General Outline

Our Privacy Statement governs any kind of processing where we are acting as a data controller or co-controller (including collection, use, transfer, storage and deletion) of personally identifiable information (any information that may be used to identify a physical person, and any other information associated therewith) about natural persons. This statement applies to our processing of data collected through any means, actively as well as passively, from persons located anywhere in the world.

We are guided by the following principles when processing data:

1. We will only collect data for specific and specified purposes; we will make it clear at the point when we request your information, what we are collecting it for and how we are going to use it;

2. We will not collect data beyond what is necessary to accomplish those purposes; we will minimise the amount of information we collect from you to what we need to deliver the services required.

3. We will collect and use your personal information only if we have sensible business reasons for doing so, such as relevant offers or to provide you with coaching services.

4. We will not use your data for purposes other than those for which it was collected, accepted as stated within our policy, or with your prior consent.

5. We will seek to verify and/or update your data periodically and we will accept requests from you for amendment of the data held.

6. We will apply high technical standards to make our processing of data secure.

7. Except otherwise stated, we will not store data in identifiable form longer than is necessary to accomplish its purpose or as required by law.

INFORMATION COLLECTED

The information we may collect about you could include, but is not limited to:

- 1. Personal details
- 2. Family details

- 3. Lifestyle and social circumstances
- 4. Financial details
- 5. Physical or mental health details
- 6. Racial or ethnic origin

If we were to obtain special category data from you, we will always get your consent first.

We will collect information from you when:

- 1. You sign up to our newsletter or mailing list
- 2. You download an opt-in
- 3. You join a course or programme

4. You contact us for information via our website or social media channels, by phone or email

5. You post on our social media channels, website, or blog

6. You work with us in a commercial capacity

We may use the information collected to:

1. Allow you to process a booking for a product or course

2. Create a profile for you on our site

3. Send you our newsletters or provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes

4. Ensure that content from our site is presented to you in the most effective manner for you and your computer

5. Allow you to participate in the service you have chosen to do so

6. Notify you about changes to our service

INFORMATION STORAGE

We will never sell your information to third parties.

We may use external third parties to provide systems and technology which involves them processing personal data, necessitating a transfer of that personal data. For example, our email system Microsoft Office 365.

We store your data on our own server based in the UK and any backups to the cloud are done via secure encrypted backup systems. Non encrypted data is not stored on US based servers and all our systems are behind a secure network firewall providing persistent threat management to provide an Intrusion Prevention System (IPS) and Intrusion Detection System (IDS).

INFORMATION SHARING

We may share your personal data with your referrer, other healthcare professionals or your health insurers if you specifically request this and have consented to it.

We may be required to share personal data (for example with your GP or with the emergency services) if we consider that there is a real risk of harm to you or to others.

SUBJECT ACCESS REQUESTS

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it. This is known as a "subject access request".

All subject access requests should be made in writing and sent to gdpr@thelonghauldietitian.co.uk

There is not normally any charge for a subject access request. And we will respond to your subject access request within one month of receiving it.

LEGAL BASIS FOR PROCESSING YOUR DATA

The General Data Protection Regulation (GDPR) provides that processing of your data shall only be lawful if and to the extent that at least one of the following applies:

- 1. You have consented
- 2. For the performance of a contract
- 3. For compliance with a legal obligation which we must perform

- 4. To protect vital interests of your or another person
- 5. It is in the public interest
- 6. It is in the legitimate interests pursued by us or a third party

We collect data for the purposes set out above. Data is managed to ensure that it is either erased from our system when it is no longer required for the purpose for which it was collected, retained for legal reasons, or minimised and retained.

Any health data collected from you has special protection and is limited to that permissible by law. In all instances where special category data is collected, we will obtain your express consent.

LINKS FROM OUR SITE

Our site contains links to and from other websites which are operated by individuals and companies over which we have no direct control. If you follow a link to any of these websites, please note that these websites have their own privacy and terms of use polices. We do not accept any responsibility or liability for these policies. We advise you to check the policies for third party sites before you submit any personal data to the website.

MARKETING EMAILS

We will make it as easy as we can for you to opt out of unwanted processing, providing it does not restrict our ability to provide you with the primary service you have requested.

Please note if you wish to unsubscribe from any marketing emails that you have signed up for, you can do so by emailing unsubscribe@thelonghauldietitian.co.uk.

WEBSITE ANALYTICS & TARGETED MARKETING

We use website analytics to provide the best user experience and service to you and to evaluate and improve our site. We ose third party data analytics service providers GoDaddy and Google Analytics to improve our visibility and to monitor website browser behaviour and navigation across our site.

These third-party data analytics service providers collect this information on our behalf in accordance with our instructions and in line with their own privacy policies. Our service providers may collect the following data about the way you use our site, which will almost always be anonymised and aggregated before reporting back to us:

1. Number of visitors to our site.

- 2. Pages visited whilst using the site and time spent per page.
- 3. Page interaction information, such as scrolling, clicks and browsing methods.
- 4. Source location and details about where users go when they leave the site.
- 5. Page response times and any download errors; and
- 6. Other technical information relating to end user device, such as IP address or browser plug-in.

From time to time we may use the information collected about you within the analytics context, to present you with targeted advertisements using platforms such as Facebook, Twitter, Google and/or Instagram.

CHANGES TO OUR POLICY & FUTURE PROCESSING

We do not intend to process your personal information except for the reasons stated within this privacy notice. If this changes, this privacy notice will be amended and placed on our website at http://www.thelonghauldietitian.co.uk/privacy-policy.

POLICY DETAILS

We continually review our privacy practices and may change our policy and privacy statement from time to time. When we do this an amended privacy statement will be placed on our website at www.thecalmgutdietitian.com

This privacy notice was published on 06/02/24 and last updated on 06/02/24.

If you are concerned about how we are collecting, using and/or sharing your personal information, you can contact our Data Protection Officer <u>paul@thelonghauldietitian.co.uk.</u>