

PHC Privacy Notice

Keeping your information safe

The Public Health Collaboration (PHC) is a registered UK charity (No 1171887) dedicated to improving public health. Protection of your privacy is very important to us and this Privacy Notice explains how we use personal data we collect about participants of events, activities or courses run by or on behalf of PHC, including The Lifestyle Club Diabetes (TLC-D); The Lifestyle Club Wellbeing (TLC-W), Liberate; members of PHC; and anyone else to whom we provide a copy of or link to this Privacy Notice.

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

PHC takes great care to ensure your information is kept securely and used appropriately. Our staff and volunteers are fully aware of this privacy notice and the need to protect your information. PHC is registered with the Information Commissioner’s Office, number 00019429641. If you have any queries about your data or this policy, you can contact our Data Protection Officer using the details given below.

The rest of this document is divided up into different sections depending on your relationship with PHC. Please refer to the sections relevant to you.

<u>The Lifestyle Club Diabetes</u>			
The Lifestyle Club Diabetes (TLC-D) is a health coaching service developed by PHC for adults with type 2 diabetes or prediabetes. We will hold different personal data depending on your level of engagement with us. The following section explains how and why we process your personal data when you participate in TLC-D.			
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
Referral – you can register your interest in a TLC-D Information Session via our booking website or from our on-line TLC shop	Name Email Phone number Funding organisation (This may be your GP surgery, employer or another organisation.	We need this information to be able to contact you with details about the session and to ensure that you are eligible for a place on the course.	5 years after the Information Session takes place (even if you cancel your booking).

	You may be self-funding your own course.)	<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 and to ensure we only accept referrals from organisations that have an agreement with us.	
Enrolment – You must complete an enrolment form if you wish to join a TLC-D course.	Name Funding organisation (This may be your GP surgery, employer or other organisation. You may be self-funding your own course.) Email Phone number Address Gender Date of birth NHS number Ethnicity Details about you and relevant information about your health measurements and medication	(1) We need your contact information to contact you about the course sessions and send you course materials. (2) We use your funding organisation 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.
PHC mailing list – on enrolment, you will be asked if you want to join the mailing list for our charity Public Health Collaboration.	Name Email	To send you updates from the TLC-D community and details of our monthly catch-up sessions and support HUBs.	We will keep your personal data for this purpose for as long as you continue to consent to receiving emails from us. You

		<u>Lawful basis:</u> Your consent.	can unsubscribe from the PHC mailing list at any time by clicking the unsubscribe button at the bottom of the emails.
During the course – we may contact your GP and ask them to provide these details, or we may obtain these directly from you.	NHS number HbA1c And we may collect other relevant measurements such as Total cholesterol LDL cholesterol HDL cholesterol Triglycerides Liver function test results Kidney function test results QRISK score and medication	We use these details to track the changes in your health during the course. <u>Lawful basis:</u> Your explicit consent.	5 years after the end of the course you enrolled onto.
After the course – we may occasionally contact you and request up to date information on your health for up to 5 years. Participation in this is optional and you can opt out of being contacted at any time.	Details about your health measurements and medication. You may wish to share other improvements in your health you have noticed since starting the course.	We use this information to assess the effectiveness of the course. <u>Lawful basis:</u> Your explicit consent.	5 years after you completed the course.
On-going support – WhatsApp group - during the course you will be invited to join a closed WhatsApp group with other participants from your class. This will be created by your health 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. If you have any queries about WhatsApp please refer to their WhatsApp privacy policy.
On-going support – PHC catch up sessions (virtual). Our catch-up	Name Email	(1) We need your contact information to contact you with details about the	Information will be kept for as long as

<p>sessions 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 are loaded onto an unlisted YouTube channel managed by the Public Health Collaboration.</p>	<p>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.).</p>	<p>sessions. (2) We use the recordings to allow people who can't attend, to watch the session back in their own time.</p> <p><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 for your image and voice to be recorded and used in this way.</p>	<p>there is a need to do so.</p>
<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.</p> <p>Our services do not involve making any automated decisions about you.</p> <p>How is your data stored? Your data is held within the UK and not transferred to any other country except when we post the TLC-D catch-up sessions on Youtube (see Google's privacy notice here https://policies.google.com/privacy?hl=en#intro) and when we transfer your email address to WordPress to assist us in sending mailings to you (see WordPress's privacy notice here: https://en-gb.wordpress.org/about/privacy/)</p> <p>Consent to obtaining your information from your GP When you enrol on a TLC-D course, we ask for your consent to contact your GP to gather recent health measurements at the beginning of the course and at 3-month, 6-month, 1 year and 2 year time points after the course has ended. We will only do this if you have given us your explicit consent.</p> <p>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:</p> <ul style="list-style-type: none"> • Requests by PHC to your GP for your health results at the start and end of the course are made via encrypted NHS email. • With various service providers who process your personal data on our behalf. These include our health coaches, software providers such as Whatsapp (see above) and Microsoft, IT 			

support from AzTech IT and X-PERT Health who provides us with various reports on an individual's progress over the course.

- We may also share anonymised information with organisations who fund our courses or that help plan local health and care such as Clinical Commissioning Groups (CCGs). Personal identifiers (such as your name and email) are removed before sharing.

Anonymised Data

After the retention period has expired, TLC-D 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..

The Lifestyle Club Wellbeing

The Lifestyle Club (TLC-W) is a health coaching service developed by PHC for adults wishing to improve their metabolic health and wellbeing. We will hold different personal data depending on your level of engagement with us. The following section explains how and why we process your personal data when you participate in TLC-W.

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
Referral – you can register your interest in a TLC-W Information Session via our booking website.	Name Funding organisation (This may be your GP surgery, employer or other organisation.) Email Phone number	We need this information to be able to contact you with details about the session and to ensure that you are eligible for a place on the course. <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 and to ensure we only accept referrals from organisations that have an agreement with us.	5 years after the Information Session takes place (even if you cancel your booking).
Enrolment – You must complete an enrolment form if you wish to join a TLC-W course.	Name Funding organisation (This may be your GP	1) We need your contact information to contact you about the course sessions and send you	5 years after the end of the course you enrolled onto.

	<p>surgery, employer or other organisation.)</p> <p>Email</p> <p>Phone number</p> <p>Address</p> <p>Gender</p> <p>Date of birth</p> <p>NHS number</p> <p>Ethnicity</p> <p>Details about you and relevant information about your health measurements and medication</p>	<p>course materials. (2) We use your funding organisation 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.</p> <p><u>Lawful basis:</u></p> <p>(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.</p> <p>(2) & (3) Your explicit consent.</p>	
<p>PHC mailing list – on enrolment, you will be asked if you want to join the mailing list for our charity Public Health Collaboration.</p>	<p>Name</p> <p>Email</p>	<p>To send you updates from the TLC-W community and details of our monthly catch-up sessions and ongoing support.</p> <p><u>Lawful basis:</u></p> <p>Your consent.</p>	<p>We will keep your personal data for this purpose for as long as you continue to consent to receiving emails from us. You can unsubscribe from the TLC-W mailing list at any time by clicking the unsubscribe button at the bottom of the emails.</p>
<p>During the course – we we may only obtain these directly from you.</p>	<p>NHS number</p> <p>And we may collect other relevant measurements such as</p> <p>HbA1c</p> <p>Total cholesterol</p> <p>LDL cholesterol</p>	<p>We use these details to track the changes in your health during the course.</p> <p><u>Lawful basis:</u></p> <p>Your explicit consent.</p>	<p>5 years after the end of the course you enrolled onto.</p>

	HDL cholesterol Triglycerides Liver function test results Kidney function test results QRISK score and medication		
After the course – we may occasionally contact you and request up to date information on your health for up to 5 years. Participation in this is optional and you can opt out of being contacted at any time.	Details about your health measurements and medication. You may wish to share other improvements in your health you have noticed since starting the course.	We use this information to assess the effectiveness of the course. <u>Lawful basis:</u> Your explicit consent.	5 years after you completed the course.
On-going support – WhatsApp group - during the course you will be invited to join a closed WhatsApp group with other participants from your class. This will be created by your health 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. If you have any queries about WhatsApp please refer to their WhatsApp privacy policy.
On-going support – PHC catch up sessions (virtual). Our catch-up sessions 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 are loaded onto an unlisted YouTube channel managed by the Public Health Collaboration.	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.	Information will be kept for as long as there is a need to do so.

		(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 for your image and voice to be recorded and used in this way.	
<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.</p> <p>Our services do not involve making any automated decisions about you.</p> <p>How is your data stored?</p> <p>Your data is held within the UK and not transferred to any other country except when we post the PHC catch-up sessions on Youtube (see Google's privacy notice here https://policies.google.com/privacy?hl=en#intro) and when we transfer your email address to WordPress to assist us in sending mailings to you (see WordPress's privacy notice here: https://en-gb.wordpress.org/about/privacy/)</p> <p>Sharing information with other organisations</p> <p>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:</p> <ul style="list-style-type: none"> • Service providers who process your personal data on our behalf. These include our health coaches, software providers such as Whatsapp (see above) and Microsoft, IT support from AzTech IT and X-PERT Health who provides us with various reports on an individual's progress over the course. • We may also share anonymised information with organisations who fund our courses or that help plan local health and care. Personal identifiers (such as your name and email) are removed before sharing. <p>Anonymised Data</p> <p>After the retention period has expired, TLC-W 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..</p>			

Liberate

Liberate is an 8-week course with 1 year weekly support for those feeling addicted to ultraprocessed foods. The following section explains how and why we process your personal data when you participate in Liberate.

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
Enrolment – You must complete an enrolment form if you wish to join a Liberate course.	Name GP surgery name Email Phone number Postcode Sex Date of birth Ethnicity Details about you such as height and weight, and relevant information about your eating habits and relationship with ultraprocessed food. We also collect information on your behaviour, thoughts and emotional states about food and mental wellbeing.	(1) We need your contact information to contact you about the course sessions and send you course materials. (2) We use your sex, date of birth, health, thoughts and behaviours about food and ethnicity information as a baseline measurement to track the changes in your health during the course and to identify health trends across ages, sex and ethnicities. (3) 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.
Liberate mailing list – on enrolment, you will be asked if you want to join our mailing list	Name Email	To send you updates from the Liberate community and details of our weekly catch-up sessions. <u>Lawful basis:</u> Your consent.	We will keep your personal data for this purpose for as long as you continue to consent to receiving emails from us. You can unsubscribe from the Liberate mailing list at any time by clicking the unsubscribe button at the bottom of the Liberate emails.

<p>After the course – we may occasionally contact you and request up to date information on your health for up to 5 years. Participation in this is optional and you can opt out of being contacted at any time.</p>	<p>Details about your health measurements and wellbeing. You may wish to share other improvements in your health you have noticed since starting the course.</p>	<p>We use this information to assess the effectiveness of the course.</p> <p><u>Lawful basis:</u> Your explicit consent.</p>	<p>5 years after you completed the course.</p>
<p>On-going support – WhatsApp group - during the course you will be invited to join a closed WhatsApp group with other participants from your class. This will be created by your health coach on their phone.</p>	<p>Name Phone number Any personal data you share in the WhatsApp group</p>	<p>We use your information to provide you within on-going support.</p> <p><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).</p>	<p>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. If you have any queries about WhatsApp please refer to their WhatsApp privacy policy.</p>
<p>On-going support – Liberate catch up sessions (virtual). Our catch-up sessions 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 are loaded onto an unlisted YouTube channel managed by the Public Health Collaboration.</p>	<p>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.).</p>	<p>(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.</p> <p><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 for your image and voice to be recorded and used in this way.</p>	<p>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.

How is your data stored?

Your data is held within the UK and not transferred to any other country except when we post the TLC-W catch-up sessions on Youtube (see Google's privacy notice here <https://policies.google.com/privacy?hl=en#intro>) and when we transfer your email address to WordPress to assist us in sending mailings to you (see WordPress's privacy notice here: <https://en-gb.wordpress.org/about/privacy/>)

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 various service providers who process your personal data on our behalf. These include software providers such as Whatsapp (see above) and Microsoft, AzTech IT and our health coaches

Anonymised Data

After the retention period has expired, Liberate 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..

PHC Members

PHC offers an annual membership. The following section explains how and why we process your personal data when you become a PHC member.

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
Membership	Name Address T-shirt size Username Password	We need this information to fulfil the requirements of your membership with us including sending you a t-shirt and providing you with our newsletter, discount codes and other membership materials. <u>Lawful basis:</u> It is necessary for us to perform the contract we	1 year after your subscription has ended

		have with you to provide you with the benefits of your membership.	
Downloading and using the members mobile application	Postal / Shipping address Billing address Phone number Email address Account name	We need this information to verify your membership in order to log you into the app and to provide you with the services that come with your membership. <u>Lawful basis:</u> It is necessary for us to perform the contract with have with you to provide you with the benefits of your membership.	Until you delete the mobile application.
<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.</p> <p>Our services do not involve any automated decision making about you.</p> <p>How is your data stored? Your data is held within the UK and not transferred to any other country.</p> <p>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:</p> <ul style="list-style-type: none"> With various service providers who process your personal data on our behalf. These include software providers such as Microsoft and payment processors such as Paypal. 			

PHC Annual Conference and other event attendees

PHC runs an annual conference as well as other events throughout the year. The following section explains how and why we process your personal data when you attend one of our events.

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
Attending an event	Name Email	We need this information to issue you with a ticket to the event and to keep track of the number of	Shortly after the event has finished.

		<p>people attending our events (usually for health and safety reasons as we can only have a limited number).</p> <p><u>Lawful basis:</u> It is necessary for us to perform the contract with have with you to provide you with a ticket to our event and it is a legal requirement for us to ensure the health and safety of our attendees.</p>	
<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.</p> <p>Our services do not involve any automated decision making about you.</p> <p>How is your data stored? Your data is held within the UK and not transferred to any other country.</p> <p>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:</p> <ul style="list-style-type: none"> With various service providers who process your personal data on our behalf. These include software providers such as Microsoft, the operator of the event space and payment processors such as Paypal. 			

<u>PHC websites</u>			
PHC operates a number of websites. The following section explains how and why we process your personal data when you visit on of our websites.			
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
Signing up for a newsletter or further information	Name Email	<p>We need this information to provide you with the information you have requested.</p> <p><u>Lawful basis:</u></p>	Until such time as you unsubscribe.

		If you have requested marketing materials, our lawful basis is your consent. If you have requested other information, e.g. about diabetes management, our lawful basis is that it is necessary to process your personal data for our legitimate interest. The legitimate interest is to provide you with the information you have requested.	
<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.</p> <p>Our services do not involve any automated decision making about you.</p> <p>How is your data stored? Your data is held within the UK and not transferred to any other country.</p> <p>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:</p> <ul style="list-style-type: none"> • With various service providers who process your personal data on our behalf. 			

Low Carb Group

PHC operates a number of websites. The following section explains how and why we process your personal data when you visit on of our websites.

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
Participant in a PHC endorsed Low Carb group run by a PHC Ambassador	Full Name Email Phone number You may be asked if you wish to share details about your health and medication	(1) It is necessary for them to collect details about you to effectively manage the sessions. (2) If you share details about your health and medication, this allows the Ambassador running	5 years after the end of the course you enrolled onto.

		<p>the group to tailor information to support you fully.</p> <p>Lawful basis:</p> <p>(1) It is necessary for us to perform a legitimate interest. The legitimate interest is providing you with details how to join the group sessions.</p> <p>(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 for your image and voice to be recorded and used in this way.</p>	
<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.</p> <p>Our services do not involve any automated decision making about you.</p> <p>How is your data stored? Your data is held within the UK and not transferred to any other country.</p> <p>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:</p> <ul style="list-style-type: none"> • With various service providers who process your personal data on our behalf and with ambassadors running the sessions. 			

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

Public Health Collaboration Data Protection Officer

Address: Public Health Collaboration, c/o Reed Smith, 1 Blossom Yard, London E1 6RS

Email: sam.feltham@phcuk.org

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 can also be viewed on our website, at <https://phcuk.org/privacy-policy/>

Effective date from October 2022