# **Privacy Policy**

#### 1. Introduction

This privacy policy is about how the Yukiko Nutrition collects, processes, stores and shares member's data.

This Privacy Policy only relates to personal data collected by the Yukiko Nutrition via the Yukiko Nutrition website, application forms, emails and telephone calls. Any personal data collected by the Yukiko Nutrition is used in accordance with UK data protection legislation.

Users should be aware that if they access other websites, using the links provided, these are outside our control. If they provide personal data to other companies, the privacy policies of those companies determine the uses to which that information is put and the Yukiko Nutrition Privacy Policy will no longer apply.

## 2. The Data Protection Bill 2017

The [YOUR COMPANY] complies with the principles of the <u>Data Protection Bill 2017</u> in accordance with <u>General Data Protection Regulations (GDPR)</u>.

## 3. Purpose of data

The data we collect from members is the data required to provide professional services to members, communicate with members and validate and verify the legitimacy of clients. The data held by Yukiko Nutrition is collected at the time of application by members and includes name, surname, home address, clinic address, email, phone number(s), website, certificates of qualifications and records of continued professional development.

## 4. Disclosures - Sharing of data

We may disclose your personal information (including to trusted third parties) for the purposes for which is primarily held or for a related secondary purpose and in some cases we may disclose information without your consent. Your personal and sensitive information may be disclosed to Yukiko Nutrition employees, Yukiko Nutrition representatives, service providers we use to deliver aspects of our service such as database or email software facilities.

Data is shared via member numbers with insurance providers for the purposes of verifying the legitimacy of insurance applicants.

Data is shared upon request on behalf of a member with external companies that provide practitioner services to verify qualification and status claims.

Data is shared with our regulator the General Naturopathic Council for the purposes of registering practitioners on a public register, and confirming their status as a fully qualified, voluntarily regulated practitioner.

Data is shared internally with administrators for the purpose of verifying payments and refunds.

## 5. Legacy data

Applicants to Yukiko Nutrition accepted or otherwise are kept on record for up to 3 years. Applicants who have been barred, banned or otherwise excluded from membership are kept on record to prevent renewed access to the Association in keeping with the interests of public safety.

## 6. Device specific data

The following information may be collected through your device and browser:

- Your devices IP address (collected and stored in an anonymized format)
- Your email address including first name and surname
- · Device screen size
- Device type (unique identifiers) and browser information
- Geographic location (country only)
- Preferred language used to display the webpage

## 7. Digital Log data

Our servers automatically record information which is created using our software. Data includes:

- Referring domain
- Pages visited
- Geographic location (country only)
- Preferred language used to display information

Date and time when pages were accessed or created

#### 8. Consent

Yukiko Nutrition membership is an optional process. By joining Yukiko Nutrition, members consent via their application to receive information relating to the activities of Yukiko Nutrition in the form of newsletters, regulatory updates, upcoming seminars, webinars, events, training, special offers and information relevant to the profession.

## 9. Opting out

Opt out mechanisms are in place on all Yukiko Nutrition mailings and communications. Users can choose to opt out at any time by clicking the opt-out button at the bottom of mailings or emailing Yukiko Nutrition directly with a request to opt out.

#### 10. Use Made of Personal Information

Personal information provided to the Yukiko Nutrition will be used for the purposes of providing services to our members. Any personal information which is collected by the Yukiko Nutrition will be used by the Yukiko Nutrition only in accordance with current data protection legislation.

In addition, personal information may be used for statistical analysis.

Personal data will be collected and processed by the Yukiko NUtrition for the following purposes:

- (1) To process your membership
- (2) Administration
- (3)To validate and confirm your insurance application
- (4)To validate and confirm your rights to access free and discounted offers with external companies
- (5)To validate and confirm your status (at your request) to external companies
- (6)To process CPD certificates
- (7)To register your attendance at Yukiko Nutrition events
- (8)To record complaints or misdemeanours.

Processing personal data for the above purposes may entail sharing the information with employees, contractors, agents and professional advisors and regulators of the Yukiko Nutrition.

Written agreements exist between the Yukiko Nutrition and such parties that there must be no further disclosure of such personal data.

#### 11. Consent

By providing personal data to the Yukiko Nutrition users consent to the processing of such data by the Yukiko Nutrition as described in this Privacy Policy.

## 12. Verifying, updating and amending your personal information

If, at any time, a user wants to verify, update or amend their personal data they may write to:

Yukiko Sakita

Yukiko Nutrition

contact@yukikonutrition.com

Verification, updating or amendment of personal data takes place within 10 working days

## 13. Storage of personal data

Data is stored in a secured, encrypted, cloud based database. Payments are processed according to the requirements of 12.9 PCI DSS v3.2 in accordance with <u>PCI security</u> standards.

## 14. Processing of data

Personal and financial data is processed and handled via Amazon Web Services (AWS), the world's largest cloud provider with recognised certifications and audits PCI DSS Level 1, ISO 27001, FISMA Moderate, FedRAMP, HIPAA and SOC 1, SOC 2 and SOC 3 audit reports.

All personal data is fully backed up and stored in highly secure AWS data centres, with immediate notification and recovery in place in the event of a data breach.

PayPal is used to process payments for memberships and sponsorships. All PayPal transactions are subject to the <u>PayPal privacy policy</u>. All data handled by PayPal is handled securely by a single data controller for administrative purposes.

#### 15. Cookies

A "cookie" is a small text file that is placed on a user's computer hard drive by a website. There are several types of cookie and the most common are often referred to as 'session' cookies. These are used to keep track of information needed by a user as they travel from page to page within a website. These cookies have a short lifetime and expire within a few minutes of the user leaving the site.

Other types of cookies can be used to track internet activity after the user has left a website. These are usually sponsored by organisations external to the website being visited and are generally known as 'third party' cookies. These usually have a long lifetime with several months being quite common. They are 'harvested' and 'refreshed' whenever the user visits a page where the same or a similar cookie is being used.

The Yukiko Nutrition uses benign, short lived 'session' cookies to tell whether a website user has logged in, where to find details that can be used to pre-fill parts of on-line forms and to personalise the user's visit to the website.

Yukiko Nutrition cookies do not analyse visits to other website or any searches undertaken whilst on the Yukiko Nutrition website.

Internet browsers normally accept cookies by default; however, it is possible to set a browser to reject cookies. If this is done it is important not to exclude the benign and useful session cookies. Choose an option that rejects all third party and long lived cookies.

The Yukiko Nutrition uses cookie free technology that uses Internet Protocol (IP) information exchanged during the course of normal web activity combined with data enhancement technology to get detailed analytics information.

## 16. Links to Third Party Websites

This Privacy Policy applies solely to the personal data collected by the Yukiko Nutrition and does not apply to third party websites.

The Yukiko Nutrition is not responsible for the privacy policies of third party websites. The Yukiko Nutrition advises users to read the privacy policies of other websites before registering any personal data.

## 17. Security

The Yukiko Nutrition holds your personal data in accordance with the security provisions of the UK data protection legislation.

If you have any questions about security please contact the Yukiko Nutrition on contact@yukikonutrition.com

# 18. Notification of Changes

The Yukiko Nutrition will notify all users of any changes it makes to its Privacy Policy. If the Yukiko Nutrition decides to change its Privacy Policy, it will post such changes on this page so that you are always aware of how the Yukiko Nutrition uses your personal data.

Users have the right to ask the Yukiko Nutrition, in writing, for a copy of all the personal data held about them upon payment of a fee ("subject access request") and to request that the Yukiko Nutrition correct any inaccuracies in that information.

## 19. Your rights over your data

You have the right to rectify, amend, correct or erase your data except where there is a <u>legal basis for refusal</u>.