

PETRA FULHAM NUTRITION PRIVACY POLICY 2019

Petra Fulham Nutrition holds some information about you and respects your right to privacy.

Therefore 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 the petrafulham@gmail.com. We keep our Privacy Notice under regular review. This Privacy Notice was last reviewed in January 2019 and it is our right to change this policy at any time.

What We Do:

Petra Fulham Nutrition provides nutritional therapy services to clients to improve their health through diet and lifestyle interventions. We 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, we aim to understand the underlying causes of your health issues which we will seek to address through personalised dietary therapy, nutraceutical prescription (supplements) and lifestyle advice. We also provide nutrition and lifestyle advice and information to audiences through workshops and seminars.

How We Obtain Your Personal Data:

Information provided by you. You provide us with personal data in the following ways:

- 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
- 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

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.

Following completion of your healthcare we retain your personal data for the period defined by our professional association, NTOI. 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.

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:

- Our professional body NTOI, 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, 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 Petra Fulham at petrafulham@gmail.com.

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 NTOI 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

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 Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland or email petrafulham@gmail.com.

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.

How long do you hold confidential information for?

All records held by Petra Fulham Nutrition will be kept for the duration specified by guidance from our professional association NTOI.

Website Details:

Forms:

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.

Cookies:

The WIX platform (our website platform) adheres with the European Union Cookie Law.

WIX uses the following cookies -

Session (Transient) cookies: these cookies are erased when you close your browser, and do not collect information from your computer. They typically store information in the form of a session identification that does not personally identify the user.

Persistent (Permanent/Stored) cookies: these cookies are stored on your hard drive until they expire (i.e based on a set expiration date) or until you delete them. These cookies are used to collect identifying information about the user, such as Web surfing behaviour or user preferences for a specific site.

In compliance with EU legislation, the following table lists the use of cookies on this web site:

Cookie name	Life span	Purpose
svSession	Persistent	Identifies unique visitors and tracks a visitor's sessions on a site
hs	Session	Security
XSRF-TOKEN	Persistent	Security
smSession	Persistent (Two weeks)	Identifies logged in site members
TSxxxxxxx (where x is replaced with a random series of numbers and letters)	Persistent	Security
TSxxxxxxx_d (where x is replaced with a random series of numbers and letters)	Persistent	Security
RequestID	Session	Track visitor behavior and measure site performance

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.

Complaints:

If you have a complaint regarding the use of your personal data then please contact us by writing to the Data Controller at at Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland or email petrafulham@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 Data Protection Commissioner at www.dataprotection.ie