

PRIVACY NOTICE AND DATA PROTECTION POLICY STATEMENT

PRIVACY NOTICE

This Privacy Notice is provided to you by Nutritionwise which is the data controller for your personal data.

Your personal data – what is it?

“Personal data” is any information about a living individual which allows them to be identified from that data (for example a name, photographs, videos, email address, or address). Identification can be directly using the data itself or by combining it with other information which helps to identify a living individual. The processing of personal data is governed by legislation relating to personal data which applies in the United Kingdom including the General Data Protection Regulation (the “GDPR”) and other legislation relating to personal data and rights such as the Human Rights Act.

This personal information must be dealt with properly and securely however it is collected, recorded and used – whether on paper, in a computer, or recorded on other material – and there are safeguards to ensure this in the GDPR.

Nutritionwise regards the lawful and correct treatment of personal information as very important to the successful and efficient performance of its functions, and to maintain the confidence of those with whom it deals.

To this end Nutritionwise fully endorses and adheres to the Principles of Data Protection, as set out in the GDPR.

Purpose

The purpose of this policy is to ensure that the clients of Nutritionwise are clear about the purpose and principles of Data Protection and to ensure that Nutritionwise has guidelines and procedures in place which are consistently followed.

Failure to adhere to GDPR is unlawful and could result in legal action being taken against Nutritionwise, or its employees handling data.

Principles

GDPR regulates the processing of information relating to living and identifiable individuals (data subjects). This includes the obtaining, holding, using or disclosing of such information, and covers computerised records as well as manual filing systems and card indexes.

Data users must comply with the data protection principles of good practice which underpin GDPR. To comply with the law, information must be collected and used fairly, stored safely and not disclosed to any other person unlawfully.

Your rights and your personal data

You have the following rights with respect to your personal data:

When exercising any of the rights listed below, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.

The right to access personal data we hold on you

At any point you can contact us to request the personal data we hold on you as well as why we have that personal data, who has access to the personal data and where we obtained the personal data from. Once we have received your request we will respond within one month.

There are no fees or charges for the first request but additional requests for the same personal data or requests which are manifestly unfounded or excessive may be subject to an administrative fee.

The right to correct and update the personal data we hold on you

If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated.

The right to have your personal data erased

If you feel that we should no longer be using your personal data or that we are unlawfully using your personal data, you can request that we erase the personal data we hold.

When we receive your request we will confirm whether the personal data has been deleted or the reason why it cannot be deleted (for example because we need it to comply with a legal obligation).

The right to object to the processing of your personal data or to restrict it to certain purposes only

You have the right to request that we stop processing your personal data or ask us to restrict processing. Upon receiving the request we will contact you and let you know if we are able to comply or if we have a legal obligation to continue to process your data.

The right to data portability

You have the right to request that we transfer some of your data to another controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.

The right to withdraw your consent

You have the right to withdraw your consent at any time for any processing of data to which consent was obtained. You can withdraw your consent easily by telephone, email, or by post (see Contact Details below).

The right to lodge a complaint with the Information Commissioner's Office.

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Storage

Personal data may be kept in paper-based systems and on a password-protected computer system. Paper-based data are stored in organised and secure systems.

Use of Photographs

Where practicable, we will seek consent from clients before displaying photographs in which

they appear. If this is not possible (for example, a large group photo), we will remove any photograph if a complaint is received. This policy also applies to photographs published on Nutritionwise's website update, circular emails and similar.

Consent

Written consent is not requested on the basis that Nutritionwise has a legitimate interest as it is assumed that the consent has been granted when an individual freely gives their own details.

Personal data will not be passed on to anyone outside without explicit consent from the data owner unless there is a legal duty of disclosure under other legislation.

Transfer of Data Abroad

Any personal data transferred to countries or territories outside the European Economic Area ("EEA") will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the European Union.

Further processing

If we wish to use your personal data for a new purpose, not covered by this Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

Changes to this notice

We keep this Privacy Notice under regular review and we will place any updates on the website: <http://www.nutritionwise.uk> This Notice was last updated in May 2018.

Contact Details

Please contact us if you have any questions about this Privacy Notice or the personal data we hold about you or to exercise all relevant rights, queries or complaints at:

The Data Controller
Nutritionwise
elaine@nutritionwise.uk

POLICY STATEMENT

Nutritionwise as a body is a DATA CONTROLLER under the Act, and also a DATA PROCESSOR and is ultimately responsible for this policy's implementation.

The following procedures have been developed in order to ensure that we meet its responsibilities in terms of Data Protection.

Data Records Purposes

Nutritionwise obtains personal data (such as names, addresses, phone numbers and email and website addresses) from clients and others. This data is obtained, stored and processed solely to assist personnel in the efficient running of Nutritionwise and its activities. Personal details supplied are only used to send material that is potentially useful. Most of this information is stored securely in paper form or on the Data Controller's personal laptop or PC in the form of the Nutritionwise database and other related documents.

Nutritionwise will process some or all of the following personal data where necessary to perform its tasks:

- Contact details such as names, telephone numbers, addresses, email/website addresses

Nutritionwise will process this data for some or all of the following purposes:

- Where the data is relevant to Nutritionwise fulfilling its aims to the client
- To send you emails with information about Nutritionwise activities (eg workshops), events, reports, updates and projects arranged by Nutritionwise
- When undertaking a mailing to persons whose personal details are held by Nutritionwise, emails will be sent using the 'blind copy' facility

Consent

Written consent is not requested on the basis that Nutritionwise has a legitimate interest as it is assumed that the consent has been granted when an individual freely gives their own details.

Personal data will not be passed on to anyone outside Nutritionwise without explicit consent from the data owner unless there is a legal duty of disclosure under other legislation.

Access

Only the Director of Nutritionwise and employees involved in the running of Nutritionwise will normally have access to personal data.

All such employees or volunteers are made aware of the Data Protection Policy and their obligation not to disclose personal data to anyone who is not supposed to have it.

Information supplied is kept in a secure filing, paper and electronic system and is only accessed by those individuals involved in the running of Nutritionwise.

Information will not be passed on to anyone outside SENSE without their explicit consent, excluding statutory bodies eg HM Revenue and Customs.

Individuals will be supplied with a copy of any of their personal data held by the Nutritionwise if

a request is made.

Accuracy

Nutritionwise will take reasonable steps to keep personal data up to date and accurate.

Personal data will be stored for as long as the individual continues to be a member and normally longer. Where a client ceases to be a client and it is not deemed appropriate to keep their records, their records will be destroyed. However, unless we are specifically asked by an individual to destroy their details, we will normally keep them on file for future reference.

If a request is received from a client to destroy their records, we will remove their details from the database. This work will be carried out by the Data Controller.

Storage

Personal data may be kept in paper-based systems and on a password-protected computer system. Paper-based data are stored in organised and secure systems.

Use of Photographs

Where practicable, Nutritionwise will seek consent of clients before displaying photographs in which they appear. If this is not possible (for example, a large group photo), Nutritionwise will remove any photograph if a complaint is received.

Responsibilities of volunteers

During the course of their duties with the Nutritionwise, any volunteer (graduate) will be dealing with information such as names/addresses/phone numbers/e-mail addresses of clients. They may be told or overhear sensitive information while working for Nutritionwise. The GDPR gives specific guidance on how this information should be dealt with. In short to comply with the law, personal information must be collected and used fairly, stored safely and not disclosed to any other person unlawfully. Personnel, paid or unpaid, must abide by this policy.