



## PRIVACY NOTICE AND DATA PROTECTION POLICY STATEMENT

### **PRIVACY NOTICE**

This Privacy Notice is provided to you by Fons Vitae Nutrition (FVN) which is the data controller for your personal data.

#### **Your personal data – what is it?**

“Personal data” 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). Identification can be directly using the data itself or by combining it with other information which helps to identify a living individual. The processing of personal data is governed by legislation relating to personal data which applies in the United Kingdom including the General Data Protection Regulation (the “GDPR”) and other legislation relating to personal data and rights such as the Human Rights Act.

FVN collects and uses information about people with whom it communicates eg FVN clients.

This personal information must be dealt with properly and securely however it is collected, recorded and used – whether on paper, in a computer, or recorded on other material – and there are safeguards to ensure this in the GDPR.

FVN regards the lawful and correct treatment of personal information as very important to the successful and efficient performance of its functions, and to maintain the confidence of those with whom it deals.

To this end FVN fully endorses and adheres to the Principles of Data Protection, as set out in the GDPR.

#### **Purpose**

The purpose of this policy is to ensure that the clients of FVN are clear about the purpose and principles of Data Protection and to ensure that FVN has guidelines and procedures in place which are consistently followed.

Failure to adhere to GDPR is unlawful and could result in legal action being taken against FVN or employees handling data.

#### **Principles**

GDPR regulates the processing of information relating to living and identifiable individuals (data subjects). This includes the obtaining, holding, using or disclosing of such information, and covers computerised records as well as manual filing systems and card indexes.

Data users must comply with the data protection principles of good practice which underpin GDPR. To comply with the law, information must be collected and used fairly, stored safely and not disclosed to any other person unlawfully.

#### **Your rights and 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 personal data we hold on you**

At any point you can contact us to request the personal data we hold on you as well as why we have that personal data, who has access to the personal data and where we obtained the personal data 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 personal data or requests which are manifestly unfounded or excessive may be subject to an administrative fee.

### **The right to correct and update the personal data 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.

### **The right to have your personal data erased**

If you feel that we should no longer be using your personal data or that we are unlawfully using your personal data, you can request that we erase the personal data we hold.

When we receive your request we will confirm whether the personal data has been deleted or the reason why it cannot be deleted (for example because we need it to comply with a legal obligation).

### **The right to object to the processing of your personal data or to restrict it to certain purposes only**

You have the right to request that we stop processing your personal data or ask us to restrict processing. Upon receiving the request we will contact you and let you know if we are able to comply or if we have a legal obligation to continue to process your data.

### **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**

You have the right to withdraw your consent at any time for any processing of data to which consent was obtained. You can withdraw your consent easily by telephone, email, or by post (see Contact Details below).

### **Other data controllers FVN works with:**

- Contractors (consultants who we may use from time to time to assist in the achieving of specific work of FVN eg building a new website).

If we and the other data controllers listed above are processing your data jointly for the same purposes, then FVN and the other data controllers may be “joint data controllers” which mean we are all collectively responsible to you for your data. Where each of the parties listed above are processing your data for their own independent purposes then each of us will be independently responsible to you and if you have any questions, wish to exercise any of your rights (see below) or wish to raise a complaint, you should do so directly to the relevant data controller.

### **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 personal data transferred to countries or territories outside the European Economic Area ("EEA") 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 on the Meet the Members page of the website) may be accessed from overseas].

#### **Further processing**

If we wish to use your personal data for a new purpose, not covered by this Privacy 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.

#### **Changes to this notice**

We keep this Privacy Notice under regular review and we will place any updates on our members are on the FVN website: <http://www.fonsvitaenutrition.co.uk/> as well as secure hard copies in all our clinics. This Notice was last updated in May 2018.

#### **Contact Details**

Please contact us if you have any questions about this Privacy Notice or the personal data we hold about you or to exercise all relevant rights, queries or complaints at:

The Data Controller  
FVN

[info@fonsvitaenutrition.co.uk](mailto:info@fonsvitaenutrition.co.uk)



## **POLICY STATEMENT**

FVN as a body is a DATA CONTROLLER under the Act, and also a DATA PROCESSOR, and the Committee is ultimately responsible for this policy's implementation.

The following procedures have been developed in order to ensure that FVN meets its responsibilities in terms of Data Protection.

### **Data Records Purposes**

FVN obtains personal data (such as names, addresses, phone numbers and email and website addresses) from clients and others. This data is obtained, stored and processed solely to assist personnel in the efficient running of FVN and its activities. Personal details supplied are only used to send material that is potentially useful and to collect dietary and medical information to guide and inform advice and consultations provided for the benefit of FVN clients. Most of this information is stored securely in paper form or on the Data Controller's personal laptop in the form of the FVN database and other related documents.

FVN will process some or all of the following personal data where necessary to perform its tasks:

- Contact details such as names, telephone numbers, addresses, email/website addresses and membership subscription dates

FVN will process this data for some or all of the following purposes:

- Where the data is relevant to FVN fulfilling the aims for which it was set up
- Information submitted by you in response to surveys, questionnaires or similar that FVN may prepare and circulate from time to time
- To send you emails with information about FVN activities (eg FVN meetings), events, reports, updates and projects arranged by FVN and other relevant parties, including promotional information and recipes among other nutrition information.
- Networking purposes amongst FVN members
- When undertaking a mailing to persons whose personal details are held by FVN, emails will be sent using the 'blind copy' facility

### **Consent**

Written consent is not requested on the basis that FVN has a legitimate interest as it is assumed that the consent has been granted when an individual freely gives their own details.

Personal data will not be passed on to anyone outside the FVN without explicit consent from the data owner unless there is a legal duty of disclosure under other legislation, in which case the Administrative Co-ordinator will discuss and agree disclosure with the Chair.

### **Access**

Only the FVN employees and FVN volunteers involved in the running of FVN will normally have access to personal data.



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are made aware Protection Policy not to disclose anyone who is

Information supplied is kept in a secure filing, paper and electronic system and is only accessed by those individuals involved in the running of the FVN.

Information will not be passed on to anyone outside FVN without their explicit consent, excluding statutory bodies eg HM Revenue and Customs.

Individuals will be supplied with a copy of any of their personal data held by the FVN if a request is made.

### **Accuracy**

FVN will take reasonable steps to keep personal data up to date and accurate.

Personal data will be stored for as long as the individual continues to be a member and normally longer. Where an individual ceases to be a member and it is not deemed appropriate to keep their records, their records will be destroyed. However, unless we are specifically asked by an individual to destroy their details, we will normally keep them on file for future reference.

If a request is received from a member to destroy their records, we will remove their details from the database and request that all personnel holding paper or electronic details for the member destroy them. This work will be carried out by the Data Controller or Chair of FVN who act as Information Officers.

### **Storage**

Personal data may be kept in paper-based systems and on a password-protected computer system. Paper-based data are stored in organised and secure systems.

### **Use of Photographs**

Where practicable, FVN will seek consent of members/individuals before displaying photographs in which they appear. If this is not possible (for example, a large group photo), FVN will remove any photograph if a complaint is received. This policy also applies to photographs published on FVN's website updates, circular emails and similar.

### **Responsibilities of volunteers**

During the course of their duties with the FVN, volunteer members will be dealing with information such as names/addresses/phone numbers/e-mail addresses of members. They may be told or overhear sensitive information while working for FVN. The GDPR gives specific guidance on how this information should be dealt with. In short to comply with the law, personal information must be collected and used fairly, stored safely and not disclosed to any other person unlawfully. Personnel, paid or unpaid, must abide by this policy.