

PRIVACY POLICY | UPDATED JUNE 2019

Hayley Down Nutrition is committed to protecting and respecting your privacy.

This page informs you of our policies regarding the collection, use and disclosure of personal data that you provide to us, through your use of our site www.hdnutrition.co.uk, including any information you may provide through our site when you purchase a product or service or sign up to our newsletter.

This document outlines how that information is used, who we may share that information with and how we keep it secure. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting www.hdnutrition.co.uk, you are accepting and consenting to the practices described in this policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, accessible from www.hdnutrition.co.uk.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at Hayley@hdnutrition.co.uk.

This policy only applies to our site. If you leave our site via a link or otherwise, you will be subject to the policy of that website provider. We have no control over that policy or the terms of the website and you should check their policy before continuing to access the site.

1. Use of Data

We may collect and process the following data about you:

- **Direct interactions:** You may provide data by filling in forms on our site (or otherwise) or by communicating with us by post, phone, email or otherwise, including when you:
 - order our products or services;
 - subscribe to our service or publications;
 - request resources or marketing be sent to you;
 - give us feedback
 - complete a health questionnaire or booking form
- **Third parties or publicly available sources:** We may receive personal data about you from various third parties and public sources as set out below
 - Technical Data from the following parties:
 - analytics providers such as Google based outside the EU;
 - advertising networks [such as Facebook, Twitter, LinkedIn and YouTube based [inside **OR** outside] the EU]; and

- search information providers [such as Google based [inside **OR** outside] the EU].
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services [such as Stripe based [inside **OR** outside] the EU]. **Stripe**. Their Privacy Policy can be viewed at <https://stripe.com/us/privacy>
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

This may include the following information:

- **Identity Data** may include your first name, maiden name, last name, username, marital status, title, date of birth and gender.
- **Contact Data** may include your billing address, delivery address, email address and telephone numbers.
- **Financial Data** may include your bank account and payment card details.
- **Transaction Data** may include details about payments between us and other details of purchases made by you.
- **Technical Data** may include your login data, internet protocol addresses, browser type and version, browser plug-in types and versions, time zone setting and location, operating system and platform and other technology on the devices you use to access this site.
- **Profile Data** may include your username and password, purchases or orders, your interests, preferences, feedback and survey responses.
- **Usage Data** may include information about how you use our website, products and services.
- **Marketing and Communications Data** may include your preferences in receiving marketing communications from us and our third parties and your communication preferences.
- **Sensitive data** may include health information that you provide in order to provide you with direct healthcare, including your previous medical history, dietary, lifestyle, supplement and medicine details, biochemical test results, clinic notes, health improvement plans and GP contact information

Legal Basis for Processing Personal Data Under General Data Protection Regulation (GDPR)

If you are from the European Economic Area (EEA), Hayley Down Nutrition legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it.

Hayley Down Nutrition may process your Personal Data because:

- We need to perform a contract with you
- You have given us permission to do so
- The processing is in our legitimate interests and it's not overridden by your rights
- For payment processing purposes
- To comply with the law

Information we get from other sources

We may obtain sensitive medical information in the form of test results from biochemical testing companies. 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.

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.

How we use your personal data

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

We undertake at all times to protect your personal data, including any health and contact details, in a manner which is consistent with our duty of professional confidence and the 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 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. We may use your data for marketing purposes such as newsletters but this would be subject to you giving us your express consent.

Do you share my information with other organisations?

We 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:

- 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)

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.

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 Hayley@hdnutrition.co.uk Under special circumstances, some information may be withheld. 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, 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 ANP.
- 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

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 the Data Controller at Hayley@hdnutrition.co.uk

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.

Hayley Down Nutrition 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).

How long do you hold confidential information for?

All records held by Hayley Dow Nutrition will be kept for the duration specified by guidance from our professional association ANP.

Website technical details

We do use electronic forms on our website making use of an available 'forms module' which has a number of built-in features to help ensure privacy. We also aim to use secure forms where appropriate.

IP addresses and cookies

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual and we will not collect personal information in this way.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site.

Cookies are small. 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. 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. Note also our statement on analytics software below – as analytics software also uses cookies to function.

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>

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. We use an analytics package called Google Analytics who provide details of their [privacy policy](#) on the Google website.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access

Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. However, we advise that you check this page regularly to keep up to date with any necessary changes.

Complaints

If you have a complaint regarding the use of your personal data then please contact us by writing to the Data Controller at hayley@hdnutriion.co.uk 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.