

## **Your privacy matters**

### ***Updated October 2019***

Here at Nualtra we acknowledge the importance of protecting your privacy and we care about how your personal data is used.

Our Privacy Statement provides information on the kind of data we collect, why it is required, how it is used and the benefits this can give to you.

If you have any comments or queries, or you wish to discuss your data subject rights, you can contact us at [support@nualtra.co.uk](mailto:support@nualtra.co.uk)

### **Our commitment to you**

The Nualtra team aim to responsibly protect and manage your personal data and we are committed to conducting our business in a transparent manner. We value your trust; therefore, we commit to protect your privacy rights.

### **Our core privacy values**

To use some of our services, products or information, your personal data may be required, however, there is no obligation for you to provide personal data when requested by us;

The data we collect and process is only used for the purposes highlighted in our Privacy Statement or for other specific purposes, which you have consented to;

We will request, collect, process and use as little personal data about you as possible;

The personal data we do collect will be kept as current and accurate as possible;

When any personal data we have collected is no longer required for any purposes and the law states that we are not required to retain it, we will take every step to responsibly delete or destroy it, or where required, ensure it is no longer identifiable.

Other than described in our Privacy Statement, we do not share, sell, lease or disclose your personal data.

## The personal data we collect.

Depending on the purpose of the collection or the type of products or services you require from us, the personal data we collect will vary.

Below is a table to show the type of personal data we often collect directly from you here at Nualtra.

Type of data	Examples	Why?
Personal contact data	Your name, email address, physical address and telephone numbers	To ensure we can identify who you are and where we need to send the product, information or services you have requested from us
Correspondence with us	This may include details of our conversations via chat, care lines and/or customer service lines or sales representatives. Emails or other written correspondence	To ensure we have a record of the product, information or services you need; or to document any complaints or concerns
Browser history	Such as pages accessed, date of access, location when accessed, and IP address	To ensure we offer you the best possible experience when visiting our website or ordering samples
Information about people other than you	Such as personal data about your patients, when you provide such information directly to us via our sample service	To ensure our sample products reach your patients as requested by you
If ever you apply for employment with us	We will collect additional personal data, such as your employment history, educational history and employment references	To determine whether you are suitable/not suitable for the role advertised

## Why does Nualtra collect and use my personal data?

Collecting your personal data means we can give you high quality customer service and a great online experience. Your personal data may be collected, held, used and disclosed for the following purposes listed in our table below.

To identify you	To authenticate the identity of individuals contacting us by telephone, electronic means or otherwise
To support you	To process and answer your inquiries or to contact you in order to answer your questions and/or requests
	To process your orders of products, to provide you with your order status, deal with your enquiries and requests, and assess and handle any complaints
To communicate with you	To communicate information to you and to manage your registration and/or subscription to our newsletter or other communications
	To provide personalised products and communications as well as product recommendations to you
To support product, information and service development	To develop and improve our products, services, communication methods and the functionality of our websites
	To understand and assess the interests, wants, and changing needs of customers, in order to improving our website, our current products and services, and/or developing new products and services, this may include visits from Nualtra Representatives
	For internal training and quality assurance purposes
Legal stuff	We may also need your personal data to comply with legal obligations or in the context of a contractual relationship that we have with you

If we collect or use your personal data for purposes listed above or for any other purpose, we will always inform you before or at the time of collection.

Nualtra Ltd, Basepoint Business Centre, Oakfield Close, Tewkesbury, Gloucestershire, GL20 8SD

[support@nualtra.co.uk](mailto:support@nualtra.co.uk) | 0118 4532853 (toll free number)

## **Consent**

We will request your consent, where appropriate, to process your personal data. You have the right to withdraw your consent at any time.

## **What are my rights?**

At any time, you have the right to access, update or correct your personal data. If you wish to do so or you have any questions or queries about this, you can contact us at [support@nualtra.co.uk](mailto:support@nualtra.co.uk).

## **Data portability**

Personal data is portable and can be moved, copied or shared electronically. The right only applies where:

- You have consented to the processing;
- The processing takes place for the performance of a contract;
- The processing takes place by automated means;
- Please contact us if you wish to exercise your right to data portability:  
[support@nualtra.co.uk](mailto:support@nualtra.co.uk)

## **Deletion of your personal data**

You have the right to request that we delete your data when:

- your personal data is no longer necessary in relation to the purposes for which we collected it; or
- you withdraw the consent that you had previously given us to process your personal data, and there is no other legal ground to process that personal data; or
- you object to us processing your personal data for direct marketing purposes; or
- you object to us processing your personal data for Nualtra's legitimate interests (such as improving overall user experience on websites);
- the personal data is not being processed lawfully; or
- your personal data needs to be deleted to comply with the law

You can contact us at any time if you wish to delete the personal data we hold about you.

Please contact us at [support@nualtra.co.uk](mailto:support@nualtra.co.uk). We will respond to your request in accordance with legal requirements.

If the personal data we collect is no longer needed for any purposes and we are not required by law to keep it, we will take every step to responsibly delete or destroy it, or where required, ensure it is no longer identifiable.

### **Restriction of processing**

It is your right to restrict the processing of your personal data if

- you do not believe the personal data we have about you is accurate; or
- the personal data is not being processed lawfully, but instead of deleting the personal data, you would prefer us to restrict processing instead; or
- we no longer need your personal data for the purposes we collected it, but you require the data in order to establish, exercise or defend legal claims; or
- you have objected to the processing of your personal data and are awaiting verification on whether your interests related to that objection outweigh the legitimate grounds for processing your data.

If you wish to restrict our processing of your personal data, please let us know and we will take reasonable steps to respond to your request in accordance with legal requirements.

### **Your right to object**

At any time, you have the right to object to the processing of any of your personal data. You can contact us at [support@nualtra.co.uk](mailto:support@nualtra.co.uk)

### **Your right to lodge a complaint with a supervisory authority**

It is your right to directly place a complaint with a supervisory authority regarding the way we process personal data.

### **Protecting your personal data**

Your personal data security is important to us. We take reasonable steps to protect your personal data from abuse, interference, loss or damage, unauthorised access, adjustment or disclosure.

We have numerous security measures in place to protect your personal data as much as possible. These include controlled access to personal information, use of firewalls and secure servers. We also encrypt personal data.

### **Sharing your personal data**

If there is a need for your data to be shared with other organisations, we will ensure we only do so with organisations that follow the same or similar data protection measures that we do.

We will not share, sell, lease or disclose your personal data other than as stated in this Privacy Statement. There may be occasions when we are required to share your personal data if stated by the law and/or government authorities.



Your personal data will be shared with the following third parties for the purposes described below:

Category of third parties:	Data type:	Purposes:
Pharmacies	Patient name and address and product ordered	Fulfilment of sending product samples
Email marketing platforms	Name, email address, areas of interest	Execution of newsletter handling
Online sample service	HCP name and address, product ordered. Patient name and address	Fulfilment of sending product samples to patients

### **Cookies and other technologies**

We may also collect personal data about you through the use of cookies and other technologies. This may occur when you visit our sites or third-party sites, view our online promotions, or use our/third-party mobile applications and may include the following information:

Information about your device browser and operating system;

The IP address of the device you are using;

Web pages of ours that you view;

Links that you click while interactive with our services

Please see our cookie statement for more information on this.

### **Contact us**

If you have any questions, comments or complaints regarding this Privacy Statement or the processing of your personal data, please contact us via our contact page.

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