

VIP Empowerment Customer Privacy Notice

This privacy notice tells you what to expect us to do with your personal information.

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Contact details

Email: vie@vipempowerment.co.uk

What information we collect, use, and why.

We collect or use the following information to **provide and improve products and services for clients**:

- Names and contact details
- Addresses
- Pronoun preferences
- Occupation
- Date of birth
- Payment details (including card or bank information for transfers and direct debits)
- Transaction data (including details about payments to and from you and details of products and services you have purchased)
- Usage data (including information about how you interact with and use our website, products and services)
- Health information (such as medical records or health conditions)
- Video recordings
- Audio recordings (eg calls)
- Records of meetings and decisions

- Account access information
- Website user information

We also collect or use the following special category information to **provide and improve products and services for clients**.

This information is subject to additional protection due to its sensitive nature:

- Health information
- Sexual orientation information

We collect or use the following personal information for the **operation of client or customer accounts**:

- Names and contact details
- Addresses
- Purchase or service history
- Account information, including registration details
- Marketing preferences

We also collect or use the following special category information for the **operation of client or customer accounts**. This information is subject to additional protection due to its sensitive nature:

- Health information
- Sexual orientation information

We collect or use the following personal information for **information updates or marketing purposes**:

- Names and contact details
- Addresses
- Profile information
- Marketing preferences
- Purchase or account history
- Website and app user journey information

We collect or use the following personal information to **comply with legal requirements**:

- Name

- Contact information
- Client account information
- Any other personal information required to comply with legal obligations
- Safeguarding information

We also collect or use the following special category information to **comply with legal requirements**. This information is subject to additional protection due to its sensitive nature:

- Health information

We collect or use the following personal information to **protect client welfare**:

- Names and contact information
- Client account information
- Health and wellbeing information
- Emergency contact details

We also collect or use the following special category information to **protect client welfare**. This information is subject to additional protection due to its sensitive nature:

- Health information

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Addresses
- Payment details
- Account information
- Purchase or service history
- Customer or client accounts and records
- Financial transaction information
- Correspondence

Lawful bases and data protection rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible [lawful bases](#) in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [Read more about the right of access.](#)
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [Read more about the right to rectification.](#)
- **Your right to erasure** - You have the right to ask us to delete your personal information. [Read more about the right to erasure.](#)
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [Read more about the right to restriction of processing.](#)
- **Your right to object to processing** - You have the right to object to the processing of your personal data. [Read more about the right to object to processing.](#)
- **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. [Read more about the right to data portability.](#)
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. [Read more about the right to withdraw consent.](#)

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide and improve products and services for clients** are:

- Consent - we have permission from you after we give you all the relevant information. All your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we must collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - We collect and use personal information to deliver and improve our professional services. This includes contact, booking, and relevant health details needed to provide safe, personalised care and manage appointments effectively. Processing this information helps us maintain professional standards, ensure client safety, and offer consistent, high-quality experience. The benefits to clients- such as tailored support and clear communication- outweigh any minimal privacy risks, which are reduced through secure storage and limited access.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for the **operation of client or customer accounts** are:

- Consent - we have permission from you after we give you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - We process personal information to manage and operate client accounts efficiently. This allows us to record bookings, payments, treatment or service preferences, and communication history to deliver a smooth and reliable service. The processing is necessary to maintain accurate records, provide ongoing support, and meet professional and legal obligations. Any impact on privacy is minimal and outweighed by the benefits of accurate account management and a consistent client experience.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for **information updates or marketing purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply,

except the right to object. To be clear, you do have the right to withdraw your consent at any time.

- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - Our lawful basis for collecting and using personal information for information updates or marketing is consent. We only send marketing communications, newsletters, or service updates to individuals who have actively chosen to receive them. Clients can withdraw their consent or update their preferences at any time. This ensures transparency and respects individuals' privacy while allowing us to share relevant news, offers, and wellbeing information that may benefit them.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information to **comply with legal requirements**:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information to **protect client welfare** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Vital interests – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:

- Our lawful basis for collecting or using personal information to deal with queries, complaints, or claims is legitimate interests. We need to use relevant client information to respond effectively, resolve issues, and maintain high professional standards. In some cases, processing may also be necessary to meet a legal obligation or defend legal claims. Information is handled fairly and only used to the extent required to investigate and address the matter appropriately.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Where we get personal information from

- Directly from you

How long we keep information

7 Years.

For more information on how long we store your personal information or the criteria we use to determine this please contact us using the details provided above.

Who we share information with

Others we share personal information with

- Emergency services
- Organisations we're legally obliged to share personal information with

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

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