out' of receiving communication from us which relates to your bookings or customer satisfaction surveys sent as part of the booking (which are not considered marketing for these purposes). This ensures that we can always contact you as a result of circumstances that may affect your stay with us and in order for us to improve our services going forward.

The right to data portability

You have the right to request that we transfer your data to another controller. Once we have received your request, we will comply where it is feasible to do so.

The right to complain

You can make a complaint to us by contacting us admin@luxeclinics.org or to the data protection supervisory authority – in the UK, this is the Information Commissioner’s Office, at <https://ico.org.uk/>.

Consent

In those cases where we need your consent to process your information, we will ask you to make a positive indication (e.g. to tick a box or insert your contact details on the relevant form or web page requiring consent). By actively providing us with your consent, you are stating that you have been informed as to the type of personal information that will be processed, the reasons for such processing, how it will be used, for how long it will be kept, who else will have access to it and what your rights are as a data subject and that you have read and understood this privacy policy.

Sharing your information

The information and data we collect is important for Luxeclinics and we understand that you care about the use and storage of your personal information we value your trust in allowing us to do this. We would not want to share this with anyone else unless we have your express consent, we will never disclose, rent, trade or sell your personal information to any third parties for their marketing purposes.

We do disclose or transfer your data or personal information to other companies, data processors or agents employed by us to perform any necessary functions on our behalf (such as hosting and maintaining our website, providing us with data management systems, market research, customer satisfaction surveys and support services), but they are bound by similar terms to those set out in our privacy policy and may not use this information for their own purposes.

In the event that Luxeclinics or any part of its business is sold to or integrated with another business, Luxeclinics may disclose your personal information to the new owners (and their professional advisers on the transaction) to be used by the new owners and their group of companies in the same ways as set out in this privacy policy, including to continue providing you with the same services and marketing information services as are currently provided by Luxeclinics.

Use of cookies

The Luxeclinics websites and mobile app use cookies and tags. A cookie is a small text file that can be stored by your browser on the device you use to access internet and allows the browser to pass small amounts of information about user behaviour on the given website to a web server. Tags are pieces of code that exist on web pages and collect information about usage of the web pages.

At Luxeclinics we use our own cookies and tags as well as those from third parties to enable the smooth operation of the websites. We also use cookies/tags to monitor visits to our website and continuously look for places to improve your website experience. We will never share any personal information about you with these third parties and the cookies and tags used maintain your anonymity.

Cookie Consent

The first time you access a Luxeclinics website, you will be informed about our use of cookies to improve your site experience. By continuing to browse our website you consent to our use of cookies.

Description of cookies

Cookie Type	Example	Details
Analytics	Google Analytics	These cookies give us critical information about various pages on the websites and how our users interact with them. We use this information to improve the performance of our website and the information presented to users

How to reject and delete cookies

Should you wish to reject or block the use of cookies, you can do so at any time, usually by clicking ‘Help’ on your browser. Cookies are specific to individual browsers so if you use more than one browser, you will need to delete cookies on each browser. Please be aware though that by rejecting cookies you may not receive the optimum website experience.

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.allaboutcookies.org.

Contact details

If you have any queries about this policy, need further information or wish to lodge a complaint you can use the details below to contact us.

LuxeclinicsLtd
20-22 Wenlock Road
London
N7 7GU

admin@luxeclinics.org

Changes to this Privacy Policy

We may change this policy from time to time. You should check this policy occasionally to ensure that you are aware of the most recent version that will apply each time you access the website.