

Privacy Notice and GDPR Compliance

Nutritional NRG (Natalie R Gillan) 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. If this notice misses some items or further clarification is required, then please contact us at nrg@nutritional-energy.co.uk. We keep our Privacy Notice under regular review. This Privacy Notice was last reviewed in May 2020.

1. What We Do

Nutritional NRG (Natalie R Gillan) 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 (supplements) prescription and lifestyle advice.

2. 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 nutritional therapy consultations; and,
- through email, by telephone or by post.

This may include the following information:

- basic details such as name, address, contact details and date of birth;
- contacting details 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; and,
- GP contact information.

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 BANT, registrant body CNHC and Professional Indemnity Insurance.

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 (i.e. specialists, etc). The provision of this information is subject to you giving us your express consent at your initial consultation. 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.

3. 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 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 information purposes such as emails but this would be subject to you giving us your express consent.

4. 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 registrant body, CNHC and our professional association, BANT, only for processing of a complaint made by you;
- anyone to whom we may transfer our rights and duties under any agreement we have with you; and,
- any legal or crime prevention agencies and/or to satisfy any regulatory request (e.g. CNHC) if we have a duty to do so or if the law allows us to do so.

We may share your contact information only 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 on to 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, online forums, and through publishing in medical journals, 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. 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 nrg@nutritional-energy.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; and,
- persons or entities with whom we are sharing/shared 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 BANT, CNHC and Professional Indemnity Insurance 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; and,
- 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 nrg@nutritional-energy.co.uk.

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 (including Highgate Private Hospital, biochemical testing laboratories, supplement companies, when applicable) 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.

Nutritional NRG (Natalie R Gillan) is registered with the Information Commissioner's Office (ICO) as a data controller and collects data for healthcare purposes only. 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 records held by Nutritional NRG (Natalie R Gillan) will be kept for the duration specified by guidance from our professional association BANT, registrant body CNHC and Professional Indemnity Insurance.

8. Analytics

Unlike most websites, we do not use analytics software and we do not collect any data from our website visitors.

9. Complaints

If you have a complaint regarding the use of your personal data, then please contact us by writing to the Data Controller at nrg@nutritional-energy.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.