

MUSCULUS SPORTS MASSAGE

CLIENT PRIVACY NOTICE

AND MORGAN BUILD / IMPLEMENTATION INSTRUCTIONS

Working specification for the Musculus Clinic Manager and website

WHAT THIS DOCUMENT IS FOR

The Privacy Notice is information for clients. It explains what personal and health information Musculus Sports Massage collects, why it is used, how it is protected, who it may be shared with, how long it is kept, and the client's data-protection rights.

It is **not** another treatment-consent form and clients do not need to sign it simply to acknowledge UK GDPR.

The Hub is private, but it stores client personal and health information. The client therefore needs access to the Privacy Notice when that information is collected.

Where it should appear

Website	Create a permanent page titled Privacy Notice . Add a link in the website footer and make it accessible from the booking / client-information journey.
Form 27	Add a short privacy statement and a Read Privacy Notice link. Do not paste the full notice into Form 27.
Clinic Manager Hub	Store the current Privacy Notice version in the admin/settings area. The full notice does not need to clutter the client's front page.
Client record	Record which Privacy Notice version was presented when Form 27 was submitted. This is an audit record, not a consent signature.

MORGAN - IMPORTANT BUILD RULE

Do not add an 'I consent to GDPR' checkbox.

The privacy notice is a transparency notice. Where consent is genuinely required - for example optional promotional Photo & Video use - that consent is collected separately.

The client should be able to open/read the Privacy Notice before or while completing Form 27.

Morgan Implementation Instructions

1. Website

- Create a page titled **Privacy Notice** containing the client-facing notice in this document.
- Add **Privacy Notice** to the website footer.
- Make the Privacy Notice reachable from the booking / onboarding journey before the client submits personal or health information.

2. Form 27

Add the following short block near the client declaration / before the final signature:

FORM 27 - SHORT PRIVACY STATEMENT

Musculus Sports Massage collects and uses personal and health information to manage your client record, assess the suitability and safety of treatment, provide and document treatment, and meet appropriate business, insurance and legal requirements.

Please read the **Musculus Sports Massage Client Privacy Notice**, which explains how your information is used, stored, protected and shared, how long it is retained, and your data-protection rights.

[READ PRIVACY NOTICE]

No separate signature is required for this privacy statement.

3. What happens when the client taps Read Privacy Notice

- Open the current Privacy Notice in a modal, side panel, new screen or web page without losing the client's Form 27 progress.
- Include a clear **Close / Back to Form** control.
- When closed, return the client to the exact same point in Form 27.
- The client must still be able to submit Form 27 even though no separate 'privacy consent' checkbox is used.

4. What must be recorded in the database

Notice Version	Store a version identifier, for example Privacy Notice v1.0 .
Effective Date	Store the effective date of that version.
Form 27 Submission	Record the Privacy Notice version that was current when the Form 27 submission was saved.
Historical Versions	Do not overwrite or delete the wording of older versions that were previously presented to clients.
Current Version	Admin/settings should identify which Privacy Notice is currently live.

5. If the Privacy Notice changes later

- Create a new version rather than editing the historical version in place.
- Update the website and Form 27 link to the new current version.
- Keep prior versions available internally for audit purposes.
- If a change materially affects how existing client information is used, Musculus should assess whether clients need to be proactively informed.

Musculus Sports Massage - Client Privacy Notice

Data Controller: Mark Powell trading as Musculus Sports Massage

Business address: Business Centre, 21-22 Burns Street, Ilkeston, DE7 8AA

Telephone: 07885 675005

Website: www.mpmusculus.com

What information we collect

- Name, address, date of birth and contact details.
- Emergency-contact information.
- Parent / person-with-parental-responsibility information where relevant.
- Occupation, lifestyle, sport and activity information where relevant to treatment.
- GP or other healthcare-practitioner information where relevant.
- Medical history, injuries, health conditions, symptoms, medication, allergies and sensitivities.
- Contraindication and health-screening information.
- Consultation, assessment, SOAP notes, treatment and progress records.
- Consent records, signatures and appointment information.
- Payment / transaction information and relevant correspondence.
- Photographs or video only where collected for an agreed purpose.

Health and treatment information is special-category personal data and requires additional protection under UK data-protection law.

Why we use your information

- To register and identify you as a client.
- To arrange and manage appointments.
- To assess whether treatment is safe and appropriate.
- To plan, provide and document treatment.
- To maintain an accurate clinical and treatment history.
- To identify contraindications, precautions and treatment modifications.
- To record informed consent and manage treatment-specific consent.
- To communicate with you about appointments or treatment.
- To manage payments, administration, insurance, complaints and legal claims where applicable.
- To protect the safety and security of clients, records and the business.

Lawful basis

Musculus Sports Massage must identify and document an appropriate UK GDPR lawful basis for each use of personal information. Health information also requires an appropriate special-category condition. Optional promotional Photo & Video use is handled separately and, where consent is relied upon, the client can withdraw that consent.

BEFORE GO-LIVE - MARK / MORGAN TO CONFIRM

The final published notice must state the actual lawful basis / bases and the applicable special-category condition used by Musculus.

Do not publish a guessed legal basis. Confirm this against Musculus's actual processing activities and, where necessary, professional/legal advice.

Who information may be shared with

Musculus Sports Massage does not sell client information.

Where necessary, limited information may be shared with organisations that support the operation of the business, such as clinic-management / IT / cloud providers, booking providers, payment processors, accountants or professional advisers, insurers, healthcare professionals where appropriate and lawful, and legal or regulatory bodies where required.

BEFORE GO-LIVE - ACTUAL PROCESSORS MUST BE CHECKED

Morgan should provide Mark with a list of every third-party service that stores, processes, backs up, transmits or can access client data through the Hub.

The website / booking / payment providers actually used by Musculus should also be identified.

The final notice must accurately reflect the real systems in use, including any relevant international transfers.

How long information is kept

Musculus Sports Massage will keep identifiable personal information only for as long as there is a justified business, clinical, insurance or legal need and will securely delete, destroy or anonymise information when it is no longer required.

RETENTION PERIOD - DO NOT HARD-CODE YET

UK data-protection law does not prescribe one universal retention period for all client records.

Before the Hub goes live, Mark should confirm the required record-retention period with his professional indemnity insurer / professional requirements.

Once confirmed, Morgan should set the retention rule in the system and the exact period should be added to the published Privacy Notice.

Security

- Access to client information should be limited to authorised users.
- The Hub should use appropriate account security, access controls, backups and technical safeguards.
- Historical clinical and consent records should be preserved and not silently overwritten.
- Sensitive information should not be exposed on public-facing screens or links.

Children and young people

Date of birth is used to apply the correct consent and safeguarding process. Where a client is under 16, information about a person with parental responsibility and the relevant consent record may be collected and stored. Under Musculus policy, promotional Photo & Video consent is disabled for clients under 18.

Your data-protection rights

Depending on the circumstances and legal basis, clients may have rights including:

- Access to a copy of their personal information.
- Correction of inaccurate or incomplete information.
- Erasure in circumstances where the law allows it.
- Restriction of processing in certain circumstances.
- Objection to certain processing, including direct marketing.
- Data portability for certain information.
- Withdrawal of consent where processing is based on consent.

Withdrawal of consent does not automatically require deletion of clinical records that Musculus is otherwise entitled or required to retain.

Photo & Video

Photo & Video permissions are separate from treatment consent. Clients may choose which uses they agree to and may change or withdraw those permissions. Refusing optional Photo & Video consent will not affect treatment.

Data-protection complaints

Clients must have a clear way to raise a data-protection complaint with Musculus Sports Massage. Musculus must acknowledge receipt of a data-protection complaint within 30 days and then investigate, keep the complainant informed as appropriate, and communicate the outcome without undue delay.

Clients may also complain to the Information Commissioner's Office (ICO) if they are unhappy with how their personal information has been handled.

Changes to the Privacy Notice

The notice should be reviewed when the Hub, website, booking system, payment system, service providers, retention rules or purposes for using client data materially change. Each published version should have a version number and effective date.

Morgan Go-Live Checklist

- ☐ Privacy Notice page created on website.
- ☐ Privacy Notice linked in website footer.
- ☐ Short Privacy Notice statement added to Form 27.
- ☐ Read Privacy Notice opens without losing Form 27 progress.
- ☐ Current Privacy Notice version and effective date stored in Hub admin/settings.
- ☐ Form 27 submission records the Privacy Notice version presented.
- ☐ Historical Privacy Notice versions are retained and not overwritten.
- ☐ Actual Hub / hosting / database / backup providers identified.
- ☐ Actual booking and payment providers identified.
- ☐ Any international data transfers identified and appropriate safeguards confirmed.
- ☐ Actual UK GDPR lawful basis / bases documented.
- ☐ Actual Article 9 special-category condition for health information documented.
- ☐ Retention period confirmed against Musculus insurer / professional requirements and then configured.
- ☐ Role-based access / user permissions configured.
- ☐ Secure login controls and backup process configured.
- ☐ Data-protection complaint contact route configured.
- ☐ Complaint process includes acknowledgement within 30 days.
- ☐ Client rights / access request process documented.
- ☐ Photo & Video consent remains separate from treatment and privacy notice.

STATUS OF THIS DOCUMENT

This PDF is a **working implementation specification** for Morgan and a draft client-facing Privacy Notice.

Morgan can build the Privacy Notice page, Form 27 link, versioning and audit trail from this document now.

Before public go-live, Mark should confirm the highlighted items: actual third-party processors, lawful basis / Article 9 condition, and record-retention period.

Source checks used for this build

This working specification was checked against current Information Commissioner's Office (ICO) guidance on the right to be informed, privacy information requirements, special-category health data, lawful basis, storage limitation, international transfers and data-protection complaints. Current 2026 ICO guidance requires organisations to provide a clear route for data-protection complaints and acknowledge them within 30 days.