



**Eat Well, Be Healthy,
Perform Better**

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PRIVACY NOTICE

I, Jo Scott-Dalgleish, hold 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 nutritionalsolutions@live.co.uk. I keep my Privacy Notice under regular review. This Privacy Notice was last reviewed in October 2018.

1. What I Do

I provide nutritional therapy services to clients to improve their health and performance through diet and lifestyle interventions. I focus on the optimisation of physical and mental health, preventative healthcare 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 and performance issues which I will seek to address through personalised dietary therapy, nutraceutical prescription (supplements) and lifestyle advice.

2. How I Obtain Your Personal Data

Information provided by you

You provide me with personal data in the following ways:

- By completing a contact form on my website
- By completing a nutrition and health questionnaire
- By signing a terms of engagement form
- During a nutritional therapy consultation
- Through email, over the telephone or by post
- By making online payment

This may include the following information:

- contact details, including email address and mobile phone number
- basic details such as name, address and date of birth
- details of contact I have had with you such as referrals and appointment requests
- health information including your previous medical history, dietary, lifestyle, training, supplement and medicine details, biochemical test results, clinic notes and health and performance improvement plans
- GP contact information
- Bank details

I use this information to provide you with direct healthcare. This means that the legal basis of my holding your personal data is for legitimate interest.

Following completion of your healthcare, I retain your personal data for the period defined by my professional association, BANT, and my registrant body, The Complementary and Natural Healthcare Council (CNHC), which is 8 years. This enables me to process any complaint you may make. In this case the legal basis of my 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 to provide you with direct healthcare. This means that the legal basis of my 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 me may be less effective.

3. 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 regarding the processing of your data from third parties such as testing companies and other healthcare providers. I act as a data controller and processor regarding the processing of online payments.

I undertake always to protect your personal data, including any health and contact details, in a manner which is consistent with my duty of professional confidence and the requirements of the General Data Protection Regulation (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. 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 me your express consent.

4. 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, except for the following categories of third parties:

- My registrant body, CNHC, and my 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 my rights and duties under any agreement I have with you
- Any legal or crime prevention agencies and/or to satisfy any regulatory request (eg, CNHC) if we 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 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.

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 nutritionolutions@live.co.uk. Under exceptional 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 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

I 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 18 Blandford Road, London, W4 1DU or email nutritionolutions@live.co.uk.

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

I only use information that may identify you in accordance with 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 must also 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 me 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.

Joanna Louise Scott-Dalgleish 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 website (search by name).

7. How long do you hold confidential information for?

All records held by Jo Scott-Dalgleish will be kept for the duration specified by guidance from her professional association BANT, currently 8 years from the date of last contact.

8. Website technical details

a. Forms

I do use electronic forms on my website making use of an available 'forms module' which has a several built-in features to help ensure privacy. I also aim to use secure forms where appropriate.

b. Cookies

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

Cookie name	Purpose
AcceptCookies	This is used to store whether you have agreed to receive cookies. Persistent for one year.
Google Analytics _utma _utmb _utmc _utmz	These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us 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 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 my 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>

9. Analytics

Like most websites, I make use of analytics software to help me understand the trends in popularity of my website 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 website.

10. Complaints

If you have a complaint regarding the use of your personal data then please contact me by writing to the Data Controller at 18 Blandford Road, London, W4 1DU or email nutritionolutions@live.co.uk 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.