

Food To Fit Ltd Privacy Policy

This Privacy Notice explains how Food To Fit Ltd (F2F) will use any personal data we collect, your rights over any personal data we hold about you, and our policies and procedures for keeping your personal data secure. F2F complies with the principles of the GDPR and respects your privacy

Who We Are

Food To Fit Ltd (F2F) is an international nutrition and dietetic consultancy service, established in 1999 and based in Northamptonshire and London. F2F is owned by Jennette Higgs *Bsc(Hons) Nutrition RD RNutr*, who is the data protection officer (dpo). F2F is a data controller for the purposes of the EU General Data Protection Regulation 2018 (GDPR) and may also be a data processor, when working on specific projects with other contractors/clients.

Mailing address: Food To Fit Ltd., PO BOX 6057, Greens Norton, Northamptonshire, NN12 8GG

Registered Office: Parkgate 3, 9 Hampton Court Road, Kingston-upon-Thames, KT1 4AE.

Registered in England & Wales Company No 9027178.

What personal information do we collect?

F2F may obtain, process and store personal data solely for the purpose of effectively conducting specific projects. We are committed to protecting your personal information and being transparent about what information we hold about you. Personal data is any information about you which allows you to be identified from that data.

When you register with us via our websites (foodtofit.com & balancedplate.co.uk), or for an event or other specific activity, we will request personal information as necessary for the activity, via email or contact form and store the information you give us. This information may include:

- Name, email address, postal address, telephone number, IP address, company name, professional qualification and job title.
- Log in details – such as username and password preferences
- Payment details – such as your bank account details, if relevant
- A record of your emails and/or telephone calls for the period of a given project's reasonable lifetime.

Special categories of personal data, such as health information would only be processed where there is a clear need, such as specific dietary, medical or access requirements necessary for providing a safe environment for participants at an event F2F may be organising. When processing this data, we will always ask for your consent first. It will be held on our system and may be provided to a relevant third party if this is necessary for the purposes of fulfilling your requests (e.g. caterer or venue).

We do not intentionally collect or use any information from children and are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under and wish to utilise the services on our website, you must first ask your parent/guardian's permission before you provide us with personal information.

The legal basis we rely on to process your personal data

We only process personal information where we have a lawful basis for doing so, such as the following:

- User consent – This is where you have given us explicit permission to use personal information for a given purpose, such as if you register for an event or to receive information. We would ask for your consent if we wanted to use your personal information for any other purpose, such as marketing communications, using an 'opt-in' and 'opt-out' procedure.
- Contractual necessity – This is where we have to process personal information to meet our contractual obligations. For example, if you subscribe to a service with us, we would need to process your personal data in order to fulfil that service; when you make a purchase from us, you are entering into a contract with us. In order to perform this contract, we need to process and store your data. For example, we may need to contact you by email or telephone to provide consultancy services or in the case of any problems with your account.
- Legal obligation – This is where we have to process personal information in order to comply with the law. For example, we process and retain customer invoice information to comply with financial regulations.

We collect personal information as appropriate for our business purposes, as follows:

- To contact you by email, phone or post if required, about information relevant to the activity F2F is conducting and to which you have subscribed (e.g. events and other projects)
- To process information submitted by you in response to questionnaires or other activities that F2F may conduct
- To process a subscription or fulfil any bookings or orders that you have made with us, to one of our services or projects
- To provide you with relevant and focussed marketing communications by post, email, and/or phone about news and services relating to projects we are managing on behalf of our clients, where you have consented to be contacted for such purposes
- To enable you to create an account on our website and participate in our online activities when you choose to do so.
- To send you (non-marketing) communications required by law or which are necessary to inform you about our changes to the services we provide to you (e.g. updates to this Privacy Policy), where you have consented to be contacted for such purposes.
- To respond to enquiries from you.
- To responsibly carry out our contracted activities. For example, if F2F commenced a new project which may require the use of your personal data in a way not covered by this privacy policy. We would contact you giving details of this new use and confirm your consent prior to commencing any new processing.

Who we share your personal information with/Third parties

Other than as expressly set out in this privacy policy we will never disclose, share or sell your data without your consent, unless required to do so by law (e.g. for the purposes of prevention of fraud or other crime). We may receive personal information that you submit to any third party with whom we are working for a given project. We will only use that information in accordance with this privacy policy.

We may pass your information to our third party contractors or subcontractors as required for completion of a specific project. We will not release your information to third parties, unless you have consented to us doing so and then will only disclose that which is necessary. Both F2F and the third party operator will be the data controllers in respect of any such information and you should check the privacy policy of the third party to find out how they will use your data. This Policy applies solely to information collected by F2F and does not apply to any third parties.

F2F websites may contain links and references to other experts or websites, or advertisements that are operated by third parties. Our Privacy Policy does not apply to those third parties. Please consult the terms and conditions and privacy policy of those third party websites to find out how they collect and use your personal data.

Cookies and website analytics: To improve our websites, we may monitor and analyse information about how you use it and the content that you interact with, by using an analytics service provider (such as Google Analytics) for website traffic analysis and reporting. Analytics service providers generate statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated relating to the site may be used to create reports about the use of the site and the analytics service provider will store this information.

Cookies are small text files that are automatically placed onto your device by some websites that you visit. They are widely used to allow a website to function as well to provide website operators with information on how the site is being used for the purposes of making improvements. The information generated by the cookies about your use of the website (including your IP address) is transmitted to and stored by the analytics service provider (such as Google Analytics). By using our websites, you consent to the processing of data about you by analytics service providers.

How long we keep your personal information

We will hold your personal information for as long as necessary for the given project or activity, including for the purposes of satisfying any legal, accounting, or reporting requirements; or where applicable for the length of any relevant contract we hold with you. Contracts we hold with third party clients may require us to hold all information about the work we are contracted to carry out on their behalf for a period of time following completion of that activity. At the end of the retention period, your data will either be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis, business planning and/or reporting.

How we keep your personal information secure

We have appropriate administrative security measures in place to help ensure that once we have received your personal data it is protected against unauthorised or accidental access or use. Data transmission over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet. We will work to treat your personal data securely and in accordance with this Policy and the GDPR. The information we hold is stored securely on a password-protected computer system and within our website content management system. We ensure that our contractors and subcontractors are aware of their privacy and data security obligations and we limit access to your personal information to those, agents and other third parties who have a need to know.

Data Transfer outside the EU

F2F is based in the UK, although we collect data from overseas contacts during the course of our work. The information that we collect may therefore be transferred to the UK from any other country in which you may be located and will be subject to the GDPR and UK data protection laws.

F2F has international clients and subcontractors and some projects may require your personal data to be transferred, processed and/or stored outside the European Economic Area (EEA). F2F will not transfer personal data to any such third parties if there is any concern regarding the equivalent protection of personal rights. We will notify you when F2F is working with other contractors. By submitting your personal data, you agree to this transfer, storing or processing.

Your rights

Under data protection laws, you have rights as an individual in relation to the personal data we hold about you. These include the right to:

- access the personal data that we process about you
- request the restriction or deletion of your personal data
- request amendments or corrections to your personal data
- object to the processing of your personal data that we carry out
- data portability - you may request us to transfer some of your data to another data controller
- object to receiving any further communications from F2F
- lodge a complaint with the Information Commissioner's Office(ICO), Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. The ICO is the UK supervisory authority for data protection issues and has helpful information about your rights at: <https://ico.org.uk/for-the-public/> .

You can exercise these rights and ask any questions about this privacy policy or how we handle your personal information, by contacting us on dpo@foodtofit.com

This policy is effective from 23/05/2018. We will keep this privacy policy under regular review and any changes we may make will be posted on this page. If changes are significant, we may choose to notify you by email or to clearly indicate on our home page that the policy has been updated.