

## Privacy Policy

Simply Good Nutrition holds some information about you. This document outlines how that information is used, who we may share that information with and how we keep it secure. This notice does not provide exhaustive detail. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to [simplygoodnutritionuk@gmail.com](mailto:simplygoodnutritionuk@gmail.com). We keep this Privacy Notice under regular review. This Privacy Notice was last reviewed in January 2021.

### 1. How We Obtain Your Personal Data

#### Information provided by you

You provide us with personal data in the following ways:

- Booking a 20-minute free discovery call
- By signing a terms of engagement form
- By completing nutritional therapy questionnaires, eg pre-consultation questionnaire
- During a nutritional therapy consultation
- Through email, over the telephone or by post
- By taking credit card and online payment

This may include the following information:

- basic details such as name, address, contact details and next of kin
- details of contact we have had with you such as referrals and appointment requests
- health information including your previous medical history, dietary, lifestyle, supplement and medicine details, biochemical test results, clinic notes and health improvement plans
- GP contact information
- Bank details

#### Information we get from other sources

- We may obtain sensitive medical information in the form of test results from biochemical testing companies.
- We may obtain sensitive information from other healthcare providers. The provision of this information is subject to you giving us your express consent. If we do not receive this consent from you, we will not be able to coordinate your healthcare with that provided by other providers which means the healthcare provided by us may be less effective.

We use this information in order to provide you with direct healthcare. This means that the legal basis of our holding your personal data is for legitimate interest.

### 2. How long do you hold confidential information for?

Following completion of your healthcare we retain your personal data for the period defined by our professional association BANT and registrant body, CNHC. This enables us to process any complaint you may make. In this case the legal basis of our holding your personal data is for contract administration.

On this basis all records held by Simply Good Nutrition for **adults** are kept for exactly 8 years from the date of the last consultation and then destroyed. If a client is a child, records will be kept until their 25<sup>th</sup> birthday or 26<sup>th</sup> birthday if the child was 17 at the conclusion of the nutritional therapy services.

### 3. How we use your personal data

We act as a data controller for use of your personal data to provide direct healthcare. This includes processing of your data from third parties such as testing companies, other healthcare providers, credit card and online payments.

We undertake at all times to protect your personal data, including any health and contact details, in accordance with requirements of the General Data Protection Regulation (GDPR) concerning data protection. We will also take reasonable security measures to protect your personal data storage.

We may use your data for marketing purposes such as newsletters but this would be subject to you giving us your express consent.

### 4. Do you share my information with other organisations?

I will keep information about you confidential. We will only disclose your information with other third parties with your express consent with the exception of the following categories of third parties:

- Our registrant body, CNHC and our professional association, BANT, for the processing of a complaint made by you
- Any legal or crime prevention agencies (eg formal court order) and/or to satisfy any regulatory request (eg, CNHC) if we have a duty or if the law allows us to do so

We may share your information with supplement companies and biochemical testing companies as part of providing you with direct healthcare. We will not include any sensitive information

We will seek your express consent before sharing your information with your GP or other healthcare providers. However, if we believe that your life is in danger then we may pass your information onto an appropriate authority (such as the police, social services in the case of a child or vulnerable adult, or GP in case of self-harm) using the legal basis of vital interests.

We may share your case history in an anonymised form with our peers for the purpose of professional development. This may be at clinical supervision meetings, conferences, online forums, and through publishing in medical journals, trade magazines or online professional sites. We will seek your explicit consent before processing your data in this way.

### 5. What are your rights?

Every individual has the right to see, amend, delete or have a copy, of data held that can identify you, with some exceptions (listed on the [ICO website](#)) . You do not need to give a reason to see your data.

If you want to access your data you must make a subject access request in writing to [simplygoodnutritionuk@gmail.com](mailto:simplygoodnutritionuk@gmail.com). Under special circumstances, some information may be withheld (listed on the [ICO website](#)). We shall respond within 20 working days from the point of receiving the request and all necessary information from you. Our response will include the details of the personal data we hold on you including:

- Sources from which we acquired the information
- The purposes of processing the information
- Persons or entities with whom we are sharing the information

You have the right, subject to exemptions (listed on the [ICO website](#)), to ask to:

- Have your information deleted
- Have your information corrected or updated where it is no longer accurate
- Ask us to stop processing information about you where we are not required to do so by law or in accordance with the BANT and CNHC guidelines.
- Receive a copy of your personal data, which you have provided to us, in a structured, commonly used readable format and have the right to transmit that data to another controller, without hindrance from us.
- Object at any time to the processing of personal data concerning you

We do not carry out any automated processing, which may lead to automated decision based on your personal data.

If you would like to invoke any of the above rights then please write to Simply Good Nutrition, by email [simplygoodnutritionuk@gmail.com](mailto:simplygoodnutritionuk@gmail.com).

## **6. What safeguards are in place to ensure data that identifies me is secure?**

We only use information that may identify you in accordance with GDPR. This requires us to process personal data only if there is a legitimate basis for doing so and that any processing must be fair and lawful.

Within the health sector, we also have to follow the common law duty of confidence, which means that where identifiable information about you has been given in confidence, it should be treated as confidential and only shared for the purpose of providing direct healthcare. We will protect your information, inform you of how your information will be used, and allow you to decide if and how your information can be shared.

We also ensure the information we hold is kept in secure locations, restrict access to information to authorised personnel only, protect personal and confidential information held on equipment such as laptops with encryption (which masks data so that unauthorised users cannot see or make sense of it). We ensure external data processors that support us, are legally and contractually bound to operate and prove security arrangements are in place where data that could or does identify a person are processed.

Simply Good Nutrition is registered with the Information Commissioner's Office (ICO) as a data controller and collects data for a variety of purposes. A copy of the registration is available through the ICO website (search by business name).

## 7. Website on-line technical details

- a. Forms these are used on our website making use of an available 'forms module' which has a number of built-in features to help ensure privacy. The website is secured through a security certificate which encrypts all data processed through it.
- b. We do not make use of cookies to collect any private or personally identifiable information. The technical platform of this website uses cookies solely to aid the proper technical functioning of the website – which in no way collects or discloses any personal information about you as a visitor.
- c. On-line consultations are via zoom, a platform with end-to-end encryption. Each consultation has a unique ID which is only shared between Simply Good Nutrition and the client. Zoom consultations are not recorded.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org)

To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>

## 8. Analytics

Like most websites, we make use of analytics software in order to help us understand the trends in popularity of our website and of different sections. We make no use of personally identifiable information in any of the statistical reports we use from this package.

## 9. Complaints

If you have a complaint regarding the use of your personal data then please contact us by writing to Simply Good Nutrition by email [simplygoodnutritionuk@gmail.com](mailto:simplygoodnutritionuk@gmail.com) and we will do our best to help you.

If your complaint is not resolved to your satisfaction and you wish to make a formal complaint to the Information Commissioner's Office (ICO), you can contact them on 01625 545745 or 0303 1231113.