

Sue Appelboom

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GDPR DATA PRIVACY NOTICE

As a Registered Nutritional Therapist, I hold some information about 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 making 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, CNHC. In this case the legal basis of me holding your personal data is for contract administration.

Data 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 me may be less effective.

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 online payments.

I 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 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. 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 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:

- 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 I have a duty to do so or if the law allows me 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.

Your rights

You have 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 sue@neatNT.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: If you want to access your data you must make a subject access request in writing to sue@neatNT.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 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 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 email sue@neatNT.com

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 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 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. Sue Appelboom 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).

All records held by me will be kept for the duration specified by guidance from our professional association BANT.

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 sue@neatNT.com.

Website

My website, neatNT.com, uses an electronic form for contact purposes.

Complaints

If you have a complaint regarding the use of your personal data then please contact me by emailing sue@neatNT.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.