

Embrace Nutrition Privacy Notice

Keeping your information safe

Embrace Nutrition works with employers to provide workplace wellbeing programmes for their staff. We hold different personal data depending on your level of engagement with us as explained below.

Protection of your privacy is very important to us and this privacy notice explains how we use the personal data we collect from our website or provided by participants of our courses. Where we use the term “personal data” in this privacy notice, we mean any information that relates to you, including your name and e-mail address.

This notice sets out:

- What personal data we hold and why we process it
- The legal grounds which allow us to process your personal data
- Where the data comes from, who gets to see it and how long we keep it
- How to access your personal data and other rights that you have
- How to contact us

Embrace Nutrition takes great care to ensure your information is kept securely and used appropriately. Our staff are fully aware of this privacy notice and the need to protect your information. Embrace Nutrition is registered with the Information Commissioner’s Office, number ZC022688. If you have any queries about your data or this policy, you can contact us using the details given below.

<u>Embrace Nutrition Website</u>			
The following section explains how we process data you provide us through our website. www.embrace-nutrition.co.uk			
Engagement type	Personal data we hold about you	Why do we need this personal data and what is our lawful basis for processing it?	How long we keep it for
Contact Form – you can request information using the form on the Contact page on our website.	First Name Last Name Email	We need this information to be able to respond to your enquiry. <u>Lawful basis:</u> It is necessary for us to perform a legitimate interest. The legitimate interest is providing you with the information you request from us.	5 years after the request was made.
Subscribe to a mailing list – You can download content or sign up for activities we are running by subscribing to our mailing lists.	Email		
Registering for the Health Accelerator programme – You can register your interest in our Health Accelerator programme to be notified when enrolment opens.	Email First Name Last Name Phone Company Job Title		

Embrace Nutrition Health Accelerator Programme

The following section explains how we process data you provide us when enrolling on or whilst attending our Health Accelerator programme.

Engagement type	Personal data we hold about you	Why do we need this personal data and what is our lawful basis for processing it?	How long we keep it for
Course Enrolment – You must complete an enrolment form if you wish to join a Health Accelerator course.	Employer First Name Last Name Email Phone number Address Gender Date of birth Ethnicity Details about you and relevant information about your health, measurements, medication, wellbeing and relationship with food.	1) We need your contact information to contact you about the course sessions and send you course materials. (2) We use your employer name to check you are eligible for a place on the course. (3) We use your gender, date of birth, health and ethnicity information as a baseline measurement to track the changes in your health during the course and to identify health trends across ages, genders and ethnicities. (4) We also collect ethnicity for diversity monitoring purposes. <u>Lawful basis:</u> (1) It is necessary for us to perform a legitimate interest. The legitimate interest is providing you with the details of the course sessions and materials for those sessions. (2) & (3) Your explicit consent.	5 years after the end of the course you enrolled onto.
Blood Test Service	First Name Last Name Company Name Address	We need this information to be able to provide this service. <u>Lawful basis:</u> It is necessary for us to perform a legitimate interest. The legitimate interest is providing you with the information you request from us.	5 years after the end of the course you enrolled onto.
Continuous Glucose Monitor (CGM) Trial	First Name Last Name Company Name		5 years after the end of the course you enrolled onto.
After the course – we will ask for your new measurements, we will also invite you to repeat the blood test so you can see the	Details about your health, measurements and	We use this information to assess the effectiveness of the course.	5 years after you completed the course.

impact any changes have made on your health..	medication. You may wish to share other improvements in your health you have noticed since starting the course.	<u>Lawful basis:</u> Your explicit consent.	
On-going support – WhatsApp group - during the course you will be invited to join a closed WhatsApp group with other participants. This will be created by an Embrace Nutrition coach on their phone.	Name Phone number Any personal data you share in the WhatsApp group	We use your information to provide you within on-going support. <u>Lawful basis:</u> It is necessary for us to perform a legitimate interest. The legitimate interest is providing you with the service you request from us (i.e. support).	The WhatsApp group may continue at the request of the class members after the course has finished. You can leave the group at any time.
On-going support –Catch up sessions (virtual). We may run catch-up sessions which are recorded so that people not able to attend can watch them after the event. If you attend a session, you may appear in the recording. These files will be loaded onto Google drive managed by Embrace Nutrition.	Name Email Catch up session video recording - your face, voice, name or email address may be visible or audible if you participate, depending on the settings you select on the video conferencing platform (mute, video off etc.).	(1) We need your contact information to contact you with details about the sessions. (2) We use the recordings to allow people who can't attend, to watch the session back in their own time. <u>Lawful basis:</u> (1) It is necessary for us to perform a legitimate interest. The legitimate interest is providing you with details how to join the catch-up sessions. (2) If you choose to attend the sessions and have your video on and/or make oral contributions, we deem this to be an unambiguous indication that you are giving your consent.	Information will be kept for as long as there is a need to do so.
<p>No personal data are collected beyond the minimum necessary, and your data will be securely destroyed once there is no longer any need for us to keep it or you request for it to be deleted. Our services do not involve making any automated decisions about you.</p> <p>How is your data stored? Your data entered onto our website will be held within our Embrace Nutrition website which has been developed in collaboration with Wix. Data entered during enrolment will be held on the Google</p>			

Form then downloaded to a password protected private computer to manage our service and carry out data processing and reporting.

Sharing information with other organisations

When information is shared, it is passed securely and kept confidentially by the people who receive it. It will only be used for the purpose it has been shared for. This includes:

- With partners or service providers who process your personal data on our behalf; our health coaches, software providers such as Whatsapp and Google, Inuvi who supply our blood testing kits and Spirit Health who supply our Continuous Glucose Monitors.
- We will also share anonymised information with employers who commission our programmes. Course attendance records of staff will be shared with employers but reporting on all other aspects of the service will be in summary form only.

Anonymised Data

After the retention period has expired, Embrace Nutrition may store anonymised copies of your personal data for evaluation and future planning of our service. All data which uniquely identifies you as an individual will be removed, but the measurements we hold would remain..

Other reasons we may process your personal data

We may also need to process your personal data to respond to legal requests for information from third parties, including law enforcement; or in order to comply with a legal obligation; or to establish, exercise or defend a legal claim.

Your data rights

Under UK data protection law, you are entitled to the following rights: the right to access the personal data we hold about you and the right to request us to rectify personal data we hold about you. In some cases, you also have the right to request we erase your personal data; the right to restrict our processing of your personal data; the right to object to our processing of your personal data; the right to request us to transfer your personal data to a third party; the right to withdraw consent (where we rely on your consent to process your personal data); and the right not to be subject to a decision based solely on automated processing, including profiling. If you wish to exercise any of these rights, please contact us using the details set out below.

Contact us

Helen Gowers Director Embrace Nutrition

Address: 2 Levysdene, Guildford GU1 2RS Email: helen.gowers@embrace-nutrition.co.uk

How to complain

If you have any concerns or grievances regarding our data handling practices, we politely request that you raise these with us first using the details above. However, you do have the right to make a complaint to the ICO at the following address.

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF Helpline number: 0303 123 1113 ICO website: <https://www.ico.org.uk>

This Privacy Policy is on our website at <https://www.embrace-nutrition.co.uk/privacy-policy>