

1. General Policy Statement

Vital Life Solutions recognises the legal requirements of the General Data Protection Regulation (GDPR) and is committed to safeguarding personal data.

In particular:

- Personal data will be processed fairly, lawfully and in a transparent manner and will not be processed unless –
 - a) at least one of the conditions set out in Section 2 below is met, and
 - b) in the case of special category data, at least one of the conditions in Section 3 below is also met.
- Personal data will be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- Personal data will be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- Personal data shall be accurate and, where necessary, kept up to date.
- Personal data processed for any purpose(s) will be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
- Personal data will be processed in a manner that ensures appropriate security of the personal data.
- Vital Life Solutions Ltd will remain responsible and accountable for all personal data collected.

2. Conditions For Processing Personal Data

Unless a relevant exemption applies, at least one of the following conditions must be met whenever we process personal data:

- a) The individual has consented to the processing of their personal data.
- b) The processing is necessary in relation to a contract which the individual has entered into; or because the individual has asked for something to be done so they can enter into a contract.
 - The processing is necessary because of a legal obligation that applies to you (except an obligation imposed by a contract).
 - The processing is necessary to protect the individual's "vital interests". This condition only applies in cases of life or death, such as where an individual's medical history is disclosed to a hospital's A&E department treating them after a serious road accident.
 - The processing is necessary for administering justice, or for exercising statutory, governmental, or other public functions.
 - The processing is in accordance with the "legitimate interests" condition.

3. Conditions For Processing Special Category Data

At least one of the additional conditions listed below must also be met whenever we process special category data:

- a) The individual has consented explicitly to the processing of their special category data.
- b) The processing is necessary to comply with employment law.
- c) The processing is necessary to protect the vital interests of:

the individual (in a case where the individual's consent cannot be given or reasonably obtained), or

- another person (in a case where the individual's consent has been unreasonably withheld).
- The processing is carried out by a not-for-profit organisation and does not involve disclosing personal data to a third party, unless the individual consents. Extra limitations apply to this condition.
- The individual has deliberately made the information public.
- The processing is necessary in relation to legal proceedings; for obtaining legal advice; or otherwise for establishing, exercising or defending legal rights.
- The processing is necessary for administering justice, or for exercising statutory or governmental functions. The processing is necessary for medical purposes and is undertaken by a health professional or by someone who is subject to an equivalent duty of confidentiality.
- The processing is necessary for monitoring equality of opportunity and is carried out with appropriate safeguards for the rights of individuals.

In addition to the above conditions – which are all set out in the GDPR itself – regulations set out several other conditions for processing special category data. Their effect is to permit the processing of special category data for a range of other purposes – typically those that are in the substantial public interest, and which must necessarily be carried out without the explicit consent of the individual.

Examples of such purposes include preventing or detecting crime and protecting the public against malpractice or maladministration.