

PRIVACY POLICY

INTRODUCTION

Welcome to Nurture for Life Nutrition's privacy policy.

We respect your privacy and we are committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website or use our services (Site) (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy policy.

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- 1. IMPORTANT INFORMATION AND WHO WE ARE**

PURPOSE OF THIS PRIVACY POLICY

We are Laura Vincent t/a Nurture for Life Nutrition, a sole trader business. Laura Vincent is a UK registered dietitian with the Health and Care Professions Council (HCPC) (registration number: DT 13892) and the British Dietetic Association (BDA).

This privacy policy aims to give you information on how Nurture for Life Nutrition collects and processes your personal data through your use of this website <https://nurture-for-life.com> (Site), including any data you may provide through the Site when you purchase a service.

This website is not intended for unsupervised use by children under 16 years old and any data we collect relating to children will be data provided on their behalf by their parent or guardian or in the presence of and with the consent of their parent or guardian.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

CONTROLLER

Nurture for Life Nutrition is the controller and responsible for your personal data (referred to as “we”, “us” or “our” in this privacy policy).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact our data privacy manager using the details set out below.

CONTACT DETAILS

If you have any questions about this privacy policy or our privacy practices, please contact our data privacy manager in the following ways:

Full name of legal entity: Laura Vincent t/a Nurture for Life Nutrition.

Email address: laura@nurture-for-life.com

Postal address: 36 Allée du Violon, Bonnetan, 33370, France

Telephone number: +33621618112

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

We keep our privacy policy under regular review. This version was published on 03/06/22.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

THIRD-PARTY LINKS

Our Site may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Site, we encourage you to read the privacy policy of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (**anonymous data**).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier, marital status, title, date of birth and gender, GP details, weight, height, medical records and medication.
- **Contact Data** includes details such as your address, personal telephone numbers and personal email address, information about your next of kin (for the purpose of emergency contact details);
- **Transaction Data** includes details about payments to and from you and other details of services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our Site.

- **Profile Data** includes your username and password, account details, orders made by you, your preferences, feedback and survey or questionnaire responses.
- **Usage Data** includes information about how you use our website, platform and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Special Categories of Personal Data:** We will also collect, in the course of, or for the purpose of providing the services, special categories of personal data. Special categories of data require a greater level of protection for the purposes of health and social care including medical diagnosis and the provision of health care or treatment provided that such data is processed by or under the responsibility of a professional who is subject to an obligation of professional secrecy. The special categories of personal data about you which we may collect include:
 - information about your health. This may include biometric information. We may collect such information from forms you fill in, from your health reports and medical records or it may be records of contact between us such as information about complaints or incidents, records of medical services you have received or and from video footage of you (such as from video call sessions which may be recorded);
 - information about other healthcare providers (such as your GP and practice details);
- **Aggregated Data:** We also collect, use and share anonymised and aggregated data ("Aggregated Data") such as statistical or demographic data for our own internal and marketing purposes. Aggregated Data is be indirectly reveal your identity. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

IF YOU FAIL TO PROVIDE PERSONAL DATA : Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel the services you have ordered but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Identity and Contact Data by filling in forms and our client health questionnaire or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply for our services;
- create an account on our Site;
- subscribe to our service or publications;
- request marketing to be sent to you;
- complete a questionnaire or survey;
- give us feedback or contact us; or
- attend an appointment via telephone or video call.

Automated technologies or interactions. Please see our cookie policy for more information.

Third parties or publicly available sources:

- from your parents or guardians (if you are under the age of 18) who provide us with information about you and from other healthcare professionals and officers in the local authority/ social services department.
- as required to provide you with our services;
- we receive referrals from organisations to whom you have given consent;
- we may receive or share information from or with regulators such as the Information Commissioner's Office and the Health Service Ombudsman and other relevant health professionals, authorised health service providers and for the purposes of practice research and quality assurance and improvement.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation
- Processing is necessary for medical diagnosis and the provision of healthcare.

See the Glossary, below to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact (c) details of your condition	Performance of a contract with you Consent To comply with a legal/regulatory obligation Necessary for the management of health and social care services
To process and deliver services including: managing your appointments and video calls (which may be recorded), telephone calls, (which may be recorded) in each case for monitoring and training purposes, receiving and sharing and keeping medical records	(a) Identity (b) Contact (c) Transaction (d) Special categories of personal data (e) Marketing and Communications	Performance of a contract with you and necessary for us to provide you with healthcare Necessary for our legitimate interests To comply with our legal/ regulatory obligations Necessary for the management of health and social care services Consent Protection of your vital interests
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to complete a form/ questionnaire (c) making records of your assessments or receiving records from other health care providers (d) handling complaints	(a) Identity (b) Contact (c) Profile (d) Special categories of personal data (e) Marketing and Communications	Performance of a contract with you and necessary for us to provide you with healthcare Necessary to comply with a legal/ regulatory obligation Necessary for our legitimate interests (to keep our records updated and to study how you use our services) Necessary for the management of healthcare Protection of your vital interests
To administer and protect our business and this Site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)

	(d) Usage (e) Marketing and Communications (f) Technical	
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences, analysing the quality of care delivered to our patients as part of our continuing service improvement.	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our Site updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about products or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

See the **Glossary** below to find out more about the types of lawful basis that we will rely on to process your personal data.

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased services from us and you have not opted out of receiving that marketing.

THIRD-PARTY MARKETING

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

OPTING OUT

You can ask us or third parties to stop sending you marketing by following the opt-out links on any marketing message sent to you or by contacting us at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a purchase of services or other transactions.

COOKIES

Please see our cookie policy. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note it may be that some parts of our Site may become inaccessible or not function properly.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with the parties set out below for the purposes set out in the table “*Purposes for which we will use your personal data*” above.

- Third Parties as set out in the Glossary
- Specific third parties such as your GP or other healthcare providers.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

There are some other rare occasions where we may share your data with other organisations.

- We may share information with emergency services if there is an immediate risk of harm to you or other people, or there is a legal requirement to do so;
- We may share information with our professional advisors, including lawyers and accountants, if this is necessary to take and receive professional advice (including legal advice), or to bring or defend a legal claim or threatened claim.
- We may share information with individuals or organisations if we are legally required to, for example if this is specified in a warrant or court order.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

Our practice management provider (who keep our client records), currently Green Patch Inc. t/a Practise Better, are based in the US and we need to share your records with them as processor. We have in place appropriate safeguards in accordance with Article 46(2) of the UK GDPR .

When you make payment for our services, you will be sharing your financial details directly with Stripe (a global entity) and in such case, data will be transferred outside the UK and the EU. Please see Stripe’s privacy policy here: <https://stripe.com/en-gb/privacy#international-data-transfers>. We will not receive your financial details.

Wix.com Ltd is our website host and developer The processing of your personal data may take place within the territory of the European Union, Israel or a third country, which either the EU and UK has decided ensures an adequate level of protection and if no such adequacy decision is in place appropriate safeguards are in place in accordance with Article 46(2) of the UK GDPR . See their privacy policy here: Wix Data Processing Agreement (DPA)

We have offices in France and therefore data will be transferred outside the UK to the EU. The EU and UK have adopted adequacy decisions on such data transfers.

If other transfers out of UK occur: We shall update our privacy policy accordingly.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

All information you provide to us is stored on our secure servers or on secure servers operated by a third party. · We use an electronic compliant system for storing electronic records (Practise Better)

Our laptops and all documents are password protected.

8. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR? We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

We are committed to ensuring that our suppliers have appropriate technical, administrative and physical procedures in place to ensure that your information is protected against loss or misuse.

Records made by us relating to your care, will be stored for up to eight years (in line with British Dietetic Association Guidance for Record and Record Keeping). We may also be under an obligation to store your Personal Data for longer in accordance with our professional indemnity insurers requirements.

In some circumstances you can ask us to delete your data: see *your legal rights* below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please see your Legal Rights in the Glossary below to find out more about these rights:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us .

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. GLOSSARY

LAWFUL BASIS:

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

Necessary to provide you with healthcare. Healthcare information is considered Special Category Data and as our services are the provision of healthcare services, we have a lawful basis to process such data.

THIRD PARTIES

EXTERNAL THIRD PARTIES

- with your consent, information can be shared with relatives, partners or friends who act as a carer for you. We will only share information once the person you have asked us to share the information with has provided us with proof of their identity. We may share information with anyone you have given as an emergency contact, for example your next of kin.
- Service providers acting as processors who provide IT and system administration services such as Wix.com Ltd, our website host and developer whose privacy policy can be viewed here: <https://www.wix.com/about/privacy>, whose servers are located in Europe, Israel and the US.
- We use compliant videotelephony software programs (Practise Better) to carry out dietetic consultations remotely.
- Professional advisers acting as processors including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Our payment processor, currently Stripe, who does not share your financial data with us and who acts as controller of your data in accordance with their privacy policy.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.