

## Privacy Policy

### 1. Scope

All data subjects whose personal data is collected, in line with the requirements of the GDPR.

### 2. Responsibilities

2.1 The Data Protection Officer is responsible for ensuring that this notice is made available to data subjects prior to collecting/processing their personal data.

2.2 All Employees/Staff of Glenville Nutrition who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and that, where required, their consent to the processing of their data is secured.

### 3. Privacy Notice

#### 3.1 Who are we?

*Glenville Nutrition Ireland is a Nutritional Therapy practice operating under franchise, owned and operated by Positive Nutrition Limited.*

Our Data Protection Officer can be contacted directly here:  
Email: heather@glenvillenutrition.ie; Tel: 01 4020777

The personal data we would like to collect from and/or process on you is:

Personal Data Type: email address, name, county  
Source: website registration, events (incl. online)

Personal Data Type: email address, name, county  
Source: Infusionsoft (email marketing provider)

Personal Data Type: name, address, date of birth, email address, phone number, other health data as necessary  
Source: clinician/patient

The personal data we collect will be used for the following purposes:

- Website metrics
- Cookies
- Email marketing
- Fulfilment of Nutritional Therapy services

Our legal basis for processing for the personal data will be one or more of the following:

- Legitimate interest
- Contractual obligation
- Consent where required

Any legitimate interests pursued by us, or third parties we use, are as follows:

- Email marketing
- Fulfilment of nutritional therapy services

The special categories of personal data concerned are one or more of the following:

- Health data
- Genetic data
- Biometric Data

### 3.2 Consent

By consenting to this privacy notice, you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for Glenville Nutrition to process (sensitive) special category data such as health data, genetic data or biometric data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

### 3.3 Disclosure

Glenville Nutrition Ireland will not pass on your personal data to third parties without first obtaining your consent. The following third parties will receive your personal data for the following purpose(s) as part of the processing activities:

## **ORGANISATION / SAFEGUARDS IN PLACE TO PROTECT YOUR PERSONAL DATA**

Invivo Clinical / GDPR

Biolab / GDPR

Infusionsoft / GDPR

Pioneer Software / GDPR

Genova Diagnostics / GDPR

The Natural Dispensary / GDPR

### 3.4 Retention period

Glenville Nutrition Ireland will only retain your data for as long as is required in order to provide the service, or as required by law.

### 3.5 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you - the data subject - have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to erasure – in certain circumstances you can ask for the data we hold about you to be erased from our records. You have the right to have your personal data erased if:
  - the personal data is no longer necessary for the purpose which we originally collected or processed it for;
  - we are relying on consent as our lawful basis for holding the data, and you withdraw your consent;

- we are relying on legitimate interests as our basis for processing, you object to the processing of your data, and there is no overriding legitimate interest to continue this processing;
- we are processing the personal data for direct marketing purposes and you object to that processing;
- we have processed the personal data unlawfully (i.e. in breach of the lawfulness requirement of the 1st principle of the GDPR);
- we have to do it to comply with a legal obligation; or
- we have processed the personal data to offer information society services to a child;
- we have no legal obligation to retain the personal data
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Glenville Nutrition Ireland refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.3 above) in the processing of your personal data.

### 3.6 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Glenville Nutrition Ireland (or third parties as described in 3.3 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Glenville Nutrition's Data Protection Officer, Heather Leeson. The details for each of these contacts are:

#### **Supervisory Authority**

Data Protection Commissioner

<https://www.dataprotection.ie/docs/Home/4.htm>

#### **Data Protection Officer (DPO)**

Heather Leeson

Glenville Nutrition Ireland

10 Orwell Road

Rathgar

Dublin 6

[heather@glenvillenutrition.ie](mailto:heather@glenvillenutrition.ie)

01 4020777

### **4. Online Privacy Statement**

#### Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

*"any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".*

### How we use your information

This privacy notice tells you how we, Glenville Nutrition, will collect and use your personal data for your account, service fulfilment (including third parties), website cookies, profiling, and e-mail marketing.

### Why does Glenville Nutrition Ireland need to collect and store personal data?

In order for us to provide you with our service – including a professional account for the provision of Nutritional Therapy services, cookies, and email marketing, we need to collect personal data for correspondence and service. In any event, we are committed to ensuring that the information we collect, and use is appropriate for this purpose and does not constitute an invasion of your privacy.

### Will Glenville Nutrition Ireland share my personal data with anyone else?

We may pass your personal data on to third-party service providers contracted to Glenville Nutrition Ireland in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil laboratory diagnostic or data management services. When they no longer need your data to fulfil this service, they will dispose of the details in line with procedures agreed to by Glenville Nutrition. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

### How will Glenville Nutrition Ireland use the personal data it collects about me?

Glenville Nutrition Ireland will process (collect, store and use) the information you provide in a manner compatible with the General Data Protection Regulation (GDPR) and any subsequent data protection regulations. We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. Glenville Nutrition Ireland is required to retain certain information in accordance with the law, such as information needed for audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

### Under what circumstances will Glenville Nutrition Ireland contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions or send you any information that you might not reasonably expect to receive from us. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

### Can I find out the personal data that the organisation holds about me?

Glenville Nutrition Ireland, at your request, can confirm what information we hold about you and how it is processed. If Glenville Nutrition Ireland does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data.

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- Contact details of the data protection officer.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Glenville Nutrition Ireland or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing where these rights apply. • Information about your right to withdraw consent.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

### What forms of ID will I need to provide in order to access this?

Glenville Nutrition Ireland accepts the following forms of ID when information on your personal data is requested: Passport or driving licence in addition to a utility bill showing address (from the last 3 months).

### Contact details of the Data Protection Officer & GDPR Owner:

DPO

Heather Leeson  
Glenville Nutrition Ireland  
10 Orwell Road  
Rathgar  
Dublin 6  
[heather@glenvillenutrition.ie](mailto:heather@glenvillenutrition.ie)  
01 4020777

GDPR Owner:

Glenville Nutrition Ireland  
10 Orwell Road  
Rathgar  
Dublin 6  
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### Document owner and approval

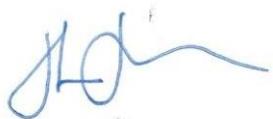
The Data Protection Officer is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

A current version of this document is available on request at any time, or on our website [www.glenvillenutrition.ie](http://www.glenvillenutrition.ie)

We keep our privacy notice under regular review.  
This notice was last updated on 25th May 2018

Signature

Date



25/05/2018