



Clare Thompson Nutrition

look, feel, be your best

PRIVACY NOTICE & COOKIES POLICY FOR CLARE THOMPSON NUTRITION LIMITED

Clare Thompson Nutrition Limited 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. This notice does not provide exhaustive detail. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to clare@clarethompsonnutrition.co.uk. We keep our Privacy Notice under regular review. This Privacy Notice was last reviewed in June 2022.

1. What We Do

Clare Thompson Nutrition Limited 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 prescription (supplements) and lifestyle advice.

2. Introduction

- 2.1 We are committed to safeguarding the privacy of our website visitors and service users.
- 2.2 This policy applies where we are acting as a data controller with respect to the personal data of our website visitors and service users; in other words, where we determine the purposes and means of the processing of that personal data.
- 2.3 We use cookies on our website. Insofar as those cookies are not strictly necessary for the provision of our website, we will ask you to consent to our use of cookies when you first visit our website.

3. How we use your personal data

- 3.1 In this Section 3 we have set out:
 - (a) the general categories of personal data that we may process;
 - (b) the purposes for which we may process personal data; and
 - (c) the legal bases of the processing.
- 3.2 We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely for monitoring and improving our website and services.

- 3.3 We may process your account data ("**account data**"). The account data may include your name and email address. The source of the account data is you. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is consent namely for the proper administration of our website and business.
- 3.4 We may process information contained in any enquiry you submit to us regarding bookings or services ("**enquiry data**"). The enquiry data may be processed for the purposes of offering, marketing and selling relevant services to you. The legal basis for this processing is consent.
- 3.5 We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("**notification data**"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is consent.
- 3.6 Please do not supply any other person's personal data to us unless we prompt you to do so.

4. How We Obtain Your Personal Data

4.1 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 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 we 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

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 and registrant body, CNHC. This enables us to process any complaint you may make. In this case the legal basis of our holding your personal data is for contract administration.

4.2 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. The provision of this information is subject to you giving us your express consent. 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.

5. 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 UK General Data Protection Regulation (UK 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 marketing purposes such as newsletters but this would be subject to you giving us your express consent.

6. 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, for the processing of a complaint made by you
- Any contractors and advisors that provide a service to us or act as our agents on the understanding that they keep the information confidential
- Anyone to whom we may transfer our rights and duties under any agreement we 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.
- We may use third-party Service Providers to manage your personal data.

Practice Better

Practice Better is an electronic practice management tool which stores health records, appointment information, and communication between practitioners and clients.

For more information on the privacy practices of Practice Better, please visit the Practice Better Privacy web page:

<https://practicebetter.io/privacy/>

MailerLite

We use MailerLite to manage our email marketing subscriber list and to send emails to our subscribers. MailerLite is a third-party provider, which may process your data using industry-standard technologies to help us monitor and improve our newsletter.

MailerLite's privacy policy is available at <https://www.mailerlite.com/legal/privacy-policy>

You can unsubscribe from our newsletter by clicking on the unsubscribe link provided at the end of each newsletter.

We may share your information 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 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.

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, conferences, online forums, and through publishing in medical journals, trade magazines or online professional sites. We will seek your explicit consent before processing your data in this way.

7. 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 clare@clarethompsonnutrition.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
- Persons or entities with whom we are 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 us to stop processing information about you where we are 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

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 Clare Thompson Nutrition Limited or email clare@clarethompsonnutrition.co.uk.

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

Clare Thompson Nutrition Limited Company registration no. 13926882 Registered in England & Wales
Registered office is at: Shelton Cottage Platt Lane Keyworth Nottingham NG12 5GE

We only use information that may identify you in accordance with UK 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 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.

Clare Thompson Nutrition Limited 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 business name).

9. How long do you hold confidential information for?

All records held by Clare Thompson Nutrition Limited will be kept for the duration specified by guidance from our professional association BANT.

10. Website technical details

We use *Create.net* to host our website. You can view the privacy policy of this service provider at <https://www.create.net/about/privacy-policy>

Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

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>

11. Analytics

Like most websites, we make use of analytics software in order to help us understand the trends in popularity of our website and of different sections. We make no use of personally identifiable information in any of the statistical reports we use from this package. We use an analytics package called Google Analytics who provide details of their [privacy policy](#) on the Google website.

12. Complaints

If you have a complaint regarding the use of your personal data then please contact us by writing to the Data Controller at clare@clarethompsonnutrition.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.