

## **GDPR Privacy Statement – Porter Nutrition**

Data Controller: Aliya Porter trading as Porter Nutrition

Data Protection Lead: Aliya Porter

Date of Policy: 8/5/18

This is the privacy statement and data protection policy for Aliya Porter trading as Porter Nutrition. It covers how we will process (use and store) your data, what data we hold, your individual rights and how you can interact with us about your data. As with all policy statements, it is a bit wordy! But don't let this put you off, and if you need to you are welcome to get in touch with our Data Protection Lead. We are here to help!

This policy covers our use of Personal data, which is any information about a living individual which allows them to be identified from that data (for example a name, photographs, videos, email address, or address). This maybe you! Identification can be by the information alone or in conjunction with any other information. Our processing of personal data is governed by the Data Protection Bill/Act 2017-2019 and the General Data Protection Regulation 2016/679 (the "GDPR" and other legislation relating to personal data and rights such as the Human Rights Act 1998]. Who are we? This Privacy Notice is provided to you by Aliya Porter trading as Porter Nutrition which is the Data Controller for your data. Aliya Porter is responsible for the control and processing of personal data that we hold. She has been trained in GDPR requirements.

### **So, how is your data used and processed?**

Aliya Porter trading as Porter Nutrition processes data containing:

- names, titles, and aliases, photographs;
- Contact information including telephone numbers, postal /residential addresses, and email addresses;
- Where there is a legitimate interest to facilitate business aims and activities, or where you have provided them to us, we may process demographic information such as gender, age, date of birth, marital status, nationality, education/work histories, academic/professional qualifications, hobbies, family composition, and dependants;
- Where you have paid by BACS, financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers;
- As a healthcare organisation, the data we process is likely to constitute sensitive personal data such as medical information and religious beliefs.

Any personal data sent by Porter Nutrition will be sent via email in a password protected format.

### **What is our legal basis for processing your personal data?**

- Most of our data is processed because it is necessary for our legitimate interests to enable our business aims. For example, maintaining records of client consultations and events, safeguarding children, recording our financial payments and providing evaluation to funding bodies.
- Some of our processing is necessary for compliance with a legal obligation. Retaining safeguarding records is an example of this.
- We may also process data if it is necessary for the performance of a contract with you, or to provide a direct service to you. For example, if you attend one to one consultations, or courses and events.
- Where your information is used other than in accordance with one of these legal bases, we will first obtain your consent to that use.

### **Will we share your data?**

You can be reassured that we will treat your personal data as strictly confidential. It will only be shared with third parties where it is necessary for the performance of our tasks or where you first give us your prior consent, for example consent to inform your GP about the service you are receiving.

### **How long will we keep your personal data?**

Our general rule is to keep data no longer than necessary. Where you continue to actively engage with our services, activities and events, we will retain the appropriate data for you so that we can best serve your involvement. We operate to an annual process of review. Additionally;

- We will keep some records permanently if we are legally required to do so.
- We may keep some other records for an extended period of time. For example, it is current best practice to keep financial records for a minimum period of 7 years to support HMRC audits.
- We will store some records permanently for insurance or professional conduct purposes.

### **What are your rights in regards to your personal data?**

You have the following rights with respect to your personal data: When exercising any of the rights listed below, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.

- The right to access information we hold on you. At any point you can contact us to request the information we hold on you as well as why we have that information, who has access to the information and where we obtained the information from. Once we have received your request we will respond within one month. There are no fees or charges for the first request but additional requests for the same data may be subject to an administrative fee .
- The right to correct and update the information we hold on you. If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated. Where

information held on you is the professional opinion of Aliya Porter related to you, records will not be amended, rather it will be noted on your records that you have disputed this.

- The right to have your information erased. If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase the data we hold. When we receive your request we will confirm whether the data has been deleted or the reason why it cannot be deleted (for example because we need it for our legitimate interests or regulatory purpose(s)).
- The right to object to processing of your data. You have the right to request that we stop processing your data. Upon receiving the request we will contact you and let you know if we are able to comply or if we have legitimate grounds to continue to process your data. Even after you exercise your right to object, we may continue to hold your data to comply with your other rights or to bring or defend legal claims.
- The right to data portability. You have the right to request that we transfer some of your data to another controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.
- The right to withdraw your consent to the processing at any time for any processing of data to which consent was sought. You can withdraw your consent easily by telephone, email, or by post (see Contact Details below).
- The right to lodge a complaint with the Information Commissioner's Office. You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF.

### **Transfer of Data Abroad**

Any electronic personal data transferred to countries or territories outside the EU will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the European Union. Our website is also accessible from overseas so on occasion some personal data (for example quotes given on evaluation forms) may be accessed from overseas, however it is our general practice only to publish comments where permission has been given to do so.

### **Further processing**

If we wish to use your personal data for a new purpose, not covered by this Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

### **How will Porter Nutrition safeguard your data**

- We will ensure that only encrypted, password protected devices (computers, laptops, phones and USB sticks) are used to store personal electronic data.
- Data shall only be sent to a printer on a password protected network

- Only cloud services which comply with GDPR will be used.
- Only where explicit consent is given will client names and comments be used on social media, no other data will be put on social media.
- Notifications on mobile phones will not show the sender or details of the message when the phone is in locked mode
- All non-electronic personal data will be stored in a locked storage cabinet and only Aliya Porter shall have access to the code for this storage cabinet.
- A clear desk policy is in operation
- Where it is necessary to remove personal data from the locked cabinet, it shall be kept on the person of Aliya Porter at all times.

### **Data breaches**

If data is lost or it is suspected that someone has access to the data without permission, the Data Controller will inform the Information Commissioner and affected individuals in line with GDPR.

You are very welcome to get in contact with us... If you have any queries or concerns about how we use your data, please do get in contact with us. Our Data Protection lead is Aliya Porter] and can be contacted at: Email: [porternutritionuk@gmail.com](mailto:porternutritionuk@gmail.com) Tel: 07986 809633

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