



## Wellbeing Nutrition

### General Data Protection Regulations (GDPR) Privacy Statement

**Data Controller: Beverley Mort trading as Wellbeing Nutrition**

**Data Protection Lead: Beverley Mort**

**Date of Policy: 30<sup>th</sup> May 2018**

This privacy statement is a source of information that explains how Wellbeing Nutrition (also referred to as 'we', 'I', 'us') will be processing (collecting, recording, storing, amending, reviewing, using and deleting) your personal information. It is a mandatory obligation under the General Data Protection Regulations for Wellbeing Nutrition to provide you with clear information on how and why we will be processing your information.

#### **What does this statement cover?**

- A description of the personal data we will be collecting.
- The legal basis on which the processing will take place.
- Sources of the personal data.
- Who we will share your personal data with.
- Whether your personal data will be transferred outside the EEA (European Economic Area), and if so how your data will be protected.
- Details about your rights concerning the processing of your personal data.

#### **What personal data do we collect and use?**

- Names, titles, photographs
- Contact information including address, telephone numbers, email address, skype address
- If there is a legitimate business interest, and where you have provided it, we may process information such as age, gender, date of birth, marital status, nationality, profession, qualifications, hobbies, family composition and dependants.
- As a healthcare organisation, the data we collect and process will be largely and likely to constitute sensitive personal data such as medical information, eating habits, weight and measurements, and religious beliefs.
- Where you have paid by BACS, financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers.

All personal data when not in the possession of Beverley Mort, is kept in a secure environment, either under lock and key (accessed only by Beverley Mort), and/or on a password protected (mobile phone) and encrypted laptop hard drive and/or USB stick. Any communication sent by Wellbeing Nutrition via email will be in password protected format. Data is only sent to a printer on a password protected network, and a clear desk policy is followed.

#### **The legal basis on which the processing of personal data will take place**

- The data you provide will largely be processed to provide you with a direct service and is necessary for the performance of a contract with you. For example, a one to one consultation, this may or may not include a monitoring or follow-up service.

- Some of our processing is necessary for compliance with a legal obligation, such as retaining and safeguarding records.
- The majority of data processing is to meet business aims and objectives, such as providing a service to meet the needs of a client. For example providing diet plans to suit a client's individual requirements/targets.

Wellbeing Nutrition will retain your data in a form that identifies you for no longer than is necessary for the purposes for which the personal data is processed. In exceptional circumstances we can only use your data if you consent. If we ask you for consent so that we can use your data for a particular purpose, we will remind you that you are free to withdraw your consent at any time and we will tell you how you can do this.

#### **Sources of the personal data.**

- You the client are the source of the majority of the personal information
- Where you may be referred by a medical practitioner, we will request that you provide any necessary test results which may be used as part of assessment to provide a service to meet your requirements. For example in the case of type II diabetes mellitus, you may want to provide your test results (e.g. HbA1c), and method of testing to help with diet planning and monitoring to meet your objectives.

#### **Who we will share your personal data with.**

You can be reassured that we will treat your personal data as strictly confidential. It will only be shared with third parties where it is necessary for the performance of our tasks or where you first give us your prior consent, for example to inform your GP about the service you are receiving.

#### **Transfer outside EEA**

It is highly unlikely that your personal data will be transferred outside the EEA, but if it is we will ensure that we will comply with the applicable legal requirements when transferring personal data outside the EEA. Our website is accessible from overseas so on occasion some personal data (for example, name and location on a testimonial) may be accessed from overseas, however it is our general practice only to publish comments where permission has been previously obtained.

#### **Your rights**

If you wish to access your personal data or exercise any of your rights you should contact Beverley Mort at Wellbeing Nutrition who will first ask for verification of your identity for security reasons. In such cases we will need you to respond with proof of your identity before you can exercise your rights listed below.

- You have the right to ask us to rectify, block, complete and delete your personal data, to restrict its use, and to 'port' your personal data (that is to ask us to provide it to you in a structured, commonly used and machine readable format and to transmit it directly to another organisation). You also have the right to request a copy of your personal data. Initial requests will incur no fee, but subsequent requests may be subject to an administration fee.
- You have the right to object to the processing of your data by us in some circumstances, for example where we don't have to process the data to meet a contractual or other legal requirement (such as to bring or defend legal claims).
- You have the right to withdraw consent to the processing of personal data, via any of the contact details listed below.
- You have the right to tell us how you would like us to deal with your personal data in the event of your death
- There are some exceptions to these rights however. For example, it will not be possible for us to delete your data if we are required by law to keep it.

- You have the right to make a complaint to the data protection supervisory authority or seek a remedy through the courts if you believe that your rights have been breached.  
You can also contact the Information Commissioner's Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffee House, Water Lane, Wilmslow, Cheshire. SK 9 5AF.

### **Data breaches**

If data is lost or it is suspected that someone has access to the data without permission, Beverley Mort will inform the Information Commissioner and affected individuals, in line with GDPR.

You are free to contact us at any time, if you have any queries or would like clarification on our policy.

[Beverley@wellbeingnutrition.co.uk](mailto:Beverley@wellbeingnutrition.co.uk)

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