




Crystal Health Group

Client Privacy Policy

	Crystal Health Group Client Privacy Policy		
	Version	Approval Date	Review Date
	v02.04.18	April 2018	April 2020

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1. Purpose

We are committed to safeguarding the privacy of our clients. This policy applies where we are acting as a data controller with respect to the personal data of our clients; in other words, where we determine the purposes and means of the processing of that personal data. We will ask you to consent to our use of cookies in accordance with the terms of this policy when you first visit our website. In this policy, “we”, “us” and “our” refer to Crystal Health Group Limited or DNA Clinics Limited.

2. Scope

This SOP relates to all clients of Crystal Health Group Limited or DNA Clinics Limited.

3. Responsible Person(s)

The Policy Author is responsible for:

- Accuracy, version control and review dates.
- Implementation, training and operational compliance of this Policy.
- Initiating Policy change requests.


The QA representative is responsible for:

- Ensuring adherence to company Policy standards for authoring, content and structure.
- Resolution of Quality Incident reports arising from noncompliance of this Policy or external complaints.

Trained personnel are responsible for complying with all aspects of this Policy.

4. Health & Safety

All tasks and activities associated with this Policy comply with Crystal Health Group’s Health & Safety Policy.

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5.1 How we use your personal data

In this section, we have set out:

1. the general categories of personal data that we may process;
2. In the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
3. the purposes for which we may process personal data; and
4. the legal bases of the processing.

Usage Data

We may process data about your use of our website and services. The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is Google Analytics, Google Search Console, Shopify ecommerce platform and Wordpress plug-ins. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.

Account Data

We may process your account data. The account data may include your name and email address. The source of the account data is you, your employer or authorised third party representative. The account data may be processed for the purposes of providing our services, ensuring the security of our services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is consent OR our legitimate interests, namely the proper administration of our business OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.


Service Data

We may process your personal data that are provided in the course of the use of our services. The service data may include:

- Names of individuals
- Dates of birth
- Telephone numbers
- Email addresses
- Postal Addresses
- Passport numbers
- Driver numbers
- National Insurance numbers
- Other forms of identification and associated numbers
- Current medication
- Ethnic background
- Payment details

The source of the service data is you, your employer or authorised third party representative. The service data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is consent OR our legitimate interests, namely the proper administration of our website and business OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

Service data is collected via means of version controlled documentation by employees of Crystal Health Group Limited or approved and authorised contractors. At this point, written consent is obtained by you to fulfil the service requested. Please refer to section 7 for your rights on withdrawing consent.

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Publication Data

We may process information that you post for publication on our website or through our services e.g. client feedback. The publication data may be processed for the purposes of enabling such publication and administering our website and services. The legal basis for this processing is consent OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract OR at the request of your employer for statistical analysis purposes.

Enquiry Data

We may process information contained in any enquiry you submit to us regarding goods and/or services. The enquiry data may be processed for the purposes of offering, marketing and selling relevant goods and/or services to you. The legal basis for this processing is consent OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

Transaction Data

We may process information relating to transactions, including purchases of goods and services, that you enter into with us and/or through our website. The transaction data may include your contact details, your card details and the transaction details. The transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely our interest in the proper administration of our website and business.

Correspondence Data

We may process information contained in or relating to any communication that you send to us. The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

Other Data


We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.

In addition to the specific purposes for which we may process your personal data set out in this section, we may also process any of your personal data where such processing is necessary, for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. Please do not supply any other person's personal data to us, unless we prompt you to do so.

5.2 Providing your personal data to others

We may disclose your personal data to any member of our group of companies including (this means DNA Clinics Limited) insofar as reasonably necessary for the purposes, and on the legal bases, set out in this policy. We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

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We may disclose **Service data** to our suppliers or subcontractors; Eurofins Forensic Services, Cansford Laboratories and Northgene, insofar as reasonably necessary to fulfil the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

Financial transactions relating to our website and services are handled by our payment services providers, Worldpay and PayPal. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. You can find information about the payment services providers' privacy policies and practices at <https://www.worldpay.com/uk/privacy-policy> and <https://www.paypal.com/uk/webapps/mpp/ua/privacy-prev>.

In addition to the specific disclosures of personal data set out in this section, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

In specific circumstances, you may also grant third party consent. This will provide authorisation for us to share your personal data with your nominated third party. Please refer to the Third Party Consent diagram at the end of this policy for detailed information regarding the request process.

5.3 International transfers of your personal data

In this section, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA).

We have offices and facilities in the United Kingdom. The European Commission has made an "adequacy decision" with respect to the data protection laws of the United Kingdom. Transfers will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the Information Commissioner's Office, a copy of which can be obtained from <https://ico.org.uk/for-organisations/guidance-index/data-protection-and-privacy-and-electronic-communications/>

The hosting facilities for our website are situated in the USA. The European Commission has made an "adequacy decision" with respect to the data protection laws of this country. Transfers will be protected by appropriate safeguards, namely [the use of standard data protection clauses adopted or approved by the European Commission, a copy of which you can obtain from https://ec.europa.eu/info/law/law-topic/data-protection_en


You acknowledge that personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

5.4 Retaining and deleting personal data

This section sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

All retention times for all Crystal Health Group services are detailed in our archive policy. Please call 0800 988 7107 to request details regarding retention times for your specific test with Crystal Health Group.

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Notwithstanding the other provisions of this section, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

5.5 Amendments

We may update this policy from time to time by publishing a new version on our website.

You should check this page occasionally to ensure you are happy with any changes to this policy.

We may notify you of changes to this policy [by email or through the private messaging system on our website].

5.6 Your rights

In this section, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

Your principal rights under data protection law are:

1. the right to access;
2. the right to rectification;
3. the right to erasure;
4. the right to restrict processing;
5. the right to object to processing;
6. the right to data portability;
7. the right to complain to a supervisory authority; and
8. the right to withdraw consent.


You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a £10.00 fee per request. This does not include the provision of requests for additional test reports, which are subject to a £10.00 administration fee per request. You can access your personal data by visiting <https://www.crystal-health.co.uk/subject-access-request> and completing the subject access request form. We will comply with your subject access request within 30 days.

You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include:

1. the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; (please refer to the Archive Policy for restrictions on this).
2. you withdraw consent to consent-based processing; (administration fees may apply)
3. you object to the processing under certain rules of applicable data protection law;
4. the processing is for direct marketing purposes;
5. the personal data have been unlawfully processed.

However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary:

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1. for compliance with a legal obligation;
2. for the establishment, exercise or defence of legal claims.

In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are:

1. you contest the accuracy of the personal data;
2. processing is unlawful but you oppose erasure;
3. we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims;
4. you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it:
 - with your consent;
 - for the establishment, exercise or defence of legal claims;
 - for the protection of the rights of another natural or legal person; or for reasons of important public interest.

You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

To the extent that the legal basis for our processing of your personal data is:


1. consent; or
2. that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract,

and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time (administration fees may apply). Withdrawal will not affect the lawfulness of processing before the withdrawal.

To withdraw your consent, you must inform Crystal Health Group as soon as possible on 0800 988 7107 or 0161 359 4187. You will then be instructed to provide a written request to officially withdraw your consent. You may be asked to supply appropriate evidence of your identity before the request can be processed. In addition, further authorisation from your solicitor or employer may have to be obtained.

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You may exercise any of your rights in relation to your personal data by written notice to us to:

FAO: Quality Assurance
Crystal Health Group
The Old Chapel
53 Peel Street
Manchester M30 0NG

5.7 About cookies

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies may be either “persistent” cookies or “session” cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

Cookies that we use

We use cookies for the following purposes:

Authentication - we use cookies to identify you when you visit our website and as you navigate our website.

Analysis - we use cookies [to help us to analyse the use and performance of our website and services. See ‘Cookies used by our service providers’ below.

Cookie consent - we use cookies to store your preferences in relation to the use of cookies more generally.

Cookies used by our service providers

Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google’s privacy policy is available at: <https://www.google.com/policies/privacy/>. The relevant cookies are: [identify cookies].]


Managing cookies

Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- <https://support.apple.com/kb/PH21411> (Safari); and
- <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

Blocking all cookies will have a negative impact upon the usability of many websites.

If you block cookies, you will not be able to use all the features on our website.

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5.8 Our details

Crystal Health Group Limited is registered in England and Wales under registration number 10804496, and our registered office is at 298 St. Mary's Road, Garston, Liverpool, Merseyside L19 0NQ. Crystal Health Group Limited is registered under the Data Protection Act 1998 Registration No. ZA260675.

DNA Clinics Limited is registered in England and Wales under registration number 07687684, and our registered office is at 298 St. Mary's Road, Garston, Liverpool, Merseyside L19 0NQ. DNA Clinics Limited is registered under the Data Protection Act 1998 Registration No. ZA260357.

Our principal place of business is at The Old Chapel, 53 Peel Street, Manchester M30 0NG.


You can contact us:

1. by post, to the postal address given above;
2. using our website contact form;
3. by telephone, on 0800 988 7107 / 0161 359 4187; or
4. by email, using info@crystal-health.co.uk

5.9 Data protection officer

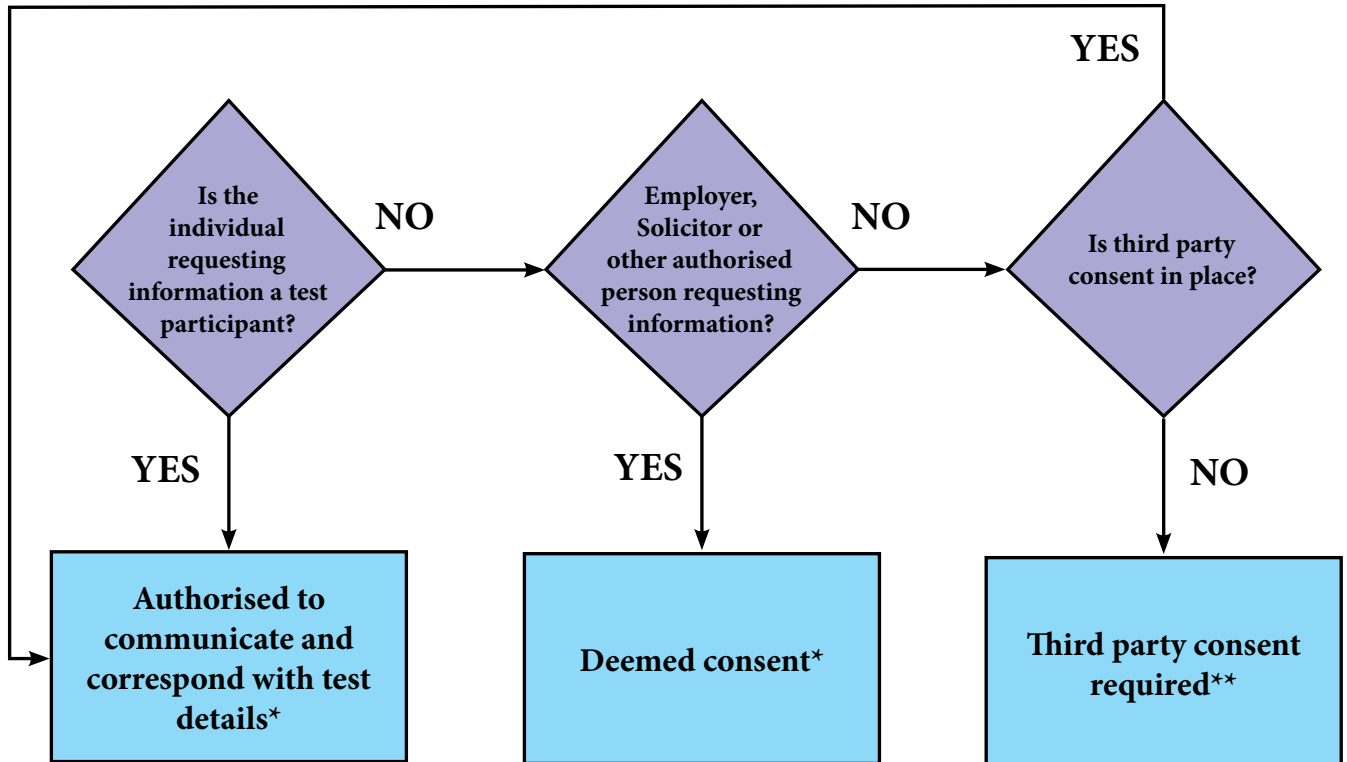
Our data protection officer's contact details are:

FAO: Compliance Manager
Crystal Health Group
The Old Chapel
53 Peel Street
Manchester M30 0NG

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5.10 Third Party Consent

The process diagram illustrates the procedure for obtaining third party consent for Crystal Health Group Test Cases. This is with the exception of tests that are ordered for individuals by their employer, solicitor or other authorised body.



*** Dependant on providing correct responses to security questions.**

**** If a 'Third Party' form is required to be sent, then a £10 administration must be charged. This will generally only be the case if an appointment based collection has taken place and the client failed to mention a third party. Or, for a self-collecion DNA kit, when there is no option to add a third party as they are for personal information only.**

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6. Version Control


It is the responsibility of each person to ensure they adhere to this policy. It is the responsibility of the Operations Manager to maintain and implement this policy.

Previous Version	Changes	Last Effective Date
v.01.06.17	<ul style="list-style-type: none">Complete review and update to comply with GDPR requirements.	27/04/2018

7. Authorisation

Name Nichola Lawton Position Director

Signed  Date 27/04/2018

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