

myfood24 privacy notice

1. Purpose of this notice

This notice tells you how your personal information will be collected and processed when you access and use this website or our app (this privacy policy applies equally to the myfood24 mobile application). We take your privacy very seriously and we ask you read this privacy policy carefully as it contains important information on the personal information we collect about you, what we do with your information and who your information might be shared with.

2. Who we are

This website is owned by Dietary Assessment Ltd and our registered office is at 11/75 EC Stoner Building, University of Leeds, Leeds LS2 9JT ("We" or "Us").

3. myfood24 tool

We are primarily a **data processor** for the purposes of the General Data Protection Regulation 'GDPR' (the "Legislation").

We will only be a **data controller** in respect of your personal information if you:

- are a researcher, teacher, dietitian / clinician, general practitioner (GP) or other healthcare professional (i.e. a customer of Dietary Assessment Ltd and the registered "Administrator" for your organisation's use of myfood24) and are accessing this website or our app, in which case you / your organisation will have a contract in place with Dietary Assessment Ltd.
- contact us via this website or our app through the 'Contact Us' form or via registering to use the 'Demo' facility.

For customers contracted to use myfood24, we are the data processor where you, acting in your capacity as an Administrator, are using myfood24 to collect dietary information from participants and patients ("End Users").

Each End User has a designated Administrator who will be managing a research, health or teaching project/study for such purposes as set out in the agreement between the customer and us. The Administrator will have obtained consent (the legal basis of our processing) from the individual End User to collect their dietary information. Where required, the Administrator will also have received approval for their study from the relevant ethics committee of their respective institution or similar.

Whether acting as a data processor or a data controller, we will take all reasonable steps to ensure we comply with the Legislation.

4. What Personal information is collected?

Administrator

In order to create a project/study in myfood24 you will have provided us with your name and email address and consented to us holding your personal information.

End User

Please note: An End User is not under a statutory or contractual obligation to provide personal data to us although you may have signed an end user licence agreement ("EULA") in respect of personal data that you choose to provide.

In order to have received a myfood24 invitation communication and gained access to the myfood24 tool you will have already provided your Administrator with some of your personal information (including but not limited to your name, email address and date of birth) and consented to them and to us holding and processing this personal information. Any further personal information that you are prompted to provide when using our website or our app (e.g. sex, dietary information) is optional.

If you received an invitation but you had not consented to this please contact the Administrator who originally contacted you, or if you are unable to contact them please use the contact information at the end of this privacy notice.

When using the myfood24 tool, you may be asked to provide us with personal information concerning your health i.e. a health or medical condition that you have ("Health Information"). We ask for this Health Information in order to be able to provide statistical information to health bodies including but not limited to Clinical Commissioning Groups (CCGs) and GP practices ("Health Bodies") surrounding the health conditions possessed by myfood24 End Users. This personal information will be anonymised before it is provided to any Health Bodies and therefore before these bodies are supplied with this statistical information any information that personally identifies you will be removed. If you provide us with your Health Information, you will have consented to your Administrator or to us that you are happy for us to process this personal information.

We may use your personal information to contact you whilst you are an End User in order to: communicate with you in relation to supporting your use of the myfood24 tool; inform you of any changes to the myfood24 tool; or to ask you to provide feedback on certain elements of the myfood24 tool.

We may use your personal information to produce aggregated and anonymised results for our administrative purposes; our other services; and for the purpose of ongoing development and improvement of myfood24. No personal data identifying you shall be retained within these results.

We use a third-party server to host myfood24 called, Amazon Web Services, the privacy policy of which is available here: <https://aws.amazon.com/privacy/>. Our servers are located in Dublin, Ireland.

5. Third-party access and Transfer

Your personal information that you have provided will not be sent to other third-parties unless you are first notified and give your further consent and we do not transfer it outside the EEA without your prior written consent.

6. Cookies

Cookies are small text files that are placed on your device by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

We do not use cookies to collect personal information about you. Should you wish to restrict or block cookies which are set by our website you can do this through your browser settings. The 'help' function within your browser or the manual that comes with your device should tell you how. You may also wish to visit www.aboutcookies.org which contains comprehensive information on how you can do this on a wide variety of browsers. Please be aware that restricting cookies may impact on the functionality of our website. The table below explains the cookies we use and why:

Name	Cookie Name	What's it for?	How long does it last?
Hubspot	__hs_opt_out	This Hubspot cookie is used by the opt-in privacy policy to remember not to ask the visitor to accept cookies again. It contains the string "yes" or "no".	13 months
Hubspot	__hs_initial_opt_in	This cookie is used to prevent the banner from always displaying when visitors are browsing in strict mode. It contains the string "yes" or "no".	7 days
Hubspot	__hs_do_not_track	This cookie can be set to prevent the tracking code from sending any information to HubSpot. It contains the string "yes".	13 months
Hubspot	__hssc	This cookie keeps track of sessions. This is used to determine if HubSpot should increment the session number and timestamps in the __hstc cookie. It contains the domain, viewCount (increments each pageView in a session), and session start timestamp.	30 minutes
Hubspot	__hssrc	Whenever HubSpot changes the session cookie, this cookie is also set to determine if the visitor has restarted their browser. If this cookie does not exist when HubSpot manages cookies, it is considered a new session. It contains the value "1" when present.	Session
Hubspot	hubspotutk	This cookie keeps track of a visitor's identity. It is passed to HubSpot on form	13 months

		submission and used when deduplicating contacts. It contains an opaque GUID to represent the current visitor.	
Hubspot	__hstc	The main cookie for tracking visitors. It contains the domain, utk, initial timestamp (first visit), last timestamp (last visit), current timestamp (this visit), and session number (increments for each subsequent session).	13 months
Amazon Web Services (AWS)	AWSALB, AWSALBCORS	These cookies are set when a user accesses the myfood24 web application. This cookie is used by AWS to register which server-cluster is serving the visitor. This is used in context with load balancing, in order to optimize user experience.	6 days
Cloudflare	__cfduid	This cookie is set by HubSpot's provider, Cloudflare. It helps Cloudflare detect malicious visitors to www.myfood24.org and minimizes blocking legitimate users. It may be placed on your browser to identify individual clients behind a shared IP address and apply security settings on a per-client basis. It is necessary for supporting Cloudflare's security features.	29 days
Cloudflare	__cfuid	This cookie is set by HubSpot's partner, Cloudflare. It helps with load-balancing, deliverance of website content and serving DNS connection for website operators. It expires at the end of the session.	session
Google	NID, _GRECAPTCHA	These cookies are from Google reCAPTCHA service and when signing up to myfood24 demo version and is used to stop submissions from spammers.	6 months
Google	CONSENT	Used by Google for cookie consent settings	20 years
Google	_ga, _gid, _gat,	Google Analytics is a web analytics service provided by Google, Inc.	2 years,

		<p>('Google'), to help see how www.myfood24.org website is used. Information about your interaction with www.myfood24.org website may be transmitted to Google and stored on servers in the United States. IP addresses, which can be used to identify an individual user, are anonymised by Google Analytics.</p> <p>The data collected by Google Analytics is used to analyse how frequently the same people revisit the myfood24. how myfood24.org is found (e.g. from advertising or referring websites), and which webpages are most frequently viewed. This information is combined with data from all visitors to show how myfood24.org is use. No personal identifiable information is collected.</p>	1 day, 1 minute
myfood24	Language	This is a local storage variable. It is used when users access the myfood24 web application. It contains a text string that identifies the language of myfood24 e.g. "fr" would display French.	No expiry
.facebook.com	Fr, locale, datr, sb, sfau, wd	These cookies are only set if you click on the Facebook share button or Facebook like button for a news article. For further information about these cookies go to: https://en-gb.facebook.com/policy/cookies/	3 months
.linkedin.com	UserMatchHistory, bcookie, lang, lidc	These cookies are only set if you click on the LinkedIn share button for a news article. For further information about these cookies go to: https://www.linkedin.com/legal/cookie-table	1 month
Twitter	_twitter_sess, Guest_id	These cookies are only set if you click on the Twitter share button for a news article. These cookies are used to identify you to Twitter, if you do not have a Twitter account or never accessed	Session, 2 years

		the Twitter.com website directly then Twitter will assign you a unique code to track your visit to the Twitter feed. For further information see: https://twitter.com/privacy	
Twitter	Personalization_id, Ct0	These cookies are only set if you click on the Twitter share button for a news article.it is used for Twitter’s integration and sharing capabilities for the social media. For further information see https://twitter.com/privacy	2 years, session

7. Automated collection of personal information

As with most other web servers, when you access these web pages certain information you provide will automatically be recorded. This will include your IP address, browser type, and information relating to the page you last visited. This information is processed to estimate how much usage of the server is made by different categories of users and in the event of a breach of security may be used to aid detection.

8. Opting out (withdrawing consent)

If you no longer wish to participate in the research, health or teaching project/study you may opt out by contacting the Administrator in charge of the project/study or by choosing the relevant option in this website (located at the bottom of the help section). If you are part of a research study, you may opt out but allow your personal information provided to date to remain in the system and still be used in the study/project or you may opt out and request that your information is not used in the study/project.

9. Changes to this notice

This notice and therefore the ways in which your personal information may be processed can be changed from time to time. Any changes will only be notified via this web page.

10. Your rights as a data subject

Under the Legislation you have the right to:

- withdraw consent;
- access your personal data that we process;
- rectify inaccuracies in personal data that we hold about you;
- be forgotten, that is your details to be removed from systems that we use to process your personal data;
- restrict the processing in certain ways (we are permitted to store the personal data, but not use it);
- obtain a copy of your data in a commonly used electronic form; and
- object to certain processing of your personal data by us:

- processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority
- direct marketing
- processing for purposes of scientific/historical research and statistics

Please see <https://ico.org.uk/> for further information on the above rights. You may also contact the Data Protection contact below for further information.

You have a right to complain to the following supervisory authorities about the way in which we process your personal data:

http://ec.europa.eu/newsroom/article29/document.cfm?action=display&doc_id=50061

11. Retention periods

Administrator

On expiry of your licence to use myfood24, your account will be made inactive, but your name, email address and work organisation will be kept for a period of 6 years from the expiry of your licence for HMRC purposes.

End User

Administrators are responsible for the deletion of End User name and email addresses on completion of the project/study and before the expiry of your licence (when access to the myfood24 tool will cease). In any event, even if the Administrator fails to delete the End User personally identifiable data, it will be deleted by the myfood24 system after a maximum of six years from the expiry of your licence.

12. Further information and Contact

As part of our UKAS certified ISO 27001 programme we have completed a data classification exercise. As we do not process any special categories of data (as defined by the General Data Protection Regulation (EU) 2016/679 (GDPR)) we are not required to have a Data Protection Officer. However, in order to provide support and oversight of personally identifiable information (PII) held on our systems, we have a Data Protection Office, which consists of stakeholders from across the business and external information security and privacy experts.

If you have any queries relating to this privacy notice or the way your personal information is being processed through this website or our app then please contact the Administrator who originally granted you access to this website or our app, or if you are unable to contact them please contact our data protection contact: dataprotection@myfood24.org

Our general enquiry email is: enquiries@myfood24.org.

Our postal address is: Dietary Assessment Ltd.
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