

Ideal Carehomes Ltd

Privacy Policy

1. INTRODUCTION AND WHO WE ARE

- 01.1. Welcome to Ideal Carehomes Ltd.'s privacy policy.
- 01.2. Ideal Carehomes Ltd together with any group companies ("**we**" "**us**" "**our**") are committed to protecting and respecting your privacy.
- 01.3. For the purposes of data protection legislation, we are the controller of your personal data, and we will process your personal data in accordance with the retained EU law version of the General Data Protection Regulation (EU) 2016/679 ("**UK GDPR**") and the Data Protection Act 2018 ("**DPA**").
- 01.4. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

2. HOW WE COLLECT INFORMATION

VISITORS TO OUR WEBSITE

- 02.1. We may collect and process personal data about you in the following circumstances:
 - 02.1.1. When you complete forms on our website ("**Site**"). This includes your name, email address, contact telephone number which is provided at the time of registering to use our Site, subscribing to our services, and requesting further services;
 - 02.1.2. Whenever you provide information to us when reporting a problem with our Site, making a complaint, making an enquiry or contacting us for any other reason. If you contact us, we may keep a record of that correspondence;
 - 02.1.3. Details of your visits to our Site including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise, and the resources that you access (see paragraph 2.2.2 on Cookies below); and
 - 02.1.4. Whenever you disclose your information to us, or we collect information from you in any other way, through our Site and live chat facility.
- 02.2. We may also collect personal data in the following ways:
 - 02.2.1. IP Address: We may collect information about your device, including where available your Internet Protocol ("**IP**") address, for reasons of fraud protection. We may also collect information about your device's operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns and does not identify any individual.
 - 02.2.2. Cookies: Our Site uses Cookies to distinguish you from other users of our Site. This helps us to provide you with a good experience when you browse our Site and also allows us to improve our Site. For detailed information on the Cookies we use and the purposes for which we use them see our Cookies Policy at: <https://idealcarehomes.co.uk/cookiepolicy>.
 - 02.2.3. Website Links: Our Site may, from time to time, contain links to and from the websites of third parties. Please note that if you follow a link to any of these websites, such websites will apply different terms to the collection and privacy of your personal data, and we do not accept any responsibility or

liability for these policies. Please check before you submit your information to these websites.

3. RESIDENTS & CUSTOMERS

- 03.1. We process two categories of personal information about you and (where this applies) your next of kin:
 - 03.1.1. Standard personal data (for example, information we use to contact you, identify you or manage our relationship with you); and
 - 03.1.2. Special category personal data (for example, health information, information about your race, ethnic origin, religion, that allows us to tailor your care.)
- 03.2. To ensure we can process your application for care and support services, and to fulfil our contract with you to provide care services, we will collect the following information by email, facsimile, post, telephone (we may also record the conversation), and if you complete a pre-admission assessment form:
 - 03.2.1. Your name, address, contact details, date of birth and next of kin information;
 - 03.2.2. Your capacity to make decisions and/or whether we need to liaise with the person(s) you have entrusted with power of attorney;
 - 03.2.3. Any specific health issues that you may be required to disclose, depending on the nature of the care we will be providing you;
 - 03.2.4. Details relating to the methods through which your care is being funded. If you are funding your care, then we will take payment through direct debit. If your care is being funded, then we will deal with the organisation funding this, or any other party that you have nominated or has agreed to pay for your care;
 - 03.2.5. We will record details of any medication you require in order that we can ensure we administer this, and we will also record any specific medical wishes you have; and
 - 03.2.6. We will record other information such as your religion to allow us, at your request, to contact the appropriate religious representative.
- 03.3. We will use this information to process your application and comply with our contractual obligations.
- 03.4. In order to perform our contract with you, we may also need to share personal data with third parties such as medical professionals, social services, mental health services, funding services such as relatives or local authorities, government services as required by law or order, service providers such as hairdressers and chiropodists, and payment providers to enable us to process your payments.
- 03.5. We may also advertise your feedback and share your images on our website and marketing materials (subject to obtaining your prior consent where necessary).
- 03.6. If you are the next of kin or person with power of attorney, then your details are required to ensure that we can get the necessary authority in respect of the care services we are providing to the person under your authority.
- 03.7. We will retain your information as long as we have a contractual obligation with you, and for a period of 7 years afterwards, subject to an annual review. Where you have subscribed to

receive marketing correspondence from us we will keep personal data until you unsubscribe from receiving such correspondence from us.

- 03.8. We process special category personal data in order to ensure that we can provide safeguarding and other care to you as an individual; to ensure that we can protect our staff and other residents; and to make an assessment of whether we are able to provide the care you need, including aspects of your care needs such as medical, physical, psychological, and mental wellbeing.

4. VISITORS TO OUR SITES

We will collect details of your car registration number for the purpose of enforcing parking restrictions and ensuring the security of our sites. We do this on the basis of our (and our visitors') legitimate interests in operating safe and secure car parking at our sites.

5. SUPPLIERS

We will collect supplier details such as your name, email address, contact telephone number, address, bank details in order to contact you about goods or services ordered with you and to place further orders. We will keep the personal data for 7 years further to being provided with the goods/services, subject to an annual review.

6. HOW WE USE YOUR INFORMATION

LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

- 06.1. In accordance with data protection legislation, we are required to notify you of the legal basis upon which we process your personal data. We process your personal data for the following reasons:

- 06.1.1. for performance of a contract that we enter into with you;
- 06.1.2. where necessary for compliance with a legal obligation we are subject to; and/or standards such as those regulated and inspected by the Care Quality Commission; and
- 06.1.3. for our legitimate interests (as described within this policy).

LEGITIMATE INTERESTS

- 06.2. We may use your personal data for the legitimate interests of Ideal Carehomes Ltd., to the extent permissible by law in order to:

- 06.2.1. provide you with care services or information that you requested from us;
- 06.2.2. perform obligations of contract to which you are party;
- 06.2.3. fulfil any legal obligations we are subject to;
- 06.2.4. allow you to participate in interactive features of our Site, when you choose to do so;
- 06.2.5. ensure that content from our Site is presented in the most effective manner for you and for your device;
- 06.2.6. improve our Site and services;
- 06.2.7. process and deal with any complaints or enquiries made by you; and

- 06.2.8. contact you for marketing purposes where you have signed up for these (see paragraph 6 for further details).

AUTOMATED PROCESSING

- 06.3. We do not undertake automated decision making with your personal data.

7. MARKETING

- 07.1. In addition to the uses described in paragraphs 2-4 above, we may use personal data for our legitimate interests in order to provide you with details about our care services, business updates and events which we think may be of interest.
- 07.2. If you are not an existing customer but you invite us to provide information about our care services, we may collect your name, address, email address, and contact telephone number for the purposes of providing you with information about our care services or newsletters. We will retain such data for a period of 3 years from the point at which you provide us with your data, unless you place an order with us in which case, the terms at paragraph 3 above will apply.
- 07.3. You have the right to opt-out of receiving the information detailed in paragraph 6.1 at any time. To opt-out of receiving such information you can:
- 07.3.1. tick the relevant box situated in the form on which we collect your information;
 - 07.3.2. clicking the unsubscribe button contained in any such communication received; or
 - 07.3.3. email us at dataprotection@idealcarehomes.co.uk providing us with your name and contact details.

8. SHARING YOUR INFORMATION WITH THIRD PARTIES

- 08.1. We may disclose your information to third parties for the following legitimate interests:
- 08.1.1. to staff members and medical providers, in order to facilitate the provision of care services to you; and in the event you are taken ill;
 - 08.1.2. to other members of the public, where your condition may represent a threat to the interests, rights and freedoms of other people, e.g., if you have a communicable disease and we believe your condition may represent a risk to other residents;
 - 08.1.3. to our affiliated entities to support internal administration;
 - 08.1.4. IT software providers that host our website and store data on our behalf; and/or
 - 08.1.5. to a prospective buyer of some or all of our business or assets, in which case personal data including personal data will also be one of the transferred assets.
- 08.2. We may disclose personal data to the police, regulatory bodies, legal advisors or similar third parties where we are under a legal duty to disclose or share personal data in order to comply with any legal obligation, or in order to enforce or apply our website terms and conditions and other agreements; or to protect our rights, property, or safety of our customers, or others. This

includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

08.3. We will not sell or distribute personal data to other organisations without your prior approval.

9. TRANSFERS OUTSIDE OF THE EUROPEAN ECONOMIC AREA

We will not transfer your personal data outside the UK or the European Economic Area (“EEA”).

10. SECURITY AND STORAGE OF INFORMATION

010.1. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

010.2. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your information transmitted to our Site; any transmission is at your own risk.

010.3. Information you provide to us is shared on our secure servers. We have implemented appropriate physical, technical and organisational measures designed to secure your information against accidental loss and unauthorised access, use, alteration or disclosure. In addition, we limit access to personal data to those employees, agents, contractors and other third parties that have a legitimate business need for such access.

11. YOUR INFORMATION AND YOUR RIGHTS

011.1. Data protection legislation gives you the right to object to the processing of your personal data in certain circumstances or withdraw your consent to the processing of your personal data where this has been provided.

011.2. You also have the right to access information held about you and for this to be provided in an intelligible form. If you would like a copy of some or all of your personal information, please send an email to dataprotection@idealcarehomes.co.uk. In certain circumstances we reserve the right to charge a reasonable fee to comply with your request.

011.3. You can also ask us to undertake the following:

011.3.1. update or amend your personal data if you feel this is inaccurate;

011.3.2. remove your personal data from our database entirely;

011.3.3. send you copies of your personal data in a commonly used format and transfer your information to another entity where you have supplied this to us, and we process this electronically with your consent or where necessary for the performance of a contract; or

011.3.4. restrict the use of your personal data.

011.4. We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the personal data that we hold about you or make your requested changes.

011.5. Data protection legislation may allow or require us to refuse to provide you with access to some or all the personal data that we hold about you or to comply with any requests made in accordance with your rights referred to above. If we cannot provide you with access to your personal data, or process any other request we receive, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

- 011.6. Please send any requests relating to the above to our Data Protection Officer at dataprotection@idealcarehomes.co.uk specifying your name and the action you would like us to undertake.

12. RIGHT TO WITHDRAW CONSENT

Where you have provided your consent to the collection, processing and transfer of your personal data, you have the legal right to withdraw your consent under certain circumstances. To withdraw your consent, if applicable, please contact us at dataprotection@idealcarehomes.co.uk.

13. CONTACT US

- 013.1. We have appointed a Data Protection Officer to oversee compliance with this privacy policy. If you have any questions, comments or requests regarding this policy or how we use your personal data please contact our Data Protection Officer at dataprotection@idealcarehomes.co.uk.
- 013.2. This is in addition to your right to contact the Information Commissioners Office if you are unsatisfied with our response to any issues you raise at <https://ico.org.uk/global/contact-us/>

14. CHANGES TO OUR PRIVACY POLICY

- 014.1. We keep our privacy policy under regular review and will notify you if there are any changes to our privacy policy that materially affect how we collect, store, or process your personal data. This version was last updated on June 2023.
- 014.2. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.