

PRIVACY NOTICE

Nutrition with Karolina, 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 the info@karolinanutrition.com We keep our Privacy Notice under regular review. This Privacy Notice was last reviewed in October 2024.

1. What We Do

Nutrition with Karolina 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), lifestyle advice, retreat, talks and workshops.

2. HOW WE OBTAIN YOUR PERSONAL DATA

We may collect data about you by you providing the data directly to us (for example by filling in forms on our site or by sending us emails or messages on whatsapp). We may automatically collect certain data from you as you use our website by using cookies and similar technologies. Please see our Cookie Policy for more details about this.

You provide us with personal data in the following ways

- By completing a health questionnaire
- By signing a terms of engagement form
- By signing a consent form - During a nutritional therapy consultation
- Through email, via the Practice Better database, over the telephone or by post
- By taking credit card and online payments

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.

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.

3. WHAT DATA DO WE COLLECT ABOUT YOU, FOR WHAT PURPOSE AND ON WHAT GROUND WE PROCESS IT

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 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, 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.

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.

Personal data means any information capable of identifying an individual. It does not include anonymised data.

We may process the following categories of personal data about you:

1. Communication Data that includes any communication that you send to us whether that be through the contact form on our website, through email, text, social media messaging, social media posting or any other communication that you send us. We process this data for the purposes of communicating with you, for record keeping and for the establishment, pursuance or defence of legal claims. Our lawful ground for this processing is our legitimate interests which in this case are to reply to communications sent to us, to keep records and to establish, pursue or defend legal claims.
2. Customer Data that includes data relating to any purchases of goods and/or services such as your name, title, billing address, delivery address email address, phone number, contact details, purchase details and your card details. We process this data to supply the goods and/or services you have purchased and to keep records of such transactions. Our lawful ground for this processing is the performance of a contract between you and us and/or taking steps at your request to enter into such a contract.
3. User Data that includes data about how you use our website and any online services together with any data that you post for publication on our website or through other online services. We process this data to operate our website and ensure relevant content is provided to you, to ensure the security of our

website, to maintain back-ups of our website and/or databases and to enable publication and administration of our website, other online services and business. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business.

4. Technical Data that includes data about your use of our website and online services such as your IP address, your login data, details about your browser, length of visit to pages on our website, page views and navigation paths, details about the number of times you use our website, time zone settings and other technology on the devices you use to access our website. The source of this data is from our analytics tracking system. We process this data to analyse your use of our website and other online services, to administer and protect our business and website, to deliver relevant website content and advertisements to you and to understand the effectiveness of our advertising. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business and to grow our business and to decide our marketing strategy.
5. Marketing Data that includes data about your preferences in receiving marketing from us and our third parties and your communication preferences. We process this data to enable you to partake in our promotions such as competitions, prize draws and free give-aways, to deliver relevant website content and advertisements to you and measure or understand the effectiveness of this advertising. Our lawful ground for this processing is our legitimate interests which in this case are to study how customers use our products/services, to develop them, to grow our business and to decide our marketing strategy.
6. We may use Customer Data, User Data, Technical Data and Marketing Data to deliver relevant website content and advertisements to you (including Facebook adverts or other display advertisements) and to measure or understand the effectiveness of the advertising we serve you. Our lawful ground for this processing is legitimate interests which is to grow our business. We may also use such data to send other marketing communications to you. Our lawful ground for this processing is either consent or legitimate interests (namely to grow our business).

3. Sensitive Data

We do not collect any Sensitive Data about you via this website. Sensitive data refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We do not collect any information about criminal convictions and offences.

However, during the course of a nutritional therapy consultation, we will need to collect the following sensitive data about you:

- Information about your health and medical history

We require your explicit consent for processing sensitive data, so when you submit your details, we will send you a further communication asking for you to confirm your consent to this processing.

Where we are required to collect personal data by law, or under the terms of the contract between us and you do not provide us with that data when requested, we may not be able to perform the contract (for example, carry out the nutritional consultation). If you don't provide us with the requested data, we may have to cancel a product or service you have ordered but if we do, we will notify you at the time.

We will only use your personal data for a purpose it was collected for or a reasonably compatible purpose if necessary. For more information on this please email us at info@kaolinanutrition.com. In case we need to use your details for an unrelated new purpose we will let you know and explain the legal grounds for processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

We do not carry out automated decision making or any type of automated profiling.

4. MARKETING COMMUNICATIONS

Our lawful ground of processing your personal data to send you marketing communications is either your consent or our legitimate interests (namely to grow our business).

Under the Privacy and Electronic Communications Regulations, we may send you marketing communications from us if (i) you made a purchase or asked for information from us about our goods or services or (ii) you agreed to receive marketing communications and in each case you have not opted out of receiving such communications since. Under these regulations, if you are a limited company, we may send you marketing emails without your consent. However, you can still opt out of receiving marketing emails from us at any time.

Before we share your personal data with any third party for their own marketing purposes, we will get your express consent.

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you OR by emailing us at info@alexallannutrition.com. If you opt out of receiving marketing communications this opt-out does not apply to personal data provided as a result of other transactions, such as nutritional therapy consultations.

5. DISCLOSURES OF YOUR PERSONAL DATA

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 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.

6. INTERNATIONAL TRANSFERS

Countries outside of the European Economic Area (EEA) do not always offer the same levels of protection to your personal data, so European law has prohibited transfers of personal data outside of the EEA unless the transfer meets certain criteria.

Some of our third parties service providers are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Examples of this would include Practice Better, Mailchimp and Dropbox cloud storage.

Whenever we transfer your personal data out of the EEA, we do our best to ensure a similar degree of security of data by ensuring at least one of the following safeguards is in place:

- We will only transfer your personal data to countries that the European Commission have approved as providing an adequate level of protection for personal data by; or
- Where we use certain service providers, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe; or
- If we use US-based providers that are part of EU-US Privacy Shield, we may transfer data to them, as they have equivalent safeguards in place.

If none of the above safeguards is available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

7. 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 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, 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.

8. 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 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.

9. 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 request in writing to info@karolinanutrition.com 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 email info@karolinanutrition.com

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

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.

Karolina Nutrition 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).

11. How long do you hold confidential information for?

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

12. 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, the following table lists the use of cookies on this web site:

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>

13. 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.

14. Complaints

If you have a complaint regarding the use of your personal data then please contact us by writing to the Data Controller at Horse Shoe Cottage, Warmbrook, Wirksworth, DE44EA or email info@karolinanutrition.com

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.