

Privacy Policy

Privacy Notice – Overview

This privacy notice explains how and why Thérapie Clinic collects, uses, stores and shares personal data when you visit our website, book or receive a treatment, contact us, or otherwise deal with us.

Personal data is information that identifies you, or could be used to identify you, such as your name, contact details, payment information, health information or information about how you use our website.

We will process your personal data fairly, lawfully and transparently. We use it to:

- provide the treatments and services you ask for
- keep you safe and record your care
- run and improve our business and services
- send you marketing, where you have agreed or where the law otherwise allows
- meet our legal and regulatory obligations

If you have any questions about this notice, please contact us at privacy@therapieclinic.com.

Who We Are

Thérapie Clinic operates clinics in Ireland, Great Britain, Northern Ireland and the United States. The company responsible for your personal data (the “data controller”) depends on where you are treated or which of our services you use:

- **Ireland:** Valterous Ltd., registered with the CRO in Ireland under number 477480
- **Great Britain and Northern Ireland:** Therapie Medical (UK) Limited, registered in England and Wales under number 10181501
- **United States:** Therapie Medical (US) Inc, Delaware.

In this notice, “Thérapie”, “we”, “us” and “our” means the relevant company above.

The Personal Data We Collect

Depending on how you deal with us, we may collect the following personal data.

Identity and contact details: your name, date of birth, sex, email address, phone number and home address.

Appointment and account details: your bookings, attendance, treatment plans, preferences, and any correspondence with us.

Payment and transaction details: records of payments, invoices, packages and refunds. Card payments are handled by our payment providers, and we do not store your full card details.

Health information: before and during your treatment, we ask for information about your health so that we can make sure a treatment is safe and suitable for you. This may include:

- medical history, including current and previous medical treatments, surgeries and pregnancies
- skin conditions and allergies
- medication, including creams and other products you use
- consultation notes, treatment notes and consent forms
- details of the products used in your treatment, such as batch numbers
- before and after photographs of the treated area

Health information is a “special category” of personal data under data protection law, and we protect it accordingly.

Website and technical data: your device’s IP address, browser type, the pages you visit, the website that referred you to us, and the times of your visits. We collect some of this using cookies and similar technologies. See our [Cookie Policy](#) for details.

Marketing and feedback: your marketing preferences, your responses to surveys, and any reviews or feedback you give us.

Job applicants: if you apply for a role with us, the information in your application, such as your CV and employment history.

Children

Our website is not intended for children under 16, and we do not knowingly collect personal data from them through it. Where we treat clients under 18, we do so only with the consent of a parent or guardian, and only for treatments that are suitable for their age.

How We Collect Your Data

We collect personal data:

- directly from you, when you book an appointment, complete a consultation or medical questionnaire, receive a treatment, make a purchase, contact us, leave a review or apply for a job
- automatically, when you use our website, through cookies and similar technologies
- from third parties, including:
 - analytics and advertising providers such as Google and Meta, where you have consented to cookies
 - social media platforms, when you interact with us or log in through them
 - payment and fraud prevention providers
 - affiliate networks through which you reached our website

How We Use Your Personal Data and Our Legal Basis

We only use your personal data where the law allows us to. The legal basis depends on the purpose.

What we use your data for	Our legal basis
Booking and managing appointments, providing your treatment, taking payment and providing customer service	Performance of our contract with you

What we use your data for	Our legal basis
Sending you appointment reminders and service messages	Performance of our contract with you
Keeping accounting and tax records, and meeting other legal and regulatory requirements	Legal obligation
Preventing fraud, keeping our systems secure and protecting our business	Our legitimate interests in running a safe and secure business
Handling complaints and responding to, or defending, legal claims	Our legitimate interests in protecting our business and resolving disputes
Improving our services, and business analysis using anonymised or aggregated data where possible	Our legitimate interests in understanding and improving our business
Sending you marketing by email, SMS or other electronic means	Your consent or, where the law allows, our legitimate interests in marketing similar services to existing clients who have not opted out
Personalised advertising, including showing Thérapie adverts to you as you browse the internet, and sharing hashed contact details with advertising platforms to show you relevant adverts	Our legitimate interests in promoting our services in a way you would reasonably expect as part of running our business, or your consent where the law requires it. You can object to this, or withdraw your consent, at any time.
Using before and after photographs in marketing or on social media	Your explicit consent, which is separate from your treatment consent
Assessing job applications	Taking steps at your request before entering a contract, and our legitimate interests in recruiting

Health information

We ask for, and use, your health information to provide the healthcare treatments you ask us for. We use it to assess whether a treatment is safe and suitable for you, to carry out the treatment, and to record and follow up your care.

Our legal basis is that this is necessary for the provision of health care or treatment (Article 9(2)(h) of the GDPR and UK GDPR). This processing is carried out by or under the responsibility of healthcare professionals who are bound by a duty of confidentiality. It is supported by section 52 of the Data Protection Act 2018 (Ireland) and Schedule 1, paragraph 2 of the Data Protection Act 2018 (UK).

Where a treatment is not provided by, or under the supervision of, a healthcare professional, we ask for your explicit consent to use your health information (Article 9(2)(a)). You can withdraw this consent at any time, but we may then be unable to provide that treatment safely.

After your treatment, we keep your health information where this is necessary to establish, exercise or defend legal claims (Article 9(2)(f)).

We do not use your health information for marketing or advertising.

Automated decision-making

We do not make decisions about you based solely on automated processing that have legal or similarly significant effects on you.

How We Share Your Data

We only share your personal data where necessary, and we require anyone who handles it on our behalf to keep it secure and use it only for the purposes we specify. We may share it with:

- **Service providers** who help us run our business, including our clinic management and booking system, IT and cloud hosting providers, payment processors, communications and marketing platforms, customer survey providers and our privacy centre provider. A list of our sub-processors is available on our List of Data Sub-Processors page.
- **Advertising and analytics partners**, such as Google and Meta, on the basis of our legitimate business interests or, where the law requires it, your consent, and in line with the practices explained in their terms and privacy notices. To protect your personal data, contact details we share with these platforms are pseudonymised using a hashing algorithm (converted into a coded form) at the point of sharing. You can object to this, or withdraw your consent, at any time through the Privacy Centre or by contacting us.
- **Fraud prevention providers**, for online sales. They may share information with other organisations involved in fraud prevention, including law enforcement, and may keep a record of it.
- **Professional advisers**, including lawyers, auditors, bankers and insurers.
- **Healthcare professionals** involved in your care, where needed for your safety or with your agreement.
- **Regulators, government bodies, law enforcement and courts**, where the law requires it or where it is necessary to establish, exercise or defend legal claims.
- **Other Thérapie group companies**, where needed to provide our services or run our business.
- **A buyer or successor**, if all or part of our business is sold or restructured, subject to equivalent protections.

We do not sell your personal data.

Marketing Preferences, Adverts and Cookies

Your marketing preferences

We may send you news and offers about our services by email, SMS or other channels where you have agreed to receive them. Where the law allows, we may also contact existing clients about similar services unless they have opted out.

We may use information about the services you have had or shown interest in to tailor the offers we send you. We never use your health information for this.

You can opt out at any time:

- by using the unsubscribe link in any marketing email, or following the opt-out instructions in any SMS

- by managing your preferences in the Thérapie Privacy Centre
- by contacting us at privacy@therapieclinic.com

We will process opt-out requests as quickly as possible, but it may take a few days for them to take full effect.

Cookies and advertising

Our website uses cookies and similar technologies. Some are strictly necessary for the website to work. We only use cookies for analytics or advertising where you have consented or, where the law allows, where you have not objected. You can change your choices at any time by clicking Manage Cookies in the Privacy Centre, or by adjusting your browser settings. See our [Cookie Policy](#) for details.

We use analytics and advertising tools, such as Google Analytics and Meta advertising tools, to understand how our website is used, to show you relevant content and adverts, and to measure how effective our marketing is. We do this on the basis of our legitimate business interests or, where the law requires it, your consent. Where these tools use cookies, we follow your cookie choices. You can opt out of personalised advertising at any time in the Privacy Centre.

Links to other websites

Our website may link to other websites, including social media platforms and partners. These sites have their own privacy policies, and we are not responsible for them.

International Transfers

Some of our service providers, or their staff, are based outside the European Economic Area (EEA) and the UK, including in the United States. Personal data may also move between our group companies in Ireland, the UK and the US.

Where personal data is transferred outside the EEA or the UK, we make sure it is protected by an appropriate safeguard, such as:

- a decision by the European Commission or the UK Government that the destination country provides adequate protection, including the EU–US Data Privacy Framework and its UK Extension, for US organisations certified under it
- Standard Contractual Clauses approved by the European Commission, with the UK International Data Transfer Addendum where UK data is involved, or the UK International Data Transfer Agreement

For more information on the countries we transfer data to and the safeguards we use, contact us at privacy@therapieclinic.com.

How Long We Keep Your Data

We only keep your personal data for as long as we need it for the purposes described in this notice, including to meet legal obligations, resolve disputes and defend legal claims.

Client and treatment records. We keep your client record, including your health information, treatment notes, consent forms, photographs and payment history, for as long as you are a client of ours. After

your last treatment, we keep it for as long as we may need it to respond to questions, complaints or legal claims about your care.

Some effects of aesthetic treatments may not become apparent until long after treatment, and the law allows claims to be brought from when a person becomes aware of an issue rather than from the date of treatment. For this reason, the period after your last treatment is measured in years rather than months. We set it by reference to:

- the time limits within which legal claims can be brought in the country where you were treated
- recognised guidance on keeping health records
- the requirements of our insurers
- any legal or regulatory requirement to keep records for longer

If you return for further treatment, the period starts again from your most recent treatment.

Financial records. We keep these for as long as tax and accounting laws require.

Marketing data. We use your details for marketing until you opt out or withdraw your consent. After that, we keep a record of your choice so that we do not contact you again by mistake.

Enquiries and job applications. We keep these for as long as needed to deal with your enquiry or complete the recruitment process, and to respond to any related questions or claims.

Longer retention. If there is an ongoing complaint, claim or investigation, or the law requires it, we keep the relevant records until the matter is resolved or the requirement ends.

When we no longer need your personal data, we securely delete it or anonymise it so that it can no longer be linked to you. We may use anonymised information for business analysis.

Keeping Your Data Secure

We use appropriate technical and organisational measures to protect your personal data against loss, misuse and unauthorised access. These include encryption, access controls that limit who can see health information, and regular review of our security arrangements. Communication between your browser and our website is encrypted.

We require our service providers to have appropriate security in place and to use your personal data only for the purposes we specify.

No method of transmitting or storing data is completely secure. If a personal data breach occurs that is likely to affect you, we will notify you and the relevant regulator where the law requires us to.

Your Rights

Depending on where you live, you have some or all of the following rights. Some rights apply only in certain circumstances.

- **To be informed** about how we use your personal data, which is the purpose of this notice.
- **Access:** to obtain a copy of the personal data we hold about you.
- **Rectification:** to have inaccurate or incomplete personal data corrected.

- **Erasure:** to have your personal data deleted where we no longer have a valid reason to keep it. We may be unable to delete treatment records that we need to keep for legal reasons, and we will explain why if so.
- **Restriction:** to ask us to limit how we use your personal data, for example while we check its accuracy.
- **Portability:** to receive personal data you have given us in a structured, machine-readable format, or to have it transferred to another organisation, where we process it by automated means on the basis of your consent or a contract.
- **Objection:** to object to processing based on our legitimate interests, and to object at any time to direct marketing.
- **Withdraw consent:** where we rely on your consent, you can withdraw it at any time. This does not affect processing that took place before you withdrew it.
- **Automated decisions:** not to be subject to decisions based solely on automated processing that have legal or similarly significant effects on you.

You can exercise your rights through the Thérapie Privacy Centre or by emailing privacy@therapieclinic.com. We may need to verify your identity before responding. We will respond within one month, or tell you if we need longer for a complex request, as the law allows.

Complaints

If you have concerns about how we handle your personal data, please contact us first at privacy@therapieclinic.com so that we can try to resolve them. [For UK clients: we will acknowledge your complaint within 30 days and keep you informed of our progress.]

You also have the right to complain to the data protection regulator:

- **Ireland and the EU:** the Data Protection Commission (www.dataprotection.ie)
- **Great Britain and Northern Ireland:** the Information Commissioner's Office (www.ico.org.uk)
- **United States:** the relevant state Attorney General

If you are in the United States

[Our clinics in New York are operated by [US legal entity name]. Where US federal or state law gives you rights over your personal information, you can exercise them by contacting us at privacy@therapieclinic.com, and we will not discriminate against you for doing so.] [Confirm whether HIPAA or any state privacy law applies to our US business, and add a supplementary US notice if required.]

Changes to This Privacy Notice

We may update this notice from time to time. If we make significant changes, we will post the updated notice on our website and, where appropriate, notify you by email.

How to Contact Us

If you have any questions about this notice or your personal data, please contact us:

Email: privacy@therapieclinic.com

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