



## GDPR Compliant Privacy Policy

The following document explains how Plant Based Health Online Ltd. uses, processes and protects personal data collected via our website. We therefore request you to carefully read the following Privacy Policy as you will be legally bound by its terms whenever you visit our website or when you provide any personal data about yourself.

By continuing to use our website and services, you are deemed to agree to our terms and conditions and this Privacy Policy for the collection and processing of your personal data. Please note that any consent that is given for the purposes of medical consultation or examination is a separate consent from that granted for the processing of your personal data.

This Privacy Policy sets out our use of any and all data collected by us in relation to your use of our website, [www.plantbasedhealthonline.com](http://www.plantbasedhealthonline.com) ("Website"). The Website is operated by Plant Based Health Online Limited ("PBHO", "we", "us" and "our").

For the purposes of processing your personal data, we are the data controller (as set out under EU General Data Protection Regulation 2018 ("GDPR")). We are committed to protecting your privacy, both online and in the real world. We appreciate that you do not want the personal information you provide to us distributed indiscriminately and here we explain how we collect information; what we do with it and what controls you have over our processing of your information.

This Policy should be read in conjunction with our Terms and Conditions. We may amend or update this Privacy Policy from time to time and will publish revised versions on this website. We reserve the right to alter and make changes to this Policy at our

sole discretion and we therefore request all users to regularly refer to our Privacy Policy for updates and variations.

Who is the person responsible for the management of your data?

We are registered with the Information Commissioner's Office (ICO) under registration number ZA785847

The Person responsible for data protection is Dr Shireen Kassam..For any queries relating to the management of your personal data please do not hesitate to send us an email at [info@plantbasedhealthonline.com](mailto:info@plantbasedhealthonline.com)

What personal data do we need/receive?

"Personal Data" has been defined under the GDPR 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."

Any references to "personal data" in this Policy therefore means information about living individuals, which, alone or in conjunction with other information held by us is capable of identifying them. The Data Protection Act 2018 and the GDPR regulate our use of your personal data.

In order to provide our services or for the purposes of conducting our business we may need the following data from the individuals we are dealing with (We have tried to cover categories of data that we generally require while providing services to our clients or for operating our business. However, this is not an exhaustive list)

- Name(s) of the individual(s)
- Their physical and electronic addresses;
- Their phone number;

- If the client is a company, the company registration number and registered office address;
- For the purposes of making payments or any other transactions bank details;
- For employment purposes National Insurance number;
- In the case of patients their medical records and data relating to their health.

### Sources of personal data

We may obtain personal data from you when you contact us or get in touch with us via our Website or when you or your organisation correspond with us through any means of communication. This includes personal data you provide to us when you:

- Contact us with a question or query;
- Ask us to provide our services to you;
- Ask us to collaborate with you on any assignment;
- Contact us or authorise anyone to contact us about your medical history and medical or non-medical consultations provided via the PBHO platform;
- Contact us to provide us your services or goods;
- Correspond with us to submit any complaints that you may have;
- Correspond with us to address any complaints we may have raised;
- Register for a seminar, event where information is shared between fellow members;
- Register to receive updates and newsletters;
- Attend events and provide our staff with your personal information, business cards or contact details;
- Deal with us when we are providing services to our patients (which may be you, your organisation or a third party);
- Submit identity documents directly to us or to third party agencies commissioned by us to collect your data for the purposes of carrying out identity checks and due diligence;
- Contact us for the purposes of employment or apprenticeships;
- Connect with us on social media platforms.

We may also collect and retain personal data

- Obtained from public sources about you or your organisation, which includes all information available on your website, the Companies House or other online sources accessible through Search Engine Optimisation searches;
- Obtained from third parties, that may include our patients or their caregivers, fellow-professionals and their firms or clinics, professional regulators, public bodies, and other entities, including providers of analysis, screening and database services who have a right to disclose this information to us; and
- Relating to whether our contacts read electronic correspondence from us or click on links we send them.

How we use and share your information/data to help you

We need to keep a record of the care you receive to ensure that:

- Professionals involved in your care have accurate and up-to-date information about you;
- We have all the information necessary for assessing your needs and providing excellent care;
- Your concerns can be properly investigated if you raise a complaint;
- Accurate information about you is available if you:
  - a) Move to another area
  - b) Need to use another service
  - c) See a different doctor/healthcare professional.

Your record

We have a duty to:

- Maintain full and accurate records of the care we provide to you;
- Ensure that your records are confidential, secure and accurate;
- Provide a copy at your request that is in an accessible format (e.g. in large type if

you are partially sighted). Your record may include some or all of the following:

- a) Your name, address and date of birth;
- b) Contacts we have had with you, such as appointments;
- c) Notes and reports on your health;
- d) Details of treatment and care, images and test results;
- e) Information on medicines, side effects and allergies;
- f) Relevant information from people who care for you and know you well, such as health professionals and relatives; and
- g) The staff who see you may also add notes on their professional opinion.

If you wish us to, and if it is practical, we will discuss and agree with you what we are going to enter on your record and show you what we have recorded.

#### Identifying you as an individual

We have many patients/service users with similar names so it vitally important for all patients/service users to be properly identified as individuals. In order to be absolutely sure that you have been correctly identified we may ask you for a number of pieces of information. Suitable items include:

- Full name;
- Date of birth;
- Passport as photo ID;
- Driving licence as photo ID;
- Permanent (home, not a temporary) address.

We have tried to cover categories of data that we generally require while providing services to our patients. However, this is not an exhaustive list)

Where our patients have requested us to share their information with caregivers or relatives (expressly nominated by them and given their express consent) or where we have been approached by individuals for treatment of their dependents such but not

limited to elderly parents and/or any other dependents who are physically and/or mentally incapable of accessing the PBHO Platform, we will carry out a complete due diligence on such persons and for which we may need to collect all or any of the following data such as:

- Full name of the caregiver;
- Photo ID such as a passport copy or driving license copy;
- Permanent residential address and supporting documents for proof of address;
- Any document that proves that the patient has expressly appointed the individual as their caregiver;
- Any document that proves that the individual is the legal guardian of the patient (where the patient is above the age of 18 years but is physically or mentally incapacitated from participating in the medical consultations with PBHO);
- References from other relatives of the patient confirming that the patient is under the care of the caregiver or legal guardian.

Information will be shared with care-givers subject to satisfactory due diligence results.

Information will generally be shared with persons nominated as a patient's 'Emergency contact' or where an 'Emergency contact' has not been nominated, with the next of kin, particularly in cases of emergencies and where the interests (health) of the patient override our obligation of confidentiality. For such circumstances it shall be deemed that the patient has consented to their information being shared with the Emergency Contact or next of kin.

How you can help us to keep your health record accurate

- Let us know when you change address, telephone number or name;
- Tell us if any information relating to your record is incorrect;
- Inform us if there have been any changes or updates to your medical history, including changes to your diet or changes to the information relating to your use of any medication;
- Give your consent so that we can share information about you with other healthcare professionals to make sure you receive the right healthcare;

- Inform us if you are under the care of a caregiver and if you would like us to communicate your records, line of treatment, follow-ups and progress with them. As mentioned above any data will be shared with them subject to your express consent and/or subject to satisfactory results in relation to the due diligence that PBHO has carried out on them ;
- Tell us if you change your mind about how we share the information in your record(s).

#### How Plant Based Health Online Ltd. uses your contact details

We take your privacy seriously so please let us know how you want us to contact you.

- Via Telephone
  1. If you provide a mobile phone number: We may ring, leave a message or text you, so tell us if you do not want us to do so.  
If you provide a landline: We may leave a message, so tell us if you do not want us to do so.
- Via Email
  2. If you provide us with your email address: We may use it to send confidential health information, unless you have told us not to do so. Please read the following before providing us with your email address.
    - a) Emails can be quick and convenient and will allow you to keep a record (unlike a phone call). However, although our own systems are secure, it may be possible to intercept your email when it is being sent over the internet.
    - b) Also be aware that if you share your computer others may read your emails.
    - c) You could use email to contact staff in relation to a query or to ask about an appointment.

- d) Do not give more personal information than we need to process your request.
- e) Do not ask us to send you via email medical details that you would not want seen by other people.

If you have an urgent question or feel unwell after going home after treatment, contact an emergency service For example: 111 NHS Emergency Service or 999 for life threatening conditions by telephone, do NOT email.

How your records are kept

Our guiding principle is that we hold your records in strict confidence.

Plant Based Health Online Ltd is governed by the Data Protection Act 1998. It abides by the law and observes good practice in maintaining confidentiality and appropriate information security.

We will fulfil our obligations under this Act to the fullest extent, including ensuring that the following eight principles governing the processing of personal data are observed.

- i. personal data shall be processed fairly and lawfully;
- ii. personal data shall be obtained only for specified and lawful purposes, and shall not be processed in any manner incompatible with those purposes;
- iii. personal data shall be adequate, relevant and not excessive in relation to the purposes for which it is processed;
- iv. personal data shall be accurate and, where necessary, kept up to date;
- v. personal data shall be kept for no longer than is necessary for the purposes for which it is processed;
- vi. personal data shall be processed in accordance with the rights of data subjects under the Act;
- vii. personal data shall be subject to appropriate technical and organisational measures to protect against unauthorised or unlawful processing and accidental loss, destruction or damage;



- viii. personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of data protection

Plant Based Health Online Ltd is also registered with the Care Quality Commission ("CQC"). This means that we are subject to ongoing inspection and regulation by the CQC. This includes checks by the CQC that we are observing all the necessary and statutory guidelines for use of your data in line with Health and Social Care Act 2008 (Regulated Activities) Regulations 2014 (Part 3).

Information about you and the services you receive may be held in a number of formats and will be kept for the specific retention periods outlined by the relevant professional bodies. We use secure electronic systems to store user records, images and details of prescriptions. Patient data held on paper or disk will be processed in accordance with the Data Protection Act and destroyed using secure documented procedures at the end of the time periods set out by the Department of Health.

How your records are used

We use your records to:

- Ensure that any treatment or advisory services we provide to you are based on accurate information.
- Send a letter about your care to your GP or other healthcare professional at the end of your treatment, unless you tell us not to do so.
- Work effectively with other service providers providing you with treatment or advice.
- Monitor the quality of our care and help us to understand the outcomes of care provided via the PBHO platform ("Platform").

- Investigate any concerns or complaints you or your family have about your health care.

Provide information that is needed for financial transactions in relation to payment for treatment, such as billing. For private patients/service users this may include details shared with your insurance company. If you have any concerns about this, please contact your insurer. Currently PBHO do not have any collaborations or tie-ups with any insurance company. Should this change our Terms and Privacy Policy shall be updated accordingly.

- Enable us to provide you with the services and information offered through the Platform and which you request from us, for example to arrange a consultation. This may include sharing your data with one of our third-party service providers such as our consultant doctors or pharmacists, and sharing limited data with our call centre operatives;
- provide and administer your access to our Website and your account with us;
- verify and carry out financial transactions in relation to payments you make online;
- verify your identity;
- respond to communications from you;
- supply you with email, for example newsletters, alerts that you might have subscribed to (you may unsubscribe or opt-out at any time by following our unsubscribe instructions)

We need to use your personal information for those purposes to provide our services and to perform our contract with you. In some cases, the collection of data may be a statutory or contractual requirement and we will be limited in the services that we can provide to you without your consent to Us to be able to use such data.

We also collect, store and use the personal information listed above to:

- audit the downloading of data from the PBHO Platform to improve our service;
- learn and improve the layout and/or content of the pages of the Platform's Website and to better customise them for users;
- identify visitors to the PBHO Platform;
- carry out research on our user demographics; and
- tailor the information we send to you on the basis of the health data that you submit using the PBHO Platform.

We have a legitimate interest in using your personal information for these purposes, so that we can constantly improve our Platform, Website and our services, and to ensure that we are only sending you information that is going to be useful or relevant to you.

## Pharmacies

To process a prescription for medication on the PBHO Platform (as offered by a doctor or requested by you in accordance with our Terms and Conditions), it may be necessary to share basic identification data (such as your name, postal address, email address and phone number) with our dispensing pharmacy affiliate(s), taking all reasonable steps to protect your personal information, for the purposes of the pharmacy verifying your identification on collection of your prescription.

Finally, we use your personal information to:

send you information we think you may find useful or which you have requested from us, including information about our products and services or those of carefully selected third parties (such as information on relevant treatment and care offered by third parties), provided you have consented to being contacted for these purposes;

- allow, with your consent, carefully selected third parties to send you information directly which you may find useful regarding their products and services.

You can tell us not to contact you with information regarding our products and services or those of third parties or to share your details with third parties so that they can send you information regarding their products and services, in your profile on the Platform or where you do not wish us to continue to use your information in this way by following the unsubscribe instructions on any communications sent to you. You can also exercise the right at any time by contacting us using the contact details at the end of this Privacy Policy.

#### Anonymised data

We may remove your name and other details that could identify you so that we can use the information in your record anonymously to:

- Monitor and improve the quality of care received by patients/service users;
- Protect the health of the general public, for example we may share anonymous and aggregated patient information with organisations such as the National Institute for Clinical Excellence and the Cancer Registry for research or statistical purposes; and
- Train and educate staff.

Wherever possible, we anonymise your data or use a quasi- identifier such as a patient number or NHS number.

However, we may disclose your personal information if required to do so by law or if we believe that such action is necessary to prevent fraud or cyber-crime or to protect the Platform or the rights, property or personal safety of any person.

#### Sharing your health record

Plant Based Health Online Ltd has a designated Information Lead/Data Protection

Officer mentioned at the beginning of this Policy who is responsible for protecting the confidentiality of patient information, making sure that information is shared where this is appropriate and ensuring that the provisions of the GDPR and Data Protection Act are complied with.

To make sure you receive all the care and treatment you need, we may need to share the information in your health record with other staff and organisations. This could include, without limitation:

- Other healthcare professionals, such as doctors, pharmacists, and pathology and radiology staff involved in the analysis and reporting of diagnostic tests;
- Other hospitals and private sector organisations involved in your care;
- Local authority departments
- 
- Voluntary organisations providing on-going support;
- Administrative support staff.

Note that anyone who receives information from us also has a legal duty to keep it confidential.

We may also share information that identifies you where:

- You ask us to do so;
- We ask for specific permission and you agree to this;
- We are required to do this by law;
- We have special permission because we believe that the reasons for sharing are so important that they override our obligation of confidentiality (e.g. to prevent someone from being seriously harmed).

We do not give the names and addresses of patients/service users to other organisations except under the circumstances described in this Privacy Policy. Unless you have signed an additional consent, we will not contact you after your visit for purposes other than:

- Follow up of care;
- Collecting your views and feedback about your experience with us;
- Settlement of any account that may be due, if appropriate
- Complaints and concerns handling.

#### Sharing information with your family and friends

We will normally share information about the progress of your treatment with the person you name as your Emergency Contact, unless you have told us not to do so. Your Emergency Contact should be someone that you trust and feel close to. It does not have to be a blood relative; it can be a good friend. We ask patients/service users to name their Emergency Contact so that we know who you would like us to keep informed about the care we provide or the decisions we need to make. In identifying your Emergency Contact, you are giving us permission to keep her or him informed.

You can also name other people, with whom you would like us to share information about you, in which case we will carry out a due diligence on such persons and request them to submit relevant personal information for the purposes of the due diligence. We make best efforts to ensure that information provided over the telephone is restricted to those you have named, and we share this information on a need to know basis only and/or subject to a satisfactory due diligence. Sometimes this means refusing to disclose information about you to someone who feels they should know about your treatment and progress. Please make your family and friends aware of this.

For the purposes of this Privacy Policy “need to know basis” means that the recipient shall be given such information about a patient only if to do so is in the patient’s best interests and particularly where the health and safety of the patient over-rides PBHO’s obligation of confidentiality.

### Storage of Medical Information

All medical and other health information collected and supplied to PBHO will be treated as strictly confidential and all such data will be held strictly in accordance with, and as long as required, under UK regulatory codes of practice on records management and data privacy laws.

How long we keep your medical data: All health records are retained in digital form in a secure and encrypted environment and are confidentially stored in accordance with the retention periods set out in the NHS code of practice on records management, which may be updated from time-to-time.

### Special situations

Sometimes we have a legal duty to provide information about people; examples are reporting some infectious diseases, and when a court order/government regulations/NHS track and trace regulations and/or regulations analogous to the above require us to do so. Records may also be shared without the patient's consent in exceptional situations, such as to safeguard adults or children.

### External Regulation

The Care Quality Commission is the independent regulator of health care and they also protect the interests of people whose rights are restricted under the Mental Health Act. They routinely inspect our premises and/or records to quality check information we hold and the services we provide in line with the Health & Social Care Acts. This is designed to ensure that patients/service users using services are protected and receive

the care, treatment and support they need. These inspectors have the authority to access personal information without the permission of patients/service users.

### Sharing your records outside the EU

If your permanent address is outside the EU, or your treatment is continuing outside the EU, we may send details of your treatment to individuals based outside the EU specifically to promote your ongoing care. This would normally be the doctor who referred you to us for treatment. If you wish, we can give you the documents so that you have physical control over this information.

In the usual course of our business, we may use third parties to process and store your data on our behalf. We normally store your data on secure servers in the European Economic Area (EEA). Such processing is subject to contractual restrictions with regard to confidentiality and security in addition to the obligations imposed by the Data Protection Act 1998.

Exceptionally we may make use of suppliers based outside the EEA for processing and storing your data. We have strict controls over how and why your data can be accessed. By submitting your personal data, you agree to this.

Where necessary we may transfer personal information overseas for processing to support the long- term effectiveness of treatment and monitor patient outcomes. Personal information will be processed in this way where it is not possible to achieve this purpose with the use of anonymised or pseudonymised information only.

Where we transfer personal data to third parties outside of the EEA, we will ensure that the recipients are aware of the provisions of the GDPR and provide an adequate level of protection for the rights of persons whose personal data has been shared with them.

In addition, all our inbound and outbound email communications are TSL (Transport Security Layer) encrypted.



How can I stop my information from being shared?

Plant Based Health Online Ltd acts to provide information principally for other health and social care professionals who have requested this since they require further detailed investigations on their patients/service users. So naturally we will normally need to share this information with your doctor who has referred you to our service.

If you do not want us to share your information with your GP, other healthcare providers or carers, please tell the team looking after you. But please note that not sharing your information may affect the care that can be provided for you. Whilst in most circumstances we may strongly encourage you to inform your regular in-person GP of any health concerns you may have discussed with PBHO, we will not share information with your regular GP unless we have your express permission or there is an overriding public interest in disclosing the information without your consent. This is in accordance with the General Medical Council's guidance which may from time-to-time change.

You have the right to request that your confidential information is not used beyond your own care and treatment and to have your objections considered. Where your wishes cannot be followed you will be told the reasons including the legal basis. You may at any time withdraw any consent you have previously given to us to process information about you.

If you wish to exercise your right to opt-out, withdraw consent to use your information, or to speak to somebody to understand what impact this may have, please discuss your concerns with your doctor/healthcare professional, or email us typing 'Opt Out Request' in the subject line of the email.

Your legal rights

Plant Based Health Online Ltd is the Data Controller of the data it holds about its patients/service users and staff.

- (1) You have the right to confidentiality under the Data Protection Act 1998 (DPA), the Human Rights Act 1998 and the Common Law Duty of Confidentiality. The Equality Act 2010 may also apply.
- (2) You have the right to know what information we hold about you, what we use it for and if the information is to be shared, who it will be shared with.
- (3) You have the right to apply for access to the information we hold about you. Other people can also apply to access your health records on your behalf. These include anyone authorised by you in writing (such as a solicitor), or any person appointed by a court to manage your affairs where you cannot manage them yourself. Access covers:
  - The right to obtain a copy of your record in permanent form (“subject access rights”);
  - The right to have the information provided to you in a way you can understand, and explained where necessary, for example where abbreviations have been used. You would not be entitled to see information that:
    - (a) Has been provided about you by someone else if they haven’t given permission for you to see it
    - (b) Identifies another person who has not given permission for you to see the information about them
    - (c) Relates to criminal offences
    - (d) Is being used to detect or prevent crime
    - (e) Could cause physical or mental harm to you or someone else.

If you are currently receiving services from us and wish to view the record without obtaining a copy, discuss your request with the professional in charge of your care.

## Obtaining a copy of your record

If you wish to apply for access to the information, we hold about you:

- You should send your request in writing to us.
- You should provide enough information to enable us to correctly identify your records, for example include your full name, address, date of birth, any unique identifier number/ NHS number (if known)
- We will take every reasonable step to respond to you within 1 (one) month of receiving your request.
- You may be required to provide a form of ID before any information is released to you.  
Once you receive your records, if you believe any information is inaccurate or incorrect, please inform us.

(4) You have the right to prevent us using your data for direct marketing;

(5) You have the right to have (in certain circumstances) inaccurate personal data corrected, blocked or destroyed;

(6) You have the right to object to automated decisions. PBHO do not, however, use automated decision making;

(7) You have the right to obtain compensation through legal proceedings for damage caused by a breach of the Data Protection Act;

(8) You have the right to withdraw consent from us continuing to process your personal data; and

(9) You have the right to object to processing that is likely to cause or is causing damage or distress.

(10) You have the right of erasure or destruction of your personal data held by us.

(11) You have the right to lodge a complaint should you feel your personal data is not being collected, processed or used correctly.

If you want to (1) tell us to stop using your data for direct marketing or withdraw consent from us processing your personal data for any of the purposes mentioned in this Policy; (2) exercise your subject access rights; (3) tell us about inaccurate personal data you think we hold on you; or (4) object to a use you believe we're making of your data which is causing, or is likely to cause, damage or distress, please contact our Data Protection Manager at [info@plantbasedhealthonline.com](mailto:info@plantbasedhealthonline.com) or write to us at this address:

Dr Shireen Kassam  
Plant Based Health Online  
29 Stonehill Road, Headley Down  
Bordon, England GU35 8HF

Unless the law permits us to do so, we will not charge you to exercise your subject access rights but may charge a reasonable fee reflecting our administrative costs should you request further copies of the personal data. When you contact us to exercise any of the above rights, we will first ensure that the person requesting the data is the person whose data is being sought (or that it is being requested on that person's behalf). This may involve providing us with proof of your identity or your authority to act for the data subject. We may also ask you for any information we need to help us find the personal data you're enquiring about.

We will also provide you with the following information relating to your personal data:

- the purpose for which we're processing it;
- what categories of data about you we process;
- the recipients of your data, if any, including specifically international or foreign organisations;
- our expected retention period or how we'll calculate this, if we don't know yet;
- your rights in relation to the data; and
- the source of the data, if we didn't get it from you.

Should you contact us in relation to us holding incorrect, incomplete or inaccurate data about you, we will make the required corrections promptly.

#### Right to lodge a complaint

If you are unhappy with the way, we are processing your personal data you can lodge a complaint by writing to our Data Protection Manager at [info@plantbasedhealthonline.com](mailto:info@plantbasedhealthonline.com) or by sending your complaint to:

Dr Shireen Kassam  
Plant Based Health Online  
29 Stonehill Road, Headley Down  
Bordon, England GU35 8HF

You are also entitled to make a complaint at the Information Commissioner's Office ([ICO](#)).

#### Payment Processing

Payments made on the Platform are made through our payment solutions provider Stripe at [www.stripe.com](http://www.stripe.com), 3180 18th Street, Suite 100, San Francisco, CA 94110, USA. You will be providing your email address and your credit or debit card information directly to "Stripe", a company located in the USA and which operates a secure server to process payment details, encrypting your credit/debit card information and authorising payment. This payment processor adheres to the standards set by PCI - DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure this secure handling of payment information. Information which you supply to Stripe is not within our control and is subject to Stripe's own privacy policy and terms and conditions available at [Stripe's website](#).

## External Links

The Platform may, from time to time, contain links to external sites affiliated to us or run by independent third parties. Please note that this Privacy Policy applies only to the personal information that we collect through this Website and we cannot be responsible for personal information that third parties may collect, store and use through their website and we are not responsible for the privacy policies or the content of such sites. You should always read the privacy policy of each website you visit carefully.

## Children's Privacy

Our service does not address anyone under the ages of 18 ("children"/ "child"/ "minor")

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your child has provided us with Personal Data, please contact us. If we become aware that we have collected personal data from children without verifications of parental/legal guardian's consent, we take steps to remove that information from our servers

## Cookies

The Website also uses cookies or similar technology to collect information about your access to the Website.

Cookies are pieces of information that include a unique reference code that a website transfers to your device to store and sometimes track information about you. A number of cookies we use last only for the duration of your web session and expire when you close your browser. Other cookies are used to remember you when you return to the Website and will last for longer.

We use cookies to:

- remember that you have used the Website before (this means we can identify the number of unique visitors we receive, and this allows us to make sure that we have enough capacity for the number of users we get);
- allow you to navigate the Website more quickly and easily;
- remember your login session so you can move from one page to another within the Website;
- store your preferences;
- customise elements of the layout and/or content of the pages of the Website for you; and
- collect statistical information about how you use the Website so that we can improve the Website.

All cookies used on our Website are set by us.

Most computer and some mobile web browsers automatically accept cookies but, if you prefer, you can change your browser to prevent that or to notify you each time a cookie is set. You can also learn more about cookies by visiting [www.allaboutcookies.org](http://www.allaboutcookies.org) which includes additional useful information on cookies and how to block cookies using different types of browsers. Please note however, that by blocking or deleting cookies you may not be able to take full advantage of the Website.

We may also use a web-based analytics tool that tracks and reports on the manner in which the Website is used to help us to improve it. The information that the cookies collect, such as the number of visitors to the site, the pages visited and the length of time spent on the site, may be aggregated and will therefore be anonymous.

We don't use cookies in a way that allows us to identify site users.

We may during the course of our business use Google Analytics to enable us to see what content is popular on our Website so that we can continue providing content and information that our users enjoy reading and improve the Website experience for our users. The details relating to the Google Analytics tool are as follows:

Personal Data collected: Cookies and Usage Data

Place of processing: United States of America

[Privacy Policy](#) [Opt-Out](#)

In addition, please note that for the purposes of running and managing the Plant Based Health Online Platform we use "Hey Doc" which is a fully integrated and cloud-based system that helps manage patients' medical data, thereby enabling healthcare platforms to engage with their patients. The "Hey Doc" system enables us to record data, to automate tasks such as invoicing and sending out pre-consultation questionnaires, to communicate securely with our patients and staff and to integrate with third party service providers.

Please read the Hey Doc [Privacy Policy](#).

### Variations to the Policy

This Privacy Policy is effective immediately and will remain in effect until further notice.

We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of the Service after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide by and be bound by the modified Privacy Policy.

### Security

We place great importance on the security of all personally identifiable information associated with our users. We have security measures in place to attempt to protect against the loss, misuse and alteration of personal information under our control. Our security and privacy policies are periodically reviewed and enhanced as necessary and only authorised personnel have access to personal information. Whilst we cannot



ensure or guarantee that loss, misuse or alteration of information will never occur, we use all reasonable efforts to prevent it from occurring.

You should bear in mind that submission of information over the internet is never entirely secure and whilst we take appropriate technical and organisational measures to safeguard the personal information you provide to use, we cannot guarantee the security of information you submit via the Platform whilst it is in transit over the internet and any such submission is at your own risk.

You should always log out from the PBHO Platform and close your browser when you have finished your user session to help ensure others do not access your personal information, particularly if you use a shared computer or a computer in a public place.

### Storage of your information

Information that you submit via the Platform is sent to and stored on secure servers located in the EU (except for the specific exceptions set out in this policy, including certain recorded data processed and stored by our communications software provider). This is necessary in order to process the information in accordance with this Policy.

### Further Questions

If you have any further questions about this Privacy Policy, or if anything is not clear, please let us know, by emailing us at [info@plantbasedhealthonline.com](mailto:info@plantbasedhealthonline.com)

Further information about data protection issues can be found at:

Information Commissioner's Office (ICO)

The Information Commissioner's Office Wycliffe House

Cheshire SK9 5AF

Helpline: 08456 30 60 60

Website: [www.ico.gov.uk](http://www.ico.gov.uk)