**Privacy policy**

SimpleFood SimpleHealth holds some information about you. This document

outlines how that information is used, who I may share that information with and

how I keep it secure. This notice does not provide exhaustive detail. However, I am

happy to provide any additional information or explanation needed. Any requests

for this should be sent to sfshnutrition@gmail.com. I keep my Privacy Notice

under regular review. This Privacy Notice was last reviewed in June 2024.

**What I do**

SimpleFood SimpleHealth provides nutritional therapy and health coaching services to clients to improve their health through diet and lifestyle interventions. I 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, I aim to understand the underlying causes of

your health issues which I will seek to address through personalised dietary

therapy, nutraceutical prescription (supplements) and lifestyle advice.

How I obtain your personal data Information provided by you.

You provide me 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 I 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

I use this information in order to provide you with direct healthcare. This means

that the legal basis of me holding your personal data is for legitimate interest.

Following completion of your healthcare I retain your personal data for the period

defined by our professional association BANT and registrant body, the

Complementary and Natural Healthcare Council (CNHC). This enables me to

process any complaint you may make. In this case the legal basis of me holding

your personal data is for contract administration.

**Information I get from other sources**

I may obtain sensitive medical information in the form of test results from

biochemical testing companies. I use this information in order to provide you

with direct healthcare. This means that the legal basis of me holding your

personal data is for legitimate interest.

I may obtain sensitive information from other healthcare providers. The provision

of this information is subject to you giving me your express consent. If I do not

receive this consent from you, I will not be able to coordinate your healthcare

with that provided by other providers which means the healthcare provided by I

may be less effective.

**How I use your personal data**

I act as a data controller for use of your personal data to provide direct healthcare.

I 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. I act

as a data controller and processor in regard to the processing of credit card and

online payments.

I always undertake 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 UK General Data Protection Regulation

(UK GDPR) concerning data protection. I will also take reasonable security

measures to protect your personal data storage.

I 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. I 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?

I will keep information about you confidential. I 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, for the

processing of a complaint made by you

• Any contractors and advisors that provide a service to me or act as my

agents on the understanding that they keep the information confidential

• Anyone to whom I may transfer our rights and duties under any

agreement I have with you

• Any legal or crime prevention agencies and/or to satisfy any regulatory

request (e.g., CNHC) if I have a duty to do so or if the law allows us to do so

I may share your information with supplement companies and biochemical

testing companies as part of providing you with direct healthcare. I will not

include any sensitive information.

I will seek your express consent before sharing your information with your GP or

other healthcare providers. However, if I believe that your life is in danger then I

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.

I may share your case history in an anonymised form with my 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. I 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 them, 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 sfshnutrition@gmail.com. Under special circumstances, some

information may be withheld. I shall respond within 20 working days from the

point of receiving the request and all necessary information from you. My

response will include the details of the personal data I hold on you including:

• Sources from which I acquired the information

• The purposes of processing the information

• Persons or entities with whom I am 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 me to stop processing information about you where I am not required

to do so by law or in accordance with the BANT and CNHC guidelines

• Receive a copy of your personal data, which you have provided to me, in a

structured, commonly used and machine-readable format and have the

right to transmit that data to another controller, without hindrance from

me

• Object at any time to the processing of personal data concerning you

I do not carry out any automated processing, which may lead to automated

decisions based on your personal data.

If you would like to invoke any of the above rights then please

email sfshnutrition@gmail.com.

What safeguards are in place to ensure data that identifies me is secure?

I only use information that may identify you in accordance with UK GDPR. This

requires me 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, I 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. I 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.

I also ensure the information I 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). I 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.

SimpleFood SimpleHealth/Louise Essex is 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 site (search by business name).

**How long do you hold confidential information for?**

All records held by SimpleFood SimpleHealth will be kept for the duration specified

by guidance from our professional association BANT.

• Site technical details

• Forms

• I use electronic forms on my site making use of an available ‘forms module’

which has a number of built-in features to help ensure privacy. I also aim

to use secure forms where appropriate.

Cookies

I use cookies to collect information about how visitors use my site. I use the

information to compile reports and to help me improve the site. The cookies

collect information in an anonymous form, including the number of visitors to the

site, where visitors have come to the site from and the pages they visited.

Cookies are small. I do not make use of cookies to collect any private or personally

identifiable information. The technical platform of this site uses cookies solely to

aid the proper technical functioning of the site. The cookies used contain random

strings of characters alongside minimal information about the state and session

of the site – 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 the statement on analytics software below – as analytics

software also uses cookies to function.

Most 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 sites

visit <http://tools.google.com/dlpage/gaoptout>

**Analytics**

Like most sites, I make use of analytics software in order to help me understand

the trends in popularity of my site and of different sections. I make no use of

personally identifiable information in any of the statistical reports I use from this

package. I use an analytics package called Google Analytics who provide details

of their privacy policy on the Google site.

**Complaints**

If you have a complaint regarding the use of your personal data then please

contact me by emailing info@lauranaylornutrition.com and I will do my 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.