

# NATURA SANCTUARY

## *Privacy Policy*

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Effective from 18<sup>th</sup> April 2026. This policy explains how we collect, use, store, and protect your personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Last updated: [DATE]

## 1. About Us

This Privacy Policy explains how Natura Sanctuary collects, uses, stores, and protects your personal data when you visit our website (naturasanctuary.co.uk), enquire about our services, or participate in our workplace wellbeing programmes.

**Data Controller:** For personal data collected through this website and our direct client relationships, we are the data controller.

**Data Processor:** For employee wellbeing survey data collected on behalf of a client organisation, we act as a data processor under a separate Data Processing Agreement.

**Data Protection Contact:** Natura Sanctuary, [peace@naturasanctuary.com](mailto:peace@naturasanctuary.com)

**ICO Registration Number:** [to be confirmed] register at [ico.org.uk](http://ico.org.uk) if processing personal data as a business]

## 2. Information We Collect

### 2.1 Information you provide directly

- Contact details: name, email, phone number, job title, organisation when you submit our contact form, book a discovery call, email us, or speak with us by phone
- Enquiry content: the subject and content of messages you send us
- Client engagement data: information provided during a commissioned engagement including site visit notes, design preferences, programme requirements, feedback, and correspondence
- Wellbeing survey responses: if you participate in a workplace wellbeing survey delivered as part of a programme we run for your employer, we collect your survey responses which may include self-reported information about stress, sleep, mental wellbeing, and coping behaviours
- Workshop and session attendance: your name, date of attendance, and any feedback provided after workshops, training sessions, or drop-in sessions
- Testimonials and case study content: if you agree to provide a testimonial or participate in a case study, we collect the content you provide and your name and job title for attribution
- Newsletter subscription: your name and email address if you subscribe to our mailing list

### 2.2 Information collected automatically

- Technical data: IP address (anonymised where possible), browser type and version, operating system, device type, screen resolution, time zone, and general location (city/region level derived from IP)
- Usage data: pages visited, time and date of visit, time spent on each page, navigation paths, referring URL, exit pages, and scroll depth

- Cookie data: information collected through cookies and similar technologies as described in our separate Cookie Policy

### 2.3 Information we receive from third parties

- Referral information: if a client, partner, or colleague refers you to us, they may share your name, email, and a brief description of your needs. We will contact you to introduce ourselves and will not retain your data if you do not wish to engage
- Publicly available information: we may review publicly available information (LinkedIn profiles, company websites) to prepare for client meetings. We do not store this information in our systems

### 2.4 Information we do not collect

- Payment card details: we do not collect or store card information. Payments are processed through [STRIPE / BANK TRANSFER]
- Biometric data: we do not collect fingerprints, facial recognition data, or any biometric identifiers
- Criminal records data: we do not collect data relating to criminal convictions or offences

## 3. Lawful Basis for Processing

Under UK GDPR, we must have a lawful basis for each type of processing we carry out. The table below sets out how we use your data and the legal basis for each.

Purpose	Data Used	Lawful Basis (Article 6)	Additional Condition (Article 9, if applicable)
Responding to enquiries via contact form, email, or phone	Name, email, phone, organisation, message content	Art. 6(1)(f) — Legitimate interests	N/A
Providing a quote or proposal	Contact details, site details, requirements	Art. 6(1)(b) — Pre-contractual steps	N/A
Delivering contracted services (design, build, programme)	Contact details, site data, programme participation	Art. 6(1)(b) — Contract performance	N/A
Conducting wellbeing surveys	Survey responses inc. stress, sleep, wellbeing, coping	Art. 6(1)(a) — Consent	Art. 9(2)(a) — Explicit consent (health data)
Producing anonymised impact reports for clients	Anonymised, aggregated survey data	Art. 6(1)(f) — Legitimate interests	N/A (data is anonymised)
Recording workshop attendance	Name, date, session attended	Art. 6(1)(b) — Contract performance	N/A
Sending marketing emails about our services	Name, email	Art. 6(1)(a) — Consent	N/A

Website analytics and improvement	Technical data, usage data, cookies	Art. 6(1)(f) — Legitimate interests	N/A
Invoicing and financial record-keeping	Name, organisation, invoice details, correspondence	Art. 6(1)(c) — Legal obligation (tax/accounting)	N/A
Defending or pursuing legal claims	All relevant engagement data	Art. 6(1)(f) — Legitimate interests	N/A
Publishing testimonials and case studies	Name, job title, testimonial content, photographs	Art. 6(1)(a) — Consent	N/A

**Legitimate interests:** Where we rely on legitimate interests, we have conducted a balancing test to ensure our interests do not override your rights and freedoms. You have the right to object to processing based on legitimate interests at any time (see Section 8).

## 4. Special Category Data — Wellbeing Surveys

Wellbeing survey responses may include information about your mental health, stress levels, sleep patterns, and coping behaviours. This constitutes special category data (data concerning health) under Article 9 UK GDPR and receives enhanced protection.

### 4.1 How we collect this data

We collect wellbeing survey data only with your explicit, informed consent, obtained through a Participant Consent Form completed before you take the survey. Participation is always voluntary. You may skip any question you do not wish to answer.

### 4.2 How we use this data

- To produce anonymised, aggregated wellbeing reports for your employer showing team-level trends — never individual, identifiable results
- To track changes in team wellbeing over the course of a programme
- To tailor programme content to the needs identified in survey responses

### 4.3 Anonymisation safeguards

- Individual responses are never shared with your employer, your manager, or any other person in your organisation in identifiable form
- All data included in client reports is anonymised and aggregated
- Where a survey group contains fewer than 5 respondents, results are merged with a larger group to prevent indirect identification
- Anonymised data is not considered personal data under UK GDPR and may be retained indefinitely for benchmarking

### 4.4 Withdrawal of consent

You can withdraw your consent to the processing of your survey data at any time by contacting us at [peace@natuarasanctuary.com](mailto:peace@natuarasanctuary.com). Upon withdrawal, your identifiable data will be securely deleted within 30 days. Data already anonymised and included in aggregate reports cannot be extracted, as it is no longer linked to you.

## 5. Who We Share Your Data With

We do not sell, rent, or trade your personal data. We share data only in the following limited circumstances:

### 5.1 Client organisations

Anonymised, aggregated wellbeing survey results and impact report data only. We never share individual, identifiable responses.

### 5.2 Service providers (data processors)

We use a limited number of third-party service providers to operate our business. Each processes data on our behalf under a data processing agreement and is required to implement appropriate security measures.

Provider	Purpose	Data Processed	Server Location
Website host: ionos.co.uk	Website hosting	Technical/usage data	[UK/EU/US]
Email: ionos.co.uk	Email, file storage	Correspondence, documents	[UK/EU/US]
Booking tool ionos.co.uk	Discovery call scheduling	Name, email	[UK/EU/US]
Survey tool: SmartSurvey	Wellbeing survey hosting	Survey responses	[UK/EU/US]
Analytics: ionos.co.uk	Website analytics	Anonymised usage data	[UK/EU/US]
Marketing: Not used at present date	Newsletter distribution	Name, email	[UK/EU/US]
Payment: Bank Transfer, Stripe, PayPal	Invoice payment processing	Payment data (we do not see card details)	[UK/EU/US]
Accounting: Not used at present date	Financial record-keeping	Invoice data, client details	[UK/EU/US]

### 5.3 Professional advisors

Our accountant, solicitor, or insurer where necessary for the operation and protection of our business, subject to professional confidentiality obligations.

### 5.4 Legal or regulatory authorities

Where we are required to disclose data by law, regulation, court order, or binding request from a regulatory body (including HMRC and the ICO).

## 5.5 Business transfers

If our business is sold, merged, or restructured, personal data may be transferred to the successor organisation. We will notify affected individuals before any such transfer and ensure equivalent data protection obligations apply.

## 6. International Data Transfers

Some of the service providers listed in Section 5.2 may process data outside the United Kingdom. Where personal data is transferred to a country not covered by a UK adequacy decision, we ensure appropriate safeguards are in place:

- UK International Data Transfer Agreement (IDTA)
- UK Addendum to the EU Standard Contractual Clauses
- The provider's binding corporate rules or approved certification scheme

You may request a copy of the relevant safeguards by contacting us at [peace@naturasanctuary.com](mailto:peace@naturasanctuary.com)

## 7. Data Retention

We retain personal data only for as long as necessary for the purpose it was collected. Our retention periods are:

Data Category	Retention Period	Reason
Website enquiries (contact form/email)	24 months from last contact	To follow up on potential engagements
Client engagement records	6 years from end of engagement	Tax, legal, and contractual obligations
Wellbeing survey data (identifiable)	12 months from programme end	Analysis and reporting
Wellbeing survey data (anonymised)	Indefinitely	Benchmarking (no longer personal data)
Workshop attendance records	24 months from session date	Programme tracking
Marketing consent records	Duration of subscription + 12 months	Proof of consent
Financial records (invoices, receipts)	6 years from financial year end	HMRC requirements
Website analytics	Per analytics provider settings (typically 14–26 months)	Website improvement
Testimonials and case studies	Until consent is withdrawn	Marketing (with ongoing consent)

When the retention period expires, personal data is securely deleted using overwrite or cryptographic erasure methods. Paper records are shredded.

## 8. Your Rights

Under UK GDPR, you have the following rights. We will respond to any valid request within one calendar month (extendable by two months for complex requests, with notification).

- **Right of access (Article 15):** You can request a copy of the personal data we hold about you, together with information about how it is processed. We will provide this free of charge in a commonly used electronic format.
- **Right to rectification (Article 16):** You can ask us to correct inaccurate data or complete incomplete data without undue delay.
- **Right to erasure (Article 17):** You can ask us to delete your data where there is no compelling reason for continued processing. This right does not apply where we are required to retain data for legal or contractual obligations.
- **Right to restrict processing (Article 18):** You can ask us to suspend processing of your data in certain circumstances, for example while we verify the accuracy of contested data.
- **Right to data portability (Article 20):** Where processing is based on consent or contract and carried out by automated means, you can request your data in a structured, commonly used, machine-readable format, or ask us to transmit it to another controller.
- **Right to object (Article 21):** You can object to processing based on legitimate interests. We will stop processing unless we can demonstrate compelling legitimate grounds that override your interests, rights, and freedoms.
- **Right to withdraw consent:** Where processing is based on consent (e.g. marketing emails, wellbeing surveys), you can withdraw consent at any time. This does not affect the lawfulness of processing carried out before withdrawal.
- **Rights related to automated decision-making (Article 22):** We do not make any decisions based solely on automated processing that produce legal or similarly significant effects on you.

**How to exercise your rights:** Contact us at [peace@naturasanctuary.com](mailto:peace@naturasanctuary.com) with your request. We may ask for proof of identity before processing your request. If your request is manifestly unfounded or excessive, we may charge a reasonable fee or refuse the request, providing our reasons.

## 9. Automated Decision-Making and Profiling

We do not use automated decision-making or profiling that produces legal or similarly significant effects. Wellbeing survey data is analysed manually by our team to produce aggregate insights. No individual decisions, assessments, or scores are generated about survey participants.

## 10. Data Security

We implement appropriate technical and organisational measures to protect personal data, including:

- Encryption of data in transit (TLS/SSL) and at rest where supported by our service providers
- Strong, unique passwords and two-factor authentication on all business accounts

- Access controls: personal data is accessible only to authorised personnel on a need-to-know basis
- Secure deletion protocols for data past its retention period
- Regular review of security measures and service provider practices
- Staff training on data protection obligations and incident response
- Physical security: paper records (if any) are stored in locked cabinets and shredded when no longer needed

No system is completely secure. While we take all reasonable steps, we cannot guarantee absolute security of data transmitted over the internet.

## **11. Children’s Data**

Our website and services are directed at organisations and their adult employees. We do not knowingly collect personal data from anyone under the age of 18. If we discover that we have collected data from a child, we will delete it promptly and notify the relevant parent or guardian where appropriate.

## **12. Links to Other Websites**

Our website may contain links to third-party websites (including booking tools, social media platforms, and resource pages). These websites operate independently with their own privacy policies. We are not responsible for the privacy practices or content of third-party sites. We encourage you to read their privacy policies before providing any personal data.

## **13. Changes to This Privacy Policy**

We may update this Privacy Policy from time to time to reflect changes in our practices, services, or legal requirements. Any material changes will be communicated by a prominent notice on our website and, where we hold your email address, by direct notification. The “Last updated” date at the top of this page will always reflect the most recent revision.

We recommend reviewing this page periodically to stay informed about how we protect your data.

## **14. How to Complain**

If you are dissatisfied with how we handle your personal data, please contact us first at [peace@naturasanctuary.com](mailto:peace@naturasanctuary.com) so we can try to resolve the issue.

If you remain unsatisfied, you have the right to lodge a complaint with the Information Commissioner’s Office (ICO):

- Website: [ico.org.uk](http://ico.org.uk)
- Helpline: 0303 123 1113
- Post: Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

## 15. Contact Us

Natura Sanctuary

[peace@naturasanctuary.com](mailto:peace@naturasanctuary.com)