



BCNH PRIVACY POLICY

The General Data Protection Regulation 2016 (GDPR) is a Europe-wide law that replaces the Data Protection Act 1998 in the UK. It is part of the wider package of reform to the data protection landscape that includes the Data Protection Act 2018. The GDPR sets out requirements for how organisations will need to handle personal data from 25 May 2018.

BCNH holds information about you. Keeping this information safe and secure is our top priority. This policy outlines how that information is used, who we may share that information with and how we keep it secure. This policy does not provide exhaustive detail. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to admin@bcnh.co.uk. We keep our Privacy Policy under regular review. This Privacy Policy was last reviewed in December 2020.

For the purpose of the GDPR and DPA, the Data Controller is BCNH whose registered office is 79 Compayne Gardens, London NW6 3RW. BCNH has appointed a GDPR Officer who is responsible for ensuring BCNH's compliance with data protection regulations. The GDPR Officer can be contacted at admin@bcnh.co.uk, or by writing to the GDPR Officer at Barkat House, 116-118 Finchley Road, London NW3 5HT.

1. Information we may collect from you

You provide us with personal data in one or more of the following ways:

- By signing up to our mailing list via our website
- By completing an enquiry form via our website
- By completing an application form and providing accompanying documents
- By completing and signing a Learning Agreement and accompanying documents
- By applying for a DBS check
- Through email, over the telephone or by post
- By taking credit card and online payment

This may include the following information:

- basic details such as name, address, date of birth and contact details
- details about your academic and / or professional qualifications, and current occupation
- details about gender, nationality, ethnic origin, health and disabilities

All data is held securely in password protected electronic files, further protected with the latest security updates, patches and anti-virus software (hereafter referred to as "stored on our electronic database").

Data received from potential students is, subject to consent, held, as applicable, via MailChimp or transferred to and stored on our electronic database. (Potential students are defined as individuals who have signed up to our mailing list, made an enquiry or requested a prospectus via email, telephone or via our website but who have not yet completed our application form). This data includes name and email address, and details of the consent given. We hold this information in order to inform potential students about upcoming course webinars, and to circulate marketing information, including newsletters and our prospectus. **The legal basis for holding personal data about potential students is consent** (see No 4 – What are Your Rights - below).

Data provided by potential students who have completed our application form but who have not yet enrolled on one of our courses is stored on our electronic database. This data includes the data listed

above. **The legal basis for holding personal data about these individuals is consent** (see No 4 – What are Your Rights - below).

Data provided by students who have enrolled on one of our courses is stored on our electronic database and is used to provide an education in Nutritional Therapy, and for our own marketing purposes. This means that the legal basis of our holding this personal data is for BCNH's legitimate interest. Further detail is included in the BCNH Student Privacy Policy.

We also hold data (email addresses) for individuals who have contacted us in the past. This data is stored on our electronic database and is not processed in any other way. The legal basis for holding this data is BCNH's legitimate interest.

Data provided by clients as part of BCNH clinical training is stored on our electronic database only with the explicit consent of each client. **The legal basis for holding this data is consent.** Client consent to the recording of consultations during clinical training, and their use for teaching purposes, is explicitly provided in the Client Terms of Engagement. **The legal basis for processing this data is consent.** All recordings are stored on our electronic database and access restricted to authorised personnel only. Further detail is included in the Clinical Practice Privacy Policy.

2. How we use your personal data

We undertake at all times to protect your personal data, including any contact details, in a manner which is consistent with our duty of professional confidence and the requirements of GDPR and the DPA 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 also use your data for BCNH marketing purposes such as newsletters but this is subject to you giving us your express consent, e.g. via the Learning Agreement or via MailChimp communications.

3. Do you share my information with other organisations?

We will keep information about you confidential. We will only disclose your information to third parties with your express consent with the exception of the following categories:

- The Nutritional Therapy Education Commission (NTEC)
- The University of Greenwich
- Any contractors and advisors, including MailChimp, that 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

4. 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 admin@bcnh.co.uk. Under special circumstances, some information may be withheld. We shall respond within one month 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 NTEC guidelines or the University of Greenwich
- Receive a copy of your personal data, which you have provided to us, in a structured, commonly used and machine-readable format and 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 GDPR Officer at Suite 17-18, Barkat House, 116-118 Finchley Road, London NW3 5HT or email admin@bcnh.co.uk.

5. 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 and the DPA. 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 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 and restrict access to information to authorised personnel only. We ensure external data processors that 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.

BCNH is registered with the Information Commissioner's Office (ICO) as a data controller and collects data for a variety of purposes. A copy of the registration is available through the ICO website (search by business name).

6. How long do you hold confidential information for?

We retain personal data for 6 years after completion of, or withdrawal from, one of our courses, or after the date of your enquiry, whichever is later. This enables us to keep you informed about ongoing learning and career opportunities. In this case the legal basis of our holding your personal data is consent.

7. Complaints

If you have a complaint regarding the use of your personal data then please contact us by writing to the GDPR Officer at Suite 17-18, Barkat House, 116-118 Finchley Road, London NW3 5HT or email admin@bcnh.co.uk.

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