

PRIVACY NOTICE - CLIENTS Feel Great Formula LLP

If you have contacted Feel Great Formula LLP we may hold some information about you that you have provided. 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 the Data Controller at hello@feelgreatformula.co.uk We keep our Privacy Notice under regular review. This Privacy Notice was last reviewed in May 2018.

1. What We Do

Feel Great Formula LLP provides nutrition education and training, food demonstrations and wellness coaching to clients so they can make informed healthy food and lifestyle choices and have help to follow through with practical implementation.

2. How We Obtain Your Personal Data

Information provided by you

You might provide us with personal data in the following ways:

- By signing up to automated newsletter and information databases
- By completing questionnaires
- By signing contracts for services
- During educational seminars and coaching appointments
- Through email, over the telephone or by post
- By 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 attendance at seminars and at coaching sessions
- general health information
- Bank details

We use this information in order to provide you with education and coaching services. This means that the legal basis of our holding your personal data is for legitimate interest.

We retain your personal data for the period defined by our professional association BANT and our registered 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.



3. How we use your personal data

We act as a data controller for use of your personal data. We act as a data controller and processor in regard to the processing of credit card and online payments.

We undertake at all times to protect your personal data 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. 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.

4. 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,BANT if we have a duty to do so or if the law allows us to do so

We may share your case history in our marketing materials only in so far as you give us express consent. You may withdraw consent at any time.

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 the Data Controller at hello@feelgreatformaula.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 Feel Great Formula LLP or email hello@feelgreatformula.co.uk

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

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

7. How long do you hold confidential information for?

All records held by Feel Great Formula LLP will be kept for the duration specified by guidance from our professional association BANT and registered body CNHC.

8. Website technical details

a. Forms

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

In compliance with EU legislation, here is the system of classifying the different types of cookies which we use on the Website, or which may be used by third parties through our websites. The classification was developed by the International Chamber of Commerce UK and explains more about which cookies we use, why we use them, and the functionality you will lose if you decide you don't want to have them on your device.



What is a cookie?

Cookies are text files containing small amounts of information which are downloaded to your personal computer, mobile or other device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie. Cookies are useful because they allow a website to recognise a user's device.

How long are cookies stored for?

Persistent cookies - these cookies remain on a user's device for the period of time specified in the cookie. They are activated each time that the user visits the website that created that particular cookie.

Session cookies - these cookies allow website operators to link the actions of a user during a browser session. A browser session starts when a user opens the browser window and finishes when they close the browser window. Session cookies are created temporarily. Once you close the browser, all session cookies are deleted.

Cookies do lots of different jobs, like letting you navigate between pages efficiently, remembering your preferences, and generally improve the user experience.

You can find more information about cookies at www.youronlinechoices.eu.

Cookies used on the Website

Strictly necessary cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.

Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

Functionality cookies. These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

Targeting cookies. These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

Third party cookies

These cookies allow third parties to track the success of their application or customise the application for you. Because of how cookies work we cannot access these cookies, nor can the third parties access the data in cookies used on our site.



For example, if you choose to 'share' content through Twitter or other social networks you might be sent cookies from these websites. We don't control the setting of these cookies, so please check those websites for more information about their cookies and how to manage them.

Cookies are small. We 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 our 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, 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 <u>privacy policy</u> on the Google website.

10. Complaints

If you have a complaint regarding the use of your personal data then please contact us by writing to the Data Controller at 154A Liverpool Road, Birkdale, Southport, UK, PR8 4NS or email hello@Feelgreatformula.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.