

Privacy Policy

This privacy notice sets out how I collect, process and protect any information that you provide. This is in accordance with the General Data Protection Regulation (GDPR) which came into force in May 2018.

I am committed to ensuring that your privacy is protected. Should you provide certain information by which you can be identified, then you can be assured that it will only be used in accordance with this privacy statement. I may amend this policy by updating this page, and you should check this page from time to time to ensure that you are happy with any changes.

This policy was last updated on 5th August 2018.

This notice does not provide exhaustive detail. If you require any additional information or explanation, please send a request by email to advice@shem.im

I, Ms Shem H Allanson am the data controller and am responsible for your personal data.

What I Do

I provide dietetic and nutritional therapies to clients who want to improve their health. I operate as a "health professional" and focus on preventative health care as well as the optimisation and management of chronic health conditions. Through my interaction with you, I aim to understand the underlying causes of your health issues and seek to address these through personalised nutrition / dietetic programmes, nutraceutical recommendations (supplements) and lifestyle advice. I provide these services within the scope of my practice and qualifications. The vast majority of the treatments I use are evidence-based treatments. Occasionally, where no evidence-based treatment is available I may make alternative suggestions but I will inform you at the time, that such treatment is not currently evidence-based. You follow non-evidence-based treatments at your own risk. I do not prescribe medications and do not sell supplements for a profit.

The Data I Collect

PERSONAL DATA PROVIDED BY YOU

Personal data means any information that can directly or indirectly identify an individual. It does not include anonymised data.

I may collect the following personal data from you:

- Identity data such as your full name, maiden name, marital status, title, date of birth and gender.
- Contact details such as your address, email address, telephone numbers, and contact details of your next of kin.
- Details of contact I have had with you such as referrals and appointments.

- Your GP's name, address and contact information.
- Financial data such as bank account and payment card details.
- Transaction data such as details about payments between us.
- Feedback regarding my services.

I collect and process this data in accordance with the "legitimate interest" condition. **This means that the lawful basis of my holding your personal data is for legitimate interest.**

SPECIAL CATEGORY DATA/SENSITIVE DATA

Special category data is personal data which according to the GDPR is considered more sensitive and therefore needs more protection.

Such data includes details about your race or ethnic origin, religious views and beliefs, sex life or sexual orientation, information about your health and genetics and biometric data.

I collect the following sensitive data about you:

- Health information provided by you, including your previous and present medical history including your physical and mental health, and details of diagnosed conditions.
- Dietary and lifestyle habits and supplementation details.
- Details on your past and present medication.
- Copies of NHS or private medical test results such as blood tests, x rays etc. provided by you.
- Third party/functional biochemical test results and genetic information.
- Clinic notes and health improvement programmes.

I use this information in order to provide you with direct healthcare. Even though, I may seek your explicit consent for processing, my primary condition for processing is "preventative health care and health management", and **the lawful basis of my holding your personal data is for legitimate interest.**

On occasions, I may also obtain sensitive data from other health care providers or individuals authorised by you to give out such information. **The provision of this information is subject to you giving me your express consent.** If I do not receive this consent from you, I will not be able to coordinate your healthcare with these providers.

I also understand that collecting, processing and holding your special category data requires me to comply with the "common law of confidentiality", independently of the GDPR regulations.

How I Collect Your Personal Data

I may collect your personal data in the following ways:

- By completing a health, medical and lifestyle questionnaire.

- By signing a terms of engagement form if applicable.
- During a personal one-on-one consultation.
- Through email, Skype, telephone, post, online chat or social media.
- By taking debit/credit card and online payment.
- Through automated technologies such as cookies.

My purpose in collecting your data through the above ways is to provide you with direct health care, and **the legal basis of my holding your personal data is for legitimate interest.**

How Long will I Hold Your Data

Following completion of your therapy, ***I will hold records of your personal data for at least 7 years following the last occasion on which treatment was given. In the case of treatment to minors, I will keep the records at least 12 years.***

This is in accordance with my professional association's policy and my insurance company's policy, and it enables me to process any complaint you may make. **In this case the lawful basis of my holding your personal data is for legitimate interests.**

You have the right to object and the right to request your data to be erased. However, such requests may be declined under provisions of the GDPR which gives me the overriding right to hold your data in order to comply with legal obligations.

How I Use Your Personal Data

I act as a data controller for use of your personal data to provide direct health care. I also act as a controller and processor in regard to the processing of your data from third parties such as functional testing companies, supplement companies and other healthcare providers. I act as a data controller and processor in regard to the processing of debit/credit card and online payments.

I undertake at all times to protect your personal data, including any health, medical, identity and contact details, in a manner that is consistent with my duty of professional confidence and the requirements of the General Data Protection Regulation (GDPR) concerning data protection. I will also take reasonable security measures to protect your personal data storage.

I 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. **I will do this in accordance of the "vital interest" condition.** I will also be obliged to share your data when there is a legal requirement such as a formal court order. **This will be on the basis of "legal obligation".** I may use your data for marketing purposes such as newsletters but this would be subject to you giving us your express consent.

Disclosure Of Your Personal Data

I will keep information about you strictly confidential, and will not disclose your data to other third parties without your express consent.

Exceptions to the above may apply for the following categories of third parties:

- My professional association and insurance company for the processing of a complaint made by you.
- Biochemical/Functional testing companies and supplement companies as part of providing you with direct health care.
- Your GP, healthcare providers, police, social services in a case when we believe your life is in danger on the lawful basis of vital interest.
- Anyone to whom I may transfer my rights and duties under any agreement I 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.

On occasions, I may share a brief summary of your health problems in an anonymised form for the purpose to seek professional health opinion in order to provide you with better health care, or for the purpose of professional development. This may be at clinical supervision meetings, conferences, private and professional health online forums. In such cases your personal data and identity will not be disclosed and will remain fully confidential.

I may publish your anonymised full case history in medical journals, trade magazines or online professional sites. **I will seek your explicit consent before processing your data in this way.**

Your Legal Rights

Every individual has the right to see, amend, delete or have a copy of data held that can identify them, with some exceptions. You do not need to give a reason to see your data.

The GDPR defines the following rights in relation to your personal data:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling (*not relevant to us*)

If you would like to invoke any of the above rights then please email myself, the Data Controller at advice@shem.im. I will respond within 30 days from the point of receiving the request and all necessary information from you.

Under certain circumstances, some information may be withheld.

Data Protection And Security

I only use information that may identify you in accordance with the GDPR. This requires me to process personal data only if there is a lawful basis for doing so and that any processing must be fair and lawful.

As a "health professional" within the health sector, I am also obliged to follow the "*common law of confidentiality*", 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 ensure that your information is protected and is only used in a way which complies with the law and my privacy policy.

I have put in place appropriate security measures to prevent your personal data from being accessed, changed or used in an unauthorised way. I keep a paper copy of your personal data, including sensitive data in a secure filing system accessible only by myself. I also keep a copy of such data electronically on a computer with encryption (which masks data so that unauthorised users cannot see or make sense of it). I use email providers who use encryption to secure cyber transit of your personal data and I take responsibility for the protection of your data upon receipt. However, I do not take responsibility for the security measures you are taking at your end when you provide your data to me electronically.

I ensure external data processors that support me are legally and contractually bound to operate and that they can prove security arrangements are in place where data that could or does identify a person is processed.

Cookies

Cookies are small pieces of data stored in encrypted text files and located in browser directories. Their purpose is to make the website easier to use, help analyse web traffic or remember your preferences either for a single visit (*through session cookies*) or for repeated visits (*through persistent cookies*).

If you are not happy with this, you can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

To find out more about how to manage and delete cookies, visit aboutcookies.org. For more details about advertising cookies, and how to manage them, visit youronlinechoices.eu (EU based), or aboutads.info (US based).

Analytics

Just like many websites, I use an analytics software called Google Analytics in order to understand the trends in popularity of my website and of different sections. I make no use of personally identifiable information in any of the statistical reports I use from this software. Google Analytics's own privacy policy can be read [here](#):

Forms

In future I will be using electronic forms on my website making use of an available 'forms module' which has a number of built-in features to help ensure privacy. I will use secure forms where appropriate.

Complaints

If you have a complaint regarding the use of your personal data then please email me at shem.im and I will do my best to help you.

If any complaint is not resolved to your satisfaction and you wish to make a formal complaint, you can do so to the Information Commissioner's Office (ICO). You can contact them on 01625 545745 or 0303 1231113.