



PRIVACY & COOKIE POLICY

I, Sally Duffin, trading as Nutrition in York, hold personal information about you. This document outlines how that information is used, who I may share that information with and how I keep it secure. I am happy to provide any additional information or explanation needed; please email me at sallyduffin@nutritioninyork.co.uk with your questions.

This Privacy Notice was last reviewed in January 2019.

1. What I Do

I provide nutritional therapy services to clients to improve their health through diet and lifestyle interventions. I focus on preventative healthcare, the optimisation of physical and mental health and chronic health conditions. Through nutritional therapy consultations, dietary and lifestyle analysis and biochemical testing, I aim to understand the underlying causes of your health issues which I seek to address through personalised dietary therapy, nutraceutical prescription (supplements) and lifestyle advice.

I also run workshops, teach Higher Education nutrition, and work as a freelance writer.

2. How I Obtain Your Personal Data

- By completing a nutritional therapy questionnaire
- By signing a terms of engagement form
- During a nutritional therapy consultation
- Through email, over the telephone or by post

This may include the following information:

- name, address, contact details, GP name and address
- 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
- Bank details

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

Following completion of your healthcare I retain your personal data for the period defined by our professional association BANT (British Association for Nutrition and Lifestyle Medicine) and the CNHC (Complementary and Natural Healthcare Council). This enables me to process any complaint you may make. In this case the legal basis of my holding your personal data is for contract administration.

Information we get from other sources

I may obtain sensitive medical information in the form of test results from biochemical testing companies. I use this information to provide you with direct healthcare. This means that the legal basis of my holding your personal data is for legitimate interest.

I may obtain sensitive information from other healthcare providers. The provision of this information is subject to you giving me your express consent. If I do not receive this consent from you, I will not be able to coordinate your healthcare with that provided by other providers.

3. How I use your personal data

I am the data controller for use of your personal data to provide direct healthcare. I also act as a controller and processor in the processing of your data from third parties such as testing companies and other healthcare providers. I act as a data controller and processor to the processing of some credit card and online payments.

I strive to protect your personal data, including any health and contact details, in a manner which is consistent with my duty of professional confidence and the requirements of the General Data Protection Regulation (GDPR) concerning data protection. I take reasonable security measures to protect your personal data storage.

I may use your personal data where there is an overriding public interest in using the information e.g. in order to safeguard an individual, or to prevent a serious crime. Also, where there is a legal requirement such as a formal court order. I may use your data for marketing purposes: this is subject to you giving me your express consent.

4. Do you share my information with other organisations?

I keep information about you confidential. I will only disclose your information with other third parties with your express consent except for 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 contractors and advisors that provide a service to us or act as our agents on the understanding that they keep the information confidential
- Anyone to whom we may transfer our rights and duties under any agreement we have with you
- Any legal or crime prevention agencies and/or to satisfy any regulatory request (eg, CNHC) if we have a duty to do so or if the law allows us to do so

I may share information about you with supplement and biochemical testing companies as part of providing you with direct healthcare.

If I believe your life is in danger, I 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.

I 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. I will seek your express 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. 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 sallyduffin@nutritioninyork.co.uk Under special circumstances, some information may be withheld. I shall respond within 20 working days from the point of receiving the request and all necessary information from you. My response will include the details of the personal data I hold on you including:

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

You have the right, subject to exemptions, to ask to:

- Have your information deleted
- Have your information corrected or updated where it is no longer accurate
- Ask me 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 and machine-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

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

6. How do you keep my data secure?

I only use information that may identify you in accordance with GDPR. This requires me 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, I must 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.

I also ensure the information I hold is kept in secure locations (locked filing cabinet in a locked office - unless it is transit between locations e.g. from office to home office), restrict access to information

to authorised personnel only, protect personal and confidential information held on laptops with password encryption (which masks data so that unauthorised users cannot see or make sense of it). I ensure external data processors that support my business 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.

If information is emailed between myself and you as a client, it is done so in the knowledge that email as a form of communication is inherently insecure even when accounts are password protected.

I, Sally Duffin, trading as Nutrition in York am registered with the Information Commissioner's Office (ICO) as a data controller and collect data for a variety of purposes. A copy of the registration is available through the ICO website (search by business name).

7. How long do you hold confidential information for?

All written records held by me will be kept for the duration specified by guidance from the professional association BANT which is currently 8 years.

8. **Website technical details**

The website www.nutritioninyork.co.uk uses cookies to collect information about how visitors use the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited. I use Google Analytics to analyse this data for website improvement and SEO purposes.

I do not make use of cookies to collect any private or personally identifiable information. The technical platform of my website uses cookies solely to aid the proper technical functioning of the website. The cookies used contain random strings of characters alongside minimal information about the state and session of the website – which in no way collects or discloses any personal information about you as a visitor.

Advanced areas of this site may use cookies to store your presentation preferences in a purely technical fashion with no individually identifiable information.

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

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

9. If you have a complaint regarding the use of your personal data then please contact me by writing to Nutrition in York, First Floor, 42 Oxford St. York YO24 4AW or email sallyduffin@nutritioninyork.co.uk .

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.