

Privacy Policy

Wellswood Health is aware of its obligations under the UK Data Protection Act 2018 and the GDPR and is committed to processing data securely and transparently. Wellswood Health is registered with the Information Commissioner's Office (ICO) as a Data Controller. A copy of the registration is available through the ICO website.

This privacy notice sets out, in line with GDPR, the types of data that we hold. It also sets out how we use that information, how long we keep it for and other relevant information about your data.

This privacy notice should be read in conjunction with the [Data Protection Policy](#) which outlines our general approach to the collection, processing and ongoing monitoring of personal data.

What we do

Wellswood Health provides nutritional therapy services to clients to improve their health through diet and lifestyle interventions. Focus is on preventative healthcare, the optimisation of physical and mental health and chronic health conditions. Through consultations, dietary and lifestyle analysis and functional testing, we aim to understand the underlying causes of health issues; seeking to address these through personalised nutrition, nutraceutical prescription (supplements) and lifestyle recommendations.

Data controller details

Wellswood Health is a data controller, meaning that it determines the processes to be used when using your personal data to provide direct healthcare.

Wellswood Health also acts as a data controller and processor in regard to processing your personal data from third parties, such as testing companies and other healthcare providers.

Our Data Privacy Lead who takes responsibility within Wellswood Health for our activities as a Data Controller is Esther Baylis.

Data protection principles

In relation to your personal data, we will:

- process it fairly, lawfully and in a clear, transparent way
- collect your data only for reasons that we find proper for the course of your engagement with Wellswood Health in ways that have been explained to you
- only use it in the way that we have told you about
- ensure it is correct and up to date
- keep your data for only as long as we need it
- process it in a way that ensures it will not be used for anything that you are not aware of or have consented to (as appropriate), lost or destroyed

Personal Data Collected

Wellswood Health collects and processes a range of information about you. This may include any or all of the following:

- your name, address, contact details, including email address and telephone number, date of birth, and gender;
- 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, functional test results, clinic notes and nutrition and wellbeing plans;
- information about your marital status, dependents; and
- GP contact information
- MYCaW® (Measure Yourself Concerns & Wellbeing) Questionnaire is an individualised validated questionnaire designed for evaluating holistic and personalised healthcare approaches

How we collect your data

Wellswood Health collects personal data in a variety of ways.

A lot of personal data is collected directly from you, for example:

- By completing a health & nutrition intake questionnaire
- By signing a terms of engagement form
- During a nutritional therapy consultation
- GP correspondence & test results
- Functional testing assessments
- Through email, over the telephone or by post
- Use of website – www.wellswoodhealth.co.uk

In some cases, Wellswood Health may collect personal data about you from third parties, such as reports supplied by testing companies or your GP.

Our Website & Cookies

Our website is hosted by Squarespace. Squarespace collects personal data when you visit our website, including:

- Information about your browser, network and device
- Web pages you visited prior to coming to this website
- Web pages you view while on this website
- Your IP address

Squarespace needs the data to run our website, and to protect and improve its platform and services. Squarespace analyses the data in a de-personalized form.

Our website uses cookies and similar technologies, which are small files or pieces of text that download to a device when a visitor accesses a website or app. For information about viewing the cookies dropped on your device, visit [The cookies Squarespace uses](#).

These functional and required cookies are always used, which allow Squarespace, our hosting platform, to securely serve our website to you.

These analytics and performance cookies are used on this website, as described below, only when you acknowledge our cookie banner. This website uses analytics and performance cookies to view site traffic, activity, and other data.

When you submit information to this website via webform, we collect the data requested in the webform in order to track and respond to your submissions. We share this information with Squarespace so that they can provide website services to us. We also share this information with MailChimp our email marketing provider for storage and marketing communications. You may unsubscribe from marketing emails at any time by clicking the link at the bottom of the email.

Our website serves font files from and renders fonts using Google Fonts and Adobe Fonts. To properly display this site to you, these third parties may receive personal information about you, including:

- Information about your browser, network, or device
- Information about this site and the page you're viewing on it
- Your IP address

The Legal Basis for Personal Data Processing

Wellswood Health needs to process different types of personal data for a variety of reasons:

To meet contractual obligations

Wellswood Health needs to process data to meet its obligations in relation to your Terms of Engagement Agreement. For example, to provide services in accordance with your Terms of Engagement Agreement.

To meet legal obligations

Wellswood Health needs to process personal data to comply with legal obligations. For example, processing and retention of client invoices to meet HMRC legal requirements.

To pursue a legitimate interest

In other cases, Wellswood Health may process personal data based on a legitimate interest. This may be your legitimate interest, or Wellswood Health, or a third party's. An example would be processing your personal data in the form of tests from functional testing companies in order to provide you with direct healthcare.

All of the processing carried out by us falls into one of the permitted reasons.

How We Use Your Personal Data

The following is a non-exhaustive list of how Wellswood Health may use your personal data, before, during and after the end of your engagement with Wellswood Health;

- Providing direct healthcare;
- Processing data from third parties such as functional testing companies and other healthcare providers;
- maintaining accurate and up-to-date clinic records;
- maintaining accurate and up-to-date contact details; and
- providing GP letters on request.

We do not carry out any automated processing, which may lead to automated decisions based on your personal data.

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, to prevent a serious crime or 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.

Special category data

Some types of personal data is classified as “special category” data and is subject to additional safeguards.

Wellswood Health processes the following special category data:

- racial or ethnic origin
- religious or philosophical beliefs
- health information
- biometric data
- sex life or sexual orientation

We may obtain sensitive information from other healthcare providers. The provision of this information is subject to your express consent. Without express consent, we will be unable to provide a coordinated healthcare approach.

Sharing your data

Your data will be shared with third parties in order to:

1. Store health records securely and in accordance with GDPR data protection legislation. Wellswood Health uses Practice Better, an electronic practice management tool to store health records, appointment information and communication between Wellswood Health and clients. Practice Better stores data in Canadian and US data centres. Both Canada and the US are acknowledged as countries which provide adequate levels of data protection outside of the EU to comply with UK GDPR. For more information on the privacy practices of Practice Better, please visit the Practice Better Privacy web page:

<https://practicebetter.io/privacy/>. Clients will be asked to provide express consent prior to accessing Practice Better.

2. Process supplement recommendations as part of providing you with direct healthcare. We will not include any sensitive information.
3. Process functional testing as part of providing you with direct healthcare. We will not include any sensitive information.
4. Conduct food diary analysis.

We will seek your express consent in order to:

1. Store your personal data on Practice Better
2. Share your personal data with your GP or other healthcare providers. In circumstances where we believe that your life is in danger we may disclose information to the appropriate authority using the legal basis of vital interests. This includes the police, social services in the case of a child or vulnerable adult or a GP in the case of self-harm.
3. Share your case history in an anonymised form as part of continued professional development & clinical supervision

Protecting your data

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse.

Please refer to Wellswood Health's Data Protection Policy and Confidentiality section of your Terms of Engagement for further details.

Within the health sector we have a duty to follow the Common Law Duty of Confidence which sets out the key principle that information confided should not be used or disclosed further, except as originally understood by you, or without express consent.

How long we keep your data for

In line with data protection principles, we only keep your data for as long as we need it for, as required by UK Tax Law and the requirements of the professional body, BANT. See Appendix 1 for details.

Invoices are retained for 6 years from the end of the financial year in which it was issued, in line with HMRC tax relevant periods. Data outside of this timeframe will be deleted.

All other data will be kept for 8 years from the date of the last consultation, in line with Professional Association, BANT, requirements. In the case of a child, records will be kept until their 25th birthday, unless the client was 17 at the conclusion of sessions, where records will be kept until their 26th birthday.

Your rights in relation to your data

The law on data protection gives you certain rights in relation to the data we hold on you. These are:

- the right to be informed. This means that we must tell you how we use your data, and this is the purpose of this privacy notice
- the right of access. You have the right to access the data that we hold on you. To do so, you should make a subject access request. You can read more about this in our [Data Protection Policy](#)
- the right for any inaccuracies to be corrected. If any data that we hold about you is incomplete or inaccurate, you are able to require us to correct it
- the right to have information deleted. If you would like us to stop processing your data, you have the right to ask us to delete it from our systems where you believe there is no reason for us to continue processing it
- the right to restrict the processing of the data. For example, if you believe the data we hold is incorrect, we will stop processing the data (whilst still holding it) until we have ensured that the data is correct
- the right to portability. You may transfer the data that we hold on you for your own purposes
- the right to object to the inclusion of any information. You have the right to object to the way we use your data where we are using it for our legitimate interests
- the right to regulate any automated decision-making and profiling of personal data. You have a right not to be subject to automated decision making in way that adversely affects your legal rights.

If you would like to exercise any of these rights, please contact Esther Baylis, esther@wellswoodhealth.co.uk.

Withdrawal of consent

Where you have provided consent to our use of your data, you also have the unrestricted right to withdraw that consent at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. There will be no consequences for withdrawing your consent. However, in some cases, we may continue to use the data where so permitted by having a legitimate reason for doing so.

If you wish to exercise any of the rights explained above, please contact Esther Baylis, esther@wellswoodhealth.co.uk.

Making a complaint

If you wish to raise a complaint on how we have handled your personal data, you can contact Esther Baylis who will investigate the matter.

The supervisory authority in the UK for data protection matters is the Information Commissioner (ICO). If you are not satisfied with our response or believe that Wellswood Health has not complied with your data protection rights you are able to make a complaint to the ICO (www.ico.org).

Data Protection Officer

Wellswood Health's Data Protection Officer is Esther Baylis. They can be contacted at esther@wellswoodhealth.co.uk.