

Privacy Policy

Seven Rivers Wellness. Prepared for web implementation. Draft for solicitor review. August 2026.

1. Who we are

Seven Rivers Wellness is the trading name of **Matt Dunham and Sandra Dunham**. We are based in the Republic of Ireland.

We are the data controller in respect of the personal data described in this policy. That means we decide what data is collected and what happens to it.

- **Registered address: Kylebrack, Loughrea, Galway, republic of Ireland.**
- Email: info@sevenrivers-wellness.com
- Website: sevenrivers-wellness.com

This policy explains what personal data we collect, why we collect it, what we do with it, how long we keep it, and what rights you have. It is written in accordance with the General Data Protection Regulation and the Data Protection Acts 1988 to 2018.

We are not required to appoint a Data Protection Officer. Any question about your data should be sent to the email address above.

2. What personal data we collect

We collect only what we need to deliver our services.

Identity and contact information

Your name, email address, and telephone number. Collected when you download a free resource, book a discovery call, enquire about our services, or enrol on a programme.

Enquiry and booking information

When you book a discovery call you answer a small number of questions about your current situation and what prompted you to get in touch. This is free text and you decide what to put in it.

Health information

If you enrol on our 1 to 1 Coaching programme, we collect health information about you. This is treated separately and more carefully than everything else in this policy, and section 3 explains it in full.

Payment information

Payments are processed by Stripe. We can see that a payment was made, for what, and when. We never see or store your card details.

Communications

Emails and messages between us, including WhatsApp messages where you choose to use that channel, and our notes of what was discussed.

Website usage data

Information about how visitors use the site, collected through cookies and analytics tools. Section 13 sets out what is used and how you control it.

3. Health information

Health data is treated as a special category of personal data under Article 9 of the GDPR. It carries stronger protection than ordinary personal data, and we hold it on a narrower basis.

What we collect

- Health and intake screening completed before your first call. This covers pregnancy, cardiovascular and respiratory conditions, mental health conditions, medication that affects breathing, heart rate or blood pressure, injuries, chronic pain, and anything else you tell us is relevant.
- Weekly check-in responses. Your own ratings of sleep, calmness, physical relaxation, energy, mood stability, and how consistently you have practised, together with your breath hold measurement and any notes you add.
- Notes made by your practitioner recording what was discussed and what was agreed, so that your work carries forward properly from one week to the next.

Why we collect it

For two reasons only. To deliver your programme safely, because some breathing techniques are not suitable in certain circumstances and we cannot know that unless you tell us. And to keep a proper record of the work, which is a requirement of responsible practice and of our professional insurance.

Our lawful basis

We rely on your explicit consent under Article 9(2)(a). You give that consent separately, by a specific tick on the health and intake screening form, and it is not bundled into your acceptance of our Terms and Conditions.

You may withdraw that consent at any time by emailing info@sevenrivers-wellness.com. Withdrawal does not affect anything lawfully done beforehand. We should be straightforward with you about the consequence: without health screening information we cannot deliver the breathwork element of the programme safely, and we would need to discuss with you whether the programme can continue.

Who sees it

Your practitioner, and where both practitioners are involved in your work, both of them. Nobody else. It is not used for marketing, it is not used for research, and it is never shared with an employer, an insurer, or any other third party without your express and separate consent.

If you are with us through a corporate programme paid for by your employer, your employer is told only that sessions took place. Nothing you say and nothing you record is passed to them.

One exception, and we would rather you knew about it now than at the moment it applied.

If you tell us something that gives us reasonable grounds for concern that you or another person is at immediate risk of serious harm, or that a child or an adult who cannot protect themselves is at risk, we may have to pass that on. We would tell you we were doing so wherever it is safe and possible to do that. This is the only circumstance in which we would share what you have told us without your agreement.

4. Our lawful basis for processing

We process personal data only where the law permits it. The table sets out which basis applies to what.

Purpose	Data used	Lawful basis
Delivering a programme or service you have purchased	Name, contact details, communications, session records	Performance of a contract
Delivering the breathwork element safely and keeping proper practice records	Health screening, weekly check-in responses, practitioner notes	Explicit consent, Article 9(2)(a)
Responding to an enquiry or a discovery call booking	Name, contact details, your answers to the booking questions	Legitimate interests, in responding to a request you made of us
Sending educational and marketing emails	Name, email address	Consent
Understanding how the website is used	Analytics data, cookie identifiers	Consent
Keeping financial and tax records	Transaction records	Legal obligation
Establishing, exercising or defending a legal claim	Whatever is relevant to the claim	Legal obligation, and Article 9(2)(f) where health data is involved

5. Email and marketing

If you download a free resource, you are asked whether you would like to receive our emails. If you say yes, you receive the resource and then a short educational sequence, followed by occasional updates.

If you purchase from us, you will receive the emails needed to deliver what you bought. Those are not marketing and you cannot unsubscribe from them while your programme is running.

Buying something is not by itself agreement to be marketed to. You are given a clear opportunity to opt out of marketing emails at the point of purchase, and you can unsubscribe from any marketing email at any time using the link at the bottom of it. Unsubscribing never affects the delivery of a programme you have paid for.

Our email platform is Flodesk. Your name and email address are stored on their systems.

6. Who we share your data with

We do not sell, rent, or trade your personal data, and we never will.

We use the following providers to run the practice. Each processes data on our instructions under a data processing agreement.

Provider	What they process	Location
Stripe	Payment processing and subscription management.	EU and United States
Jotform	Hosts our health and intake screening form and our weekly check-in form, and stores the responses. Encryption is enabled on these forms.	EU/ US data residency
Cal.com	Discovery call bookings, including your name, email, telephone number and your answers to the booking questions.	EU
Flodesk	Email marketing.	United States
WhatsApp	Client communication where you choose to use it, and delivery of weekly forms. Message content is encrypted in transit. You may ask us to use email instead at any time.	EU and United States
Website hosting	Toolkit Websites, UK	UK
Analytics and advertising	Google Analytics, Google Ads and Meta advertising tags are in use.	EU and United States

We may also disclose data where we are legally required to, or in the limited safety circumstance described at the end of section 3.

7. Transfers outside the European Economic Area

Some of our providers are based outside the European Economic Area, principally in the United States. Where data is transferred there, we rely on the Standard Contractual Clauses approved by the European Commission, or on the provider being certified under the EU to US Data Privacy Framework.

Health information is held on systems with encryption enabled. If you would prefer that your weekly check-in is completed by another means, ask us and we will arrange it.

8. How long we keep your data

What	How long	Why
Health screening, weekly check-in responses, and practitioner notes	Seven years from the end of your programme	Responsible practice record keeping and the requirements of our professional insurance. If you are under 18 at any point during your programme, records are kept for seven years from your eighteenth birthday.
Client contact details and programme records	Seven years from the end of your programme	Held with the above as a single client record.
Financial and transaction records	Seven years	Irish tax legislation requires at least six years. We hold them for seven so that they sit alongside the rest of the client record.
Discovery call bookings that did not lead to enrolment	Twelve months	So that we can pick up a conversation if you come back to us. Deleted after that.
Email marketing list	For as long as you are subscribed	Removed on unsubscribe. Full deletion on request at any time.
General enquiries and support emails	Twelve months after the matter is closed	No reason to keep them longer.
Website analytics	CONFIRM: the retention period configured in the analytics tool	Anonymised or pseudonymised usage data.

At the end of a retention period, data is deleted or securely destroyed. Where a platform we use cannot automatically delete on the schedule above, we manage that deletion manually.

9. How your data is kept secure

- Devices holding client records are password protected and encrypted.
- Encryption is enabled on our forms platform for both the intake screening form and the weekly check-in form.
- Access is limited to Matt Dunham and Sandra Dunham. No third party has access to client records.
- Card details are never held by us at any point.

10. Your rights

Under the GDPR you have the right to:

- Ask for a copy of the personal data we hold about you.
- Have inaccurate or incomplete data corrected.
- Ask us to delete your data, subject to any legal obligation we have to retain it. Practice records held for the reasons in section 8 are the usual exception.
- Ask us to restrict how we use your data.
- Receive your data in a structured, commonly used, machine readable format, or have it sent to someone else.
- Object to processing that we carry out on the basis of legitimate interests.

- Withdraw consent at any time, where consent is the basis we rely on. This includes the explicit consent covering your health information.

Email info@sevenrivers-wellness.com to exercise any of these. We will respond within one month. There is no charge.

11. Cookies and tracking

A cookie is a small text file placed on your device by a website.

Type	Purpose	Consent
Essential	Needed for the site to work, for example remembering your cookie choices and enabling secure checkout.	Not required
Analytics	Tells us how visitors find and move through the site so we can improve it.	Required
Advertising	CONFIRM: whether advertising tags are in use. If they are, they are named and described here.	Required

A consent notice appears when you first visit the site. You may accept or decline non essential cookies, and you can change your choice at any time through the link in the site footer. Declining is as easy as accepting.

Analytics and advertising tools may assign a persistent identifier to your device. That identifier is personal data even though it does not carry your name, which is why your consent is required before those tools are loaded.

12. Links to other websites

Our site may link to other websites. This policy applies only to our own site and services. We are not responsible for how other sites handle your data.

13. Children

Our services are for adults. We do not knowingly collect data from anyone under 18 without the involvement and consent of a parent or guardian. If you believe we hold data about a child, contact us and we will look into it and delete it where appropriate.

14. Making a complaint

If you are unhappy with how we have handled your data, please tell us first at info@sevenrivers-wellness.com. We would rather put something right than have you go elsewhere with it.

You also have the right to complain to the Data Protection Commission at any time.

- Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28, Republic of Ireland
- dataprotection.ie

15. Changes to this policy

We may update this policy. Any material change is posted on this page with a revised date, and where the change affects how we use data you have already given us, we will tell you by email.

16. Contact

Seven Rivers Wellness

Republic of Ireland

info@sevenrivers-wellness.com

sevenrivers-wellness.com

Last updated: August 2026