

# The Glucose Never Lies Ltd — GDPR & Data Protection Statement (2025)

Company Name: The Glucose Never Lies Ltd

Company Number: 14836217

Registered Office: Birmingham, United Kingdom

**Data Controller:** John Stuart Pemberton **Contact:** john@theglucoseneverlies.com

# 1. Purpose and Scope

This statement sets out how *The Glucose Never Lies Ltd* ("we", "us", "our") collects, stores, and uses information in line with the UK General Data Protection Regulation (UK-GDPR) and the Data Protection Act 2018.

It applies to everyone who interacts with our website, educational courses, podcast, media content, consultancy, or research activities.

### 2. Our Commitment

We are an evidence-led education and media platform translating diabetes science into clear, practical learning for people with type 1 diabetes and the professionals who support them.

We value transparency, accuracy, and respect for privacy. We will never sell, trade, or misuse any data collected through our platforms.

## 3. Information We Collect

We may collect the following types of information:

- **Anonymised analytics data** (via Google Analytics 4) to understand site performance.
- Contact information you choose to provide, such as name, email address, or message content when you contact us.
- **Professional details** if you enrol in GNL courses, events, or consultancy programmes.
- **Media or consent materials** only where you voluntarily provide them (e.g. interviews, podcast participation).



We do not collect special-category medical data through our website unless you explicitly provide it in correspondence, and such information is stored securely and used solely for the purpose intended.

# 4. Lawful Basis for Processing

We process data under the following lawful bases:

- **Legitimate interests:** to operate and improve our website, educational content, and audience understanding through anonymised analytics.
- Contract: to deliver consultancy, training, or course enrolments that you request.
- **Consent:** when you choose to receive newsletters, submit contact forms, or participate in media projects.

#### 5. Data Retention

- Anonymised Google Analytics data is retained for up to 26 months in line with Google's standard retention period and is automatically deleted thereafter.
- Contact-form and consultancy correspondence are retained for no longer than 24 months after the completion of your enquiry or project, unless required for professional record-keeping or legal obligations.
- Newsletter or mailing-list data is kept until you unsubscribe.

### 6. Sharing and Security

We do not sell or share personal data with third-party advertisers.

Data may be processed by trusted providers who act as Data Processors (e.g. Google Analytics, Mailerlite, Riverside, Buzzsprout, or Cloudflare) under formal data-processing agreements consistent with UK-GDPR.

All systems use encrypted connections (HTTPS / SSL).

Access is restricted to authorised members of the GNL team.

# 7. International Transfers



Where data is processed outside the UK (for example by Google or Mailerlite servers), we rely on the UK's adequacy framework and standard contractual clauses to ensure equivalent data-protection safeguards.

#### 8. Children's Data

Our website and educational resources are designed for a general audience and are not intended to collect personal data from children.

If a child under 16 provides information by mistake, please contact us and we will remove it immediately.

# 9. Your Rights

Under UK-GDPR, you have the right to:

- Access the personal data we hold about you.
- Request correction or deletion of your data.
- Withdraw consent for communications at any time.
- Restrict or object to processing where applicable.
   To exercise these rights, contact john@theglucoseneverlies.com.

If you believe your data has been mishandled, you may also raise a concern with the Information Commissioner's Office (ICO) at <a href="https://www.ico.org.uk">www.ico.org.uk</a>.

### 10. Cookies and Analytics

Our website uses Google Analytics 4 with IP anonymisation enabled. No advertising features or cross-site tracking cookies are used. Analytics data helps us see which pages are useful so we can improve educational content. You can block analytics cookies in your browser settings without affecting access to the site.

## 11. Data Breach Procedure

If a personal-data breach occurs, we will:

1. Identify and contain the breach immediately.



- 2. Assess the risk to individuals.
- 3. Notify the ICO within 72 hours if required.
- 4. Notify affected individuals without undue delay if their rights or freedoms are at risk.

# 12. Review and Updates

This statement is reviewed annually or sooner if regulations change.

Last reviewed: October 2025.

### 13. Contact

For all privacy or data-protection enquiries:

John Pemberton — Data Controller

john@theglucoseneverlies.com

# 14. Closing Statement

The Glucose Never Lies Ltd operates on the principle that accuracy, transparency, and respect for privacy are central to trust.

If you ever believe your data has been handled incorrectly, contact us immediately — we will investigate and respond within 14 days.