

PRIVACY

This privacy policy sets out how IYAM Living uses and protects any information that you give IYAM Living when you use this website.

IYAM Living is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this privacy statement.

IYAM Living may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. This policy is effective from 01/05/2020.

HOW WE OBTAIN YOUR PERSONAL DATA

Information provided by you

You provide us with personal data in the following ways:

- By completing a nutritional therapy questionnaire
- By signing a terms of engagement form
- During a nutritional therapy consultation
- Through email, 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 and clinic notes

- 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, ANP. 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.

Information we get from other sources

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.

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 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 and 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 to do so.

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 professional association, ANP, for the processing of a complaint made by you
- Any contractors and advisors who 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 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.

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 iyamliving@gmail.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 structured, commonly used and machine readable format and you 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, iyamliving@gmail.com

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 who 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 is processed.

HOW LONG DO YOU HOLD CONFIDENTIAL INFORMATION FOR?

All records held by IYAM Living will be kept for the duration specified by guidance from our professional association ANP.

WEBSITE TECHNICAL DETAILS

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:

HOW WE USE COOKIES

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web

traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

By using this website you agree in the use of cookies on this site.

LINKS TO OTHER WEBSITES

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

COMPLAINTS

If you have a complaint regarding the use of your personal data then please contact us by writing to the Data Controller by email at iyamliving@gmail.com and we will do our best to help you.