



Focus Nutrition⁺

Focus Nutrition + Privacy Notice

Beata Rachowiecka M.A., Dip ION, A.M.E. MBANT MCNHC Dip Phyt CBT

Registered Nutritional Therapist, Phytobiophysics and BodyTalk Practitioner
Senior Associate Member of the Royal Society of Medicine

Privacy Notice

I, Beata Rachowiecka, hold some information about you. I care about your privacy and am committed to protecting it. This document outlines how that information is used, who I may share that information with and how I keep it secure. Whilst this notice does not provide exhaustive detail, I am happy to provide any additional information or explanation if needed. Any requests for this should be sent to beata@focusnutritionplus.co.uk. I keep my Privacy Notice under regular review. This Privacy Notice was last reviewed in May 2018.

1. What I Do

I, Beata Rachowiecka, provide nutritional therapy services to clients to improve their health through diet and lifestyle interventions. I focus on preventative healthcare, the optimisation of physical and cognitive equilibrium and helping you to maintain your health at its best. Through nutritional therapy consultations, dietary and lifestyle analysis and biochemical testing, I aim to understand the underlying causes of your health issues which I then seek to address through personalised dietary therapy, nutraceutical prescription (supplements) and lifestyle advice.

Periodically, I am also involved in writing articles and features for the media, as well as running workshops, educational seminars and entire programmes on different aspects of health and wellbeing.

2. How I Obtain Your Personal Data

Information provided by you

You provide me with personal data in the following ways:

- By completing a Private and Confidential Functional Nutrition Questionnaire
- By signing the Declaration indicating your agreement my Terms of Engagement (mailed to you with the above Questionnaire at the time of initial booking)
- During consultations
- Through email, over the telephone or by post
- By taking an online or card payment

This may include the following information:

- basic personal details such as your name, address, contact details and next of kin
- details of contact I have had with you such as emails, referrals and appointment requests

- health information including your previous medical history, current medical issues, dietary, lifestyle, supplement and medicine details, family history, biochemical test results, clinic notes and health improvement plans
- letters from consultants, your GP and test results done prior and during working with me
- GP contact information
- Your bank details
- Your mobile telephone number

I use this information in order to provide you with direct healthcare. This means that the legal basis of my holding your personal data is for legitimate purposes only. Following completion of your healthcare, I retain your personal data for the period defined by our professional association and regulatory body - BANT. After this period, your data is deleted / shredded as no longer needed. In this case, the legal basis of my holding your personal data is for contract administration purposes.

Information I get from other sources

I may obtain sensitive medical information in the form of your 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 our holding your personal data is for legitimate interest.

I may also 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 may 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 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 with regard to the processing of credit card and 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 my duty of professional confidence and the requirements of the General Data Protection Regulation (GDPR) concerning data protection. I also take reasonable security measures to protect your personal data storage.

Occasionally I may use your personal data where there is an overriding public interest in using this 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 for me to do so. Additionally, I may use your data for marketing purposes such as sending you newsletters via my preferred mailer (currently MailChimp) subject to you giving me your separate, express consent.

Once you have given your consent to receive newsletters you will receive an email from MailChimp for you to confirm your subscription. If you do not confirm your subscription at this point you will not be subscribed to my mailing list. This will not affect any communication directly with me regarding your appointments.

At the time of making your appointment you will be asked for a contact number, preferably mobile, so that you may receive text message confirmations and reminders about your appointment. These reminders are initiated from the 10to8 booking system, and you may choose to refuse to receive these reminders at the time of booking your appointment.

4. Sharing your information with other organisations

I will keep information about you confidential. I will only disclose your information to other third parties with your express consent with the exception of the following categories of third parties:

- My registrant bodies CNHC & BANT, my professional association BANT, and my insurer - only 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 we have with you
- Any legal or crime prevention agencies and/or to satisfy any regulatory request, if I have a duty to do so or if the law allows me to do so.

I may also share your information with supplement companies and biochemical testing providers as part of providing you with direct healthcare. I will not include any sensitive information within this interface.

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.

5. 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 me a reason to see your data.

If you want to access your data, you must make a subject access request in writing to me, beata@focusnutritionplus.co.uk. Under special circumstances, some information may be withheld. I shall respond within a month 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 or have shared 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 me, in a structured, commonly used and machine readable or written/typed format and have the right to transmit that data to another controller, without hindrance from me.
- Object at any time to the processing of personal data concerning you

The only automated processing, which takes place on a legitimate basis, is carried out between the automated booking system I use (10to8.com interface), my Google diary and the Mailchimp. The automation of these systems is managed by Zapier. This is for the purpose of providing you with the forms to be filled in prior to your appointments, sending out appointment reminders and occasional newsletters. This is necessary for me to provide appropriate healthcare to you.

You can withdraw your consent to marketing email at any time by unsubscribing from our list at the bottom of any marketing communication you receive. Any other changes to your consents can be made via the confirmation email you will receive. Please ensure you store the confirmation email for this purpose.

6. Safeguards in place to ensure data that identifies you 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 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, be it on the premises or in our cloud storage base, with access to this information restricted to authorised personnel only. In this case this would be myself and a sub-contractor looking after the interface between the automatic booking system, my Google diary, and the Mailchimp. I ensure they are legally and contractually bound to operate and prove they have security arrangements in place where data that could identify a person is processed.

I also protect your personal and confidential information held on equipment such as my laptop, desktop, the external in-house back up drive and the Google Drive backup with a password and secure encryption (which masks data so that unauthorised users cannot see or make sense of it). This is to provide you with appropriate healthcare and support whenever required.

Every effort is made to ensure your data is secure. In regards to the security of your data processed by the various automations in place, please refer to their privacy policies, which can be found at these links:-

<https://10to8.com/legal/>

<https://policies.google.com/>

<https://mailchimp.com/legal/privacy/>

<https://zapier.com/privacy/>

The security of your data is important, and I have chosen companies that support and implement the measures required to ensure your data is secure, however no system is totally secure. Therefore, if you prefer to have your data processed differently, please let me know.

I, Beata Rachowiecka, am registered with the Information Commissioner's Office (ICO) as a data controller. A copy of the registration is available through the ICO website (search by my name).

7. How long I keep confidential information

All records held by me are kept for the duration specified by guidance from my professional association BANT- currently eight years.

8. Website technical details

- a. At present I do not use electronic forms on my website – the link to the forms is emailed to you to be filled in at the point of initial consultation and the follow-up forms at such times as required.
- b. I may choose to adopt the electronic format in future in order to facilitate an easier completion of the documents in question. In any case, I aim to use secure forms where appropriate.

9. Analytics

Like most websites, I may make use of analytics software in order to help me understand the trends in popularity of my website and of different pages. 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, please contact me by emailing: beata@focusnutritionplus.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 directly on 01625 545745 or 0303 1231113.