

OUR PRIVACY POLICY

This document explains how we use your personal data

Our commitment to you

We are committed to ensuring the privacy of our care receivers, care referrer's, professional contacts, potential employees and other website visitors. In this policy we explain how we hold, process and retain your personal data.

Sequence Care Limited is the data controller in respect to all personal data collected on this website www.sequencecaregroup.co.uk the ("**website**").

1. How we use your personal data

1.1 This section provides you with information about:

- (a) what personal data we hold and process;
- (b) in respect of personal data that we did not collect from you directly, where we obtained that data from, and what types of data we have collected;
- (c) the purposes for which we may process your personal data; and
- (d) the legal grounds on which we process your data.

We will not pass on your information to any third party without your explicit consent.

Our care receivers and users of our services

1.2. **Contact data.** We may process information that you or your referrer provide to us ("**contact data**"). This contact data may include your name, address, telephone number, email address, date of birth, and may be provided to us in person, over the phone or through our website. We may use this contact data during the course of providing our care services, in conjunction with our partners and suppliers to you.

The legal basis for this processing is for the purposes of performing our contract with you, or in taking steps at your request prior to entering into a contract.

Where you have provided your consent for us to do so, we may contact you regarding the latest promotions and offers regarding our products and services, and those of our partner organisations, and to send you newsletters.

1.3. **Care Data.** If you become a care receiver or user of our services, we may process information that you or your referrer provide to us ("**care data**"). This care data may include your name, home address and postcode, telephone number, email address, date of birth, gender, a photograph of you, CCTV imagery and information contained within images or texts that you send us which may contain locational data, and may be provided to us in person, through one of our contact forms or through our website or the online portals that we provide.

The legal basis for this processing is for the purposes of performing our contract with you, or in taking steps at your request prior to entering into a contract.

We may also process and retain relevant information relating to your health which may include your NHS Number, notes and reports about your health, assessments made by a health professional, details of diagnosis and treatment given, information about any allergies and health conditions, results of scans, x-rays and laboratory tests, physical and mental wellbeing, details of contact we have had with you, relevant information from professional care givers and relatives, and any other important current and historical medical information for the purposes of providing our care services.

This data is a special category of personal data and we will only process it to provide you with appropriate health and social care services. The legal basis for the processing of this data is for the purposes of medical diagnosis, provision of healthcare and treatment, provision of social care and the management of healthcare systems or services or social care systems.

It is essential that the personal data you provide to us is accurate and up to date. Please inform us of any changes to personal data as soon as possible to minimize the risk of you not receiving important correspondence or other communications from us with regards to your health.

- 1.4 **Transaction and financial data.** We may process information relating to any payments made to us by you, or on your behalf ("**transaction data**"). The transaction data may include your contact details, your bank account details, and the transaction details. The transaction data may be processed for the purposes of processing these payments 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.

- 1.5 **Shared data.** We run services on behalf of other organisations such as Local Authorities, NHS, Clinical Commissioning Groups and Trusts. These services are often run under a franchise or contract agreement. Data may be shared with these organisations at a summary level but not at a personally identifiable level. For our health related services, with your consent, we may share identifiable information with your GP and NHS services.

At the end of a franchise or contract, if the service is to be run by another operator, we will forward on your details to the new operator so they can continue to provide the service to you without interruption. You may object to our sending this data by contacting us at referrals@sequencecaregroup.co.uk.

These organisations will be a Data Controller in their own rights, and where they do process your data will inform you directly or through their services such as a website about the data they hold and what processing they undertake.

Referrers to Services

- 1.6 **Contact data.** We may process information that you provide to us ("**contact data**"). This contact data may include your name, telephone number and email address, and may be provided to us in person, over the phone or through our website. We may use this contact data during the course of providing our care services to the individual you referred, in conjunction with our partners and suppliers.

The legal basis for this processing is and our legitimate interests, namely our interest in the proper administration of our website and business.

Where you have provided your consent for us to do so, we may contact you regarding the latest promotions and offers regarding our products and services, and those of our partner organisations, and to send you newsletters.

- 1.7 **Transaction data.** We may process information relating to any payments made to us by you ("**transaction data**"). The transaction data may include your contact details, your bank account

details, and the transaction details. The transaction data may be processed for the purposes of processing these payments 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.

Our Professional contacts

- 1.8 **Contact data.** We may process information that you provide to us ("**contact data**"). This contact data may include your name, telephone number, email address, employment details and professional information and may be provided to us in person, over the phone or by email. We may use this contact data during the course of our professional relationship.

The legal basis for this processing is and our legitimate interests, namely our interest in the proper administration of our business.

Where you have provided your consent for us to do so, we may contact you regarding the latest promotions and offers regarding our products and services, and those of our partner organisations, and to send you newsletters.

Potential Employees

- 1.9 **Profile data.** We may process employment information that you provide to us ("**profile data**"). This profile data may include your name, address, telephone number, email address, profile pictures, gender, date of birth, relationship status, interests and hobbies, educational details, employment history, curriculum vitae, job preferences and employment details. We will process your profile data in relation to job vacancies that you have applied for, generally processing any job applications, facilitating the recruitment process and furthering our relationship with you. The legal basis for this processing is our legitimate interests in finding an appropriate person for a particular role.

We may consider you for opportunities that you did not specifically apply for but which we think might be a good fit for your skillset. The legal basis for this processing is our legitimate interests in finding an appropriate candidate for particular roles and vacancies.

Where you have given us consent to process your information for the purposes detailed above, we will enter the profile data into our central recruitment database ("**talent pool**"). The legal basis for this is our legitimate interests in maintaining a viable talent pool.

- 1.10 **External data.** We may collect your details from third-party sources such as social media sites including Facebook and LinkedIn, job boards or similar websites, this information may include your name, email address or telephone number ("**external data**"). We may do this where we identify that you are suitable for an available vacancy. We may use the external data to contact you to ask whether you would like us to provide you with an opportunity to apply for a vacancy. Our use of the contact data in these circumstances is limited to making contact with you to determine whether you are interested in receiving our services. The legal basis for this processing is our legitimate interest as a business to maintain a viable talent pool.

Complaints

- 1.11 **Complaint data.** When we receive a complaint from a person we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint the ("**complaint data**").

We will only use the complaint data to process the complaint and to check on the level of care and service we provide or how contracts are performed. We do compile and publish statistics showing information like the number of complaints we receive, but not in a form which identifies anyone. We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

Similarly, where enquiries are submitted to us we will only use the information supplied to us to deal with the enquiry and any subsequent issues and to check on the level of care and service we provide. When we take enforcement action against someone, we may publish the identity of the defendant in our Annual Report or elsewhere. Usually we do not, identify any complainants unless the details have already been made public.

We will keep complaint data contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for two years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

The legal basis for this processing is our legitimate interests in dealing with the complaint appropriately and transparently.

Other processing that we may carry out

1.12 **Website data.** We may process data about your use of our website ("**website data**"). The website 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 website data is our analytics tracking system. This website data may be processed for the purposes of analysing the use of the website.

1.13 **Correspondence data.** We may process information contained in or relating to any communication that you send to us ("**correspondence data**"). 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 our 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.

1.14 **Enquiry data.** We may process information contained in any enquiry you submit to us regarding our residential, specialist transition, and any other services ("**enquiry data**"). The enquiry data may be processed for the purposes of offering, marketing and selling relevant services to you.

The legal basis for this processing is our legitimate interests in responding to your enquiry appropriately.

1.15 **Other processing activities.** In addition to the specific purposes for which we may process your personal data set out above, 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.

1.16 **Please do not supply any other person's personal data to us, unless we prompt you to do so or have entered into a written data processing agreement with you.**

2. Providing your personal data to others

2.3 **Our partner service providers.** We may share your data to our partners who manage and support us in providing our services including:

- a) NHS Trusts and hospitals that are involved in your care.
- b) NHS Digital and other NHS bodies.
- c) General Practitioners (GPs).
- d) Ambulance Services.
- e) Private Sector Healthcare Providers
- f) Voluntary Sector Providers

2.4 You may be receiving care from other people as well as the NHS, for example Social Care Services. We may need to share some information about you with them so we can all work together for your benefit if they have a genuine need for it or we have your permission. Therefore, we may also share your information, subject to strict agreement about how it will be used, with:

- a) Social Care Services.
- b) Education Services.
- c) Local Authorities.
- d) Voluntary and private sector providers working with the NHS.

We may use third party service providers to help us operate our business and our web site or administer activities on our behalf. We may share your information with these third parties for those limited purposes provided that you have given us your permission.

We will not disclose your information to any other third parties without your permission unless there are exceptional circumstances, such as if the health and safety of others is at risk or if the law requires us to pass on information.

2.5 **Our insurers/professional advisers.** We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice and managing legal disputes.

2.6 **Social Media Platforms.** We operate the following social media pages LinkedIn and Twitter and Facebook. If you join one of our Social Media pages, please note that the provider of the social media platforms have their own privacy policies and we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data on our social media pages.

2.7 **Where we provide your personal data to any third party.** Where we share your personal data with any third party, we will ensure this processing is protected by appropriate safeguards including a suitable data processing agreement with that third party.

2.8 **To comply with legal obligations.** In addition to the specific disclosures of personal data detailed above, we may also disclose your personal data where such disclosure is necessary for compliance with a legal obligation we have to comply with, or in order to protect your vital interests or the vital interests of another individual.

3. Transfers of your personal data outside of the European Economic Area

If in the future your personal data is transferred outside of the EEA, we will ensure that either (a) The European Commission has made an "adequacy decision" with respect to the data protection laws of the country to which it is transferred, or (b) we have entered into a suitable data processing agreement with the third party situated in that country to ensure the adequate protection of your data. In all cases, transfers outside of the EEA will be protected by appropriate safeguards.

4. Retaining and deleting personal data

4.3 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.

4.4 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. Amendments

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

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

5.5 We may notify you of changes to this policy by email.

6. Your rights

6.3 You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:

- (a) your request not being found to be unfounded or excessive, in which case a charge may apply; and
- (b) the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).

6.4 We may withhold personal information that you request to the extent permitted by law.

6.5 The rights you have under data protection law are:

- (a) the right to access;
- (b) the right to rectification;
- (c) the right to erasure;
- (d) the right to restrict processing;
- (e) the right to object to processing;
- (f) the right to data portability;
- (g) the right to complain to a supervisory authority; and
- (h) the right to withdraw consent.

- 6.6 **Your right to access your data.** You have the right to ask us to confirm whether or not we process your personal data and, to have access to the personal data, and any additional information. That additional information includes the purposes for which we process your data, the categories of personal data we hold and the recipients of that personal data. You may request a copy of your personal data. The first copy will be provided free of charge, but we may charge a reasonable fee for additional copies.
- 6.7 **Your right to rectification.** If we hold any inaccurate personal data about you, you have the right to have these inaccuracies rectified. Where necessary for the purposes of the processing, you also have the right to have any incomplete personal data about you completed.
- 6.8 **Your right to erasure.** In certain circumstances you have the right to have personal data that we hold about you erased. This will be done without undue delay. These circumstances include the following: it is no longer necessary for us to hold those personal data in relation to the purposes for which they were originally collected or otherwise processed; you withdraw your consent to any processing which requires consent; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are certain general exclusions of the right to erasure, including where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for establishing, exercising or defending legal claims.
- 6.9 **Your right to restrict processing.** In certain circumstances you have the right for the processing of your personal data to be restricted. This is the case where: you do not think that the personal data we hold about you is accurate; your data is being processed unlawfully, but you do not want your data to be erased; it is no longer necessary for us to hold your personal data for the purposes of our processing, but you still require that personal data in relation to a legal claim; and you have objected to processing, and are waiting for that objection to be verified. Where processing has been restricted for one of these reasons, we may continue to store your personal data. However, we will only process it for other reasons: with your consent; in relation to a legal claim; for the protection of the rights of another natural or legal person; or for reasons of important public interest.
- 6.10 **Your right to object to processing.** You can object to us processing your personal data on grounds relating to your particular situation, but only as far as our legal basis for the processing is that it 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 our legitimate interests or those of a third party. If you make an objection, we will stop processing your personal information unless we are able to: demonstrate compelling legitimate grounds for the processing, and that these legitimate grounds override your interests, rights and freedoms; or the processing is in relation to a legal claim.
- 6.11 **Your right to object to direct marketing.** You may instruct us at any time not to process your personal information for marketing purposes.

In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

You can object to us processing your personal data for direct marketing purposes. If you make an objection, we will stop processing your personal data for this purpose.

- 6.12 **Your right to object for statistical purposes.** You can object to us processing your personal data for statistical purposes on grounds relating to your particular situation, unless the processing is necessary for performing a task carried out for reasons of public interest.
- 6.13 **Automated data processing.** To the extent that the legal basis we are relying on for processing your personal data is consent, and where the processing is automated, you are entitled to receive your

personal data from us in a structured, commonly used and machine-readable format. However, you may not have this right if it would adversely affect the rights and freedoms of others.

- 6.14 **Complaining to a supervisory authority.** If you think that our processing of your personal data infringes data protection laws, you can lodge a complaint with a supervisory authority responsible for data protection. You may do this in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.
- 6.15 **Right to withdraw consent.** To the extent that the legal basis we are relying on for processing your personal data is consent, you are entitled to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.
- 6.16 **Exercising your rights.** You may exercise any of your rights in relation to your personal data by written notice to us in addition to the other methods specified above.

7. Cookie Policy

For information about how we use Cookies please see our Cookie Policy at <https://www.sequencecaregroup.co.uk/cookies>.

Links to other websites

This Privacy Statement applies solely to personal data collected by us. Our website may contain links to external sites, operated by other owners and third parties, over which we have no control. For this reason, we encourage our visitors to be aware when they leave our website to read their privacy policy applicable. Any access to such other websites or pages is entirely at your own risk. We are not responsible for the privacy policies, content or security of any third-party websites linked to our website.

8. Our details

- 8.3 This website is owned and operated by Sequence Care Limited.
- 8.4 We are registered in England and Wales under registration number 06259354 and our registered office is at Highbury Crescent Rooms, 70 Ronalds Road, London, N5 1XA.
- 8.5 You can contact us:
- (a) by post, using the postal address given above;
 - (b) using our website contact form;
 - (c) by telephone, on the contact number published on our website from time to time; or
 - (d) by email, using the email address published on our website from time to time.

9. Data protection officer

Our data protection officer's contact details are: Sue Davis, who can be contacted via email: sue.davis@sequencecaregroup.co.uk or telephone: 01992 785 460.