



# Privacy Policy

## General

Grosvenor Health and Social Care (GHSC) are committed to complying with the General Data Protection Regulation and the Data Protection Act 2018, once enacted. Looking after the personal information you share with us is very important, and we want you to be confident that your personal data is kept safely and securely and to understand how we use it to offer you a better and more personalised experience.

We have published this notice to help you understand:

- How and why GHSC collect information from you;
- Who we share your information with, why and on what basis; and
- What your rights are.

If we make changes to this notice we will notify you by updating it on our website. GHSC will be what is known as the 'Data Controller' of the personal data you provide to us, and we will sometimes refer to ourselves in this notice as "we" or "us". By Data Controller, this means GHSC determines the purposes and way in which any personal data are, or will be, processed.

## Cookies Notice

This notice is designed to help you understand what cookies are, how GHSC uses them and the choices you have in regards to their use.

By continuing to use any of the following you are agreeing to our use of cookies in the manner described in this notice:

- <http://www.grosvenorhsc.co.uk>
- <http://www.sevacare.org.uk>
- <http://www.synergyhomecare.co.uk>
- <http://mayfair-homecare.co.uk>
- <http://www.carecymru.com>
- <http://training.sevacare.org.uk>

- <http://training.mayfair-homecare.co.uk>
- <http://training.synergyhomecare.co.uk>
- <http://training.carecymru.com>

## Cookies & Privacy Policy

### **What are Cookies?**

Cookies are small text files that are stored on your browser or the hard drive of your computer or other device when you visit the Site. This allows the Site to recognise you as a user either for the duration of your visit (using a 'session cookie') or for repeat visits ( a 'persistent cookie'). They are not harmful and do not contain any information such as your home address, date of birth or credit card details.

The cookies we use fall into four broad types:

### **Strictly Necessary Cookies**

These cookies are essential in helping you to move around our Site and use its features, such as accessing secure areas of the website. Without these cookies, services you have asked for, such as setting up an account cannot be provided. These cookies do not gather information about you that could be used for marketing or remembering where you've been on the internet.

### **Analytical/Performance Cookies**

In order to keep the Site, its services and products relevant, easy to use and up-to-date, we use web analytics services to help us understand how people use our Site. For example, we can see which parts of the Site and products are most popular, identify when errors occur, and test different versions of a page or feature to see which one works best.

### **Functionality Cookies**

These cookies allow websites and applications to remember choices you make (such as your user name, form data) and provide enhanced, more personal features. The information these cookies collect is usually anonymised which means we can't identify you personally. They do not gather any information about you that could be used for selling advertising or remembering where you've been on the internet, but do help us to serve you with advertising that is more relevant to you.

### **Targeted Marketing Cookies**

We also use cookies to assist in targeted advertising. Without these cookies, online advertisements you encounter will be less relevant to you and your interests. We also use them to measure the effectiveness of our marketing communications, for example by telling us if you have responded to an advert that we have sent you.

If you would like more information on any of these types of Cookies, including how to opt-out, please visit [www.youronlinechoices.com](http://www.youronlinechoices.com)

## What do we use cookies for?

They enable you to transact, whilst other non-essential cookies enable us to give you an enhanced, personalised web experience and determine relevant products to show you.

- To personalise and improve your customer experience.
- To allow you to securely sign in to your e-learning portal account.
- To recognise the device that you are using.
- To record the areas of the Site that you have visited, products you have viewed and time spent browsing. GHSC uses this information to help make the website more user friendly, develop our site design and to continuously improve the quality of the service we provide.
- To distribute visitors to our site evenly across platforms to ensure the content is served at the fastest possible speed.
- For re-marketing purposes to determine relevant related services to show you when you're browsing on other selected websites. These cookies can be associated with services provided by a third party such as an advertising network.
- We also offer you the facility to share your experience on our site through social media sites such as Facebook and Twitter. By using these features, you are consenting to allow cookies from these providers. More information about how these providers use cookies can be found at their websites.

Cookies are an essential part of how our Site works, as they remember certain information about a visitor. GHSC uses First Party cookies (these are placed there and used solely by GHSC) and Third Party cookies (these are placed there by third parties we work with).

## Are cookies safe?

Yes. The information stored in cookies is safe and anonymous to any external third party, and your account security is never compromised. You can find more information about cookies at <https://www.google.com/intl/en-GB/policies/technologies/cookies/>.

## Can I turn off cookies?

Yes – but if you choose not to allow the use of cookies, your experience of our Site will be limited and many integral aspects of the Site, including (but not limited to) accessing your account, will not work at all.

To change your cookie settings, or if you want to be notified each time a cookie is about to be used, you should amend the settings provided in your web browser to prevent us from storing cookies on your computer hard drive.

For information on how to disable cookies, please consult the "Help" tab of your browser via the menu bar. For further information on non-essential cookies used for targeting and banner advertising please see below.

## Details of our third party cookies

GHSC allows selected Third Parties who participate with us in marketing programs to place cookies when you visit our site. These cookies enable us to monitor which areas of the site

you visit and how you reached our site.

For details of the Third Party cookies we use please see the table below. GHSC is not responsible for the content or privacy policies of Third Parties or other websites, and we advise that you check these yourself.

The following Cookies are all used for Analytical and Targeting purposes:

- Google Tag Manager
- Google Analytics

## Google analytics - Opt Out

Website visitors who don't want their data used by Google Analytics can install the Google Analytics opt-out browser add-on. To opt-out of Analytics for the web, visit <https://tools.google.com/dlpage/gaoptout> Google Analytics opt-out page and install the add-on for your browser. Learn more about the opt-out and how to properly install the browser add-on <https://support.google.com/analytics/answer/181881>. Visitors can also opt-out of Google Analytics for Display Advertising and customize Google Display Network ads using the <https://www.google.com/settings/ads>

This Cookie Notice was last updated on 17 May 2018, and further changes will be communicated by updating this notice.

## Privacy

### What information we collect:

You will need to set up an online account when registering for the e-learning portal, so we can set this up we will ask you to provide some personal information such as;

- Full name
- Contact numbers, and
- Email address.

In order to undertake website personalisation, we will also gather information about the devices you use to access our sites (desktop and mobile), and this may include IP address. For further information on our use of cookies and tracking please see our Cookie Notice.

When you visit our offices GHSC may use CCTV for security monitoring purposes. When you call any of our offices, we may record your calls in order to protect the interests of one or more participants.

### How do we use your information?

Data Protection says that we are allowed to use and share your personal data only where we have a proper reason to do so. The law says we must have one or more of these reasons and these are:

- Contract - your personal information is processed in order to fulfil a contractual arrangement e.g. in order to deliver our services to you or in order to communicate services updates.
- Consent – where you agree to us using your information in this way e.g. for storing your payment details.
- Legitimate Interests - this means the interests of GHSC in managing our business to allow us to provide you with the best products and service in the most secure and appropriate way e.g. to transfer your data to certain Third Party’s such as pharmacies or regulatory bodies
- Legal Obligation – where there is statutory or other legal requirement to share the information e.g. when we have to share your information for law enforcement purposes.

Here is a list of the ways that we may use your personal information, and which of the reasons described above we rely on to do so. Where we list legitimate interests as a reason, we also describe below what we believe these legitimate interests are.

<b>What we use your personal information for</b>	<b>Our reasons (legal basis)</b>	<b>Our explanation of legitimate interests</b>
Process a job application	Legitimate interest Consent	Necessary to provide employment
Processing of payroll data.	Fulfilling a contract	N/A
Provide private care package	Fulfilling a contract Consent	N/A
Provide a Local Authority care package	Fulfilling a contract	N/A
Process a general enquiry	Consent	N/A
Stakeholder emergency contacts	Legitimate interests	Being able to contact an individual’s designated family member, friend or emergency contact in an emergency is a legitimate interest as a responsible employer
Contact you to undertake customer satisfaction surveys or for market research.	Legitimate interest	Developing services and applications that attract and retain clients. Improving user interaction with our sites.
Notifying you about enhancements to our services, such as changes to the website and new services that may be of interest to you.	Legitimate interest	Developing services and applications that attract and retain clients. Improving user interaction with our sites.
Service an SAR request	Legal Obligation	N/A
To detect, investigate and report financial crime (e.g.	Legal Obligation Legitimate interests	Developing and improving how we deal with financial

Fraud)		crime. Complying with any legal obligation placed on us by regulators such as HMRC. Complying with any regulations that apply to us. Process efficiency in dealing with such activity, and to make service and process improvements.
Criminal Behaviour	Legal Obligation Legitimate interests	Disclosing information about possible criminal acts or security threats to the relevant authorities.
Intra-group transfers	Legitimate interests	Necessary to provide continuous employment or services from within the group.

## Who are we sharing your information with and why

GHSC works with a number of trusted suppliers, agencies and businesses in order to provide you the high quality services you expect from us such as credit reference agencies, fraud prevention agencies, product technicians visiting your home and market research companies amongst others.

Some examples of the categories of third parties with whom we share your data are:

### IT Companies:

GHSC works with partners who support our website and other business systems.

### Marketing Companies:

We work with marketing companies who help us manage our electronic communications with you or carry out surveys and product reviews on our behalf.

### Payment processing:

GHSC works with trusted third party payment processing providers in order to securely take and manage payments.

In order to process your application we will supply your personal information to credit reference agencies (CRA's) and they will give us information about you, such as your financial history. We do this to assess your creditworthiness and product suitability, check your identity, manage your account, trace, recover debts, and prevent criminal activity.

### Debt recovery and fraud prevention services:

Before we provide services to you, we undertake checks for the purposes of preventing fraud and money laundering, and to verify your identity. These checks require us to process personal data about you.

The personal data you have provided, we have collected from you, or we have received from third parties will be used to prevent fraud and money laundering, and to verify your identity.

Details of the personal information that will be processed include, for example: name, address, date of birth, contact details, financial information, employment details, device identifiers including IP address and vehicle details.

We and fraud prevention agencies may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime.

We process your personal data on the basis that we have a legitimate interest in preventing fraud and money laundering, and to verify identity, in order to protect our business and to comply with laws that apply to us. Such processing is also a contractual requirement of the services or financing you have requested.

We process your personal data on the basis that it is necessary in the public interest or in exercising official authority for us to prevent fraud and money laundering, and to verify identity, in order to protect ourselves and to comply with laws that apply to us.

Fraud prevention agencies can hold your personal data for different periods of time, and if you are considered to pose a fraud or money laundering risk, your data can be held for up to six years.

#### Automated Decisions

As part of the processing of your personal data, decisions may be made by automated means. This means we may automatically decide that you pose a fraud or money laundering risk if our processing reveals your behaviour to be consistent with money laundering or known fraudulent conduct, or is inconsistent with your previous submissions, or you appear to have deliberately hidden your true identity. You have rights in relation to automated decision-making: if you want to know more please contact us using the details above.

#### Consequences of Processing

If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services you have requested, or to employ you, or we may stop providing existing services to you.

A record of any fraud or money laundering risk will be retained by the fraud prevention agencies, and may result in others refusing to provide services, financing or employment to you. If you have any questions about this, please contact us on the details above.

## Data Transfers

Whenever fraud prevention agencies transfer your personal data outside of the European Economic Area, they impose contractual obligations on the recipients of that data to protect your personal data to the standard required in the European Economic Area. They may also require the recipient to subscribe to 'international frameworks' intended to enable secure data sharing.

## Your Rights

Your personal data is protected by legal rights, which include your rights to object to our processing of your personal data; request that your personal data is erased or corrected; request access to your personal data.

For more information or to exercise your data protection rights, please contact us using the contact details above.

You also have a right to complain to the Information Commissioner's Office, which regulates the processing of personal data

Some of the information you provide to us may be transferred outside the European Economic Area to countries such as Canada and the US. This is a transfer to a "third country". For example, GHSC has a business relationship with Celltrak Technologies who provide us with IT support together with customer and supplier account administration services. Although the data is held in UK data centres colleagues in Canada may access it to undertake the activities described above.

GHSC also works with suppliers and partners who may make use of cloud and/or hosted technologies. We undertake data security due diligence on our partners and ensure that that these partners conform to appropriate accreditations.

Wherever transfers of data to third countries occurs GHSC will put in place an appropriate contractual provision to ensure that there are strict rules regarding both the confidentiality and security of your information. To find out more please contact us at [dataprotection@grosvenorhsc.co.uk](mailto:dataprotection@grosvenorhsc.co.uk).

## Keeping in touch with you

We want to keep you up to date with information about new services, special offers and improvements to our website. When you set your account up, we will ask you if you want to receive this type of marketing information.

GHSC will not share your information with companies outside of Grosvenor Health and Social Care Limited for their marketing purposes.

## Marketing Opting Out

If you decide you do not want to receive this marketing information you can request that we stop by writing to the Data Protection Officer at the address provided above,



emailing [dataprotection@grosvenorhsc.co.uk](mailto:dataprotection@grosvenorhsc.co.uk), by calling the Contact Centre on 01902 625 070, or via the unsubscribe link within the email.

You may continue to receive mailings for a short period while your request is being dealt with.

## How long we keep your information

If we collect your personal information, the length of time we retain it is determined by a number of factors including the purpose for which we use that information and our obligations under other laws.

We may need your personal information to establish, bring or defend legal claims. For this purpose, we will always retain your personal information for 7 years after the date it is no longer needed by us for any of the purposes listed under how we use your information above. The only exceptions to this are where:

- the law requires us to hold your personal information for a longer period, or delete it sooner;
- you exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law;
- we bring or defend a legal claim or other proceedings during the period we retain your personal information, in which case we will retain your personal information until those proceedings have concluded and no further appeals are possible; or
- In limited cases, existing or future law or a court or regulator requires us to keep your personal information for a longer or shorter period.

## What are your rights

You are entitled to request the following from GHSC, these are called your Data Subject Rights and there is more information on these on the Information Commissioners website [www.ico.org.uk](http://www.ico.org.uk)

- **Right of access** –to request access to your personal information and information about how we process it
- **Right to rectification** –to have your personal information corrected if it is inaccurate and to have incomplete personal information completed
- **Right to erasure** (also known as the Right to be Forgotten) – to have your personal information erased.

- **Right to restriction of processing** – to restrict processing of your personal information
- **Right to data portability** - to electronically move, copy or transfer your personal information in a standard form
- **Right to object** - to object to processing of your personal information
- **Rights with regards to automated individual decision making, including profiling** – rights relating to automated decision making, including profiling

If you have any general questions about your rights or want to exercise your rights please contact [dataprotection@grosvenorhsc.co.uk](mailto:dataprotection@grosvenorhsc.co.uk)

You have the right to lodge a complaint with a data protection regulator in Europe, in particular in a country you work or live or where your legal rights have been infringed. The contact details for the Information Commissioner's Office (ICO), the data protection regulator in the UK, are available on the ICO [www.ico.org.uk](http://www.ico.org.uk) where your personal information has or is being used in a way that you believe does not comply with data, however, we encourage you to contact us before making any complaint and we will seek to resolve any issues or concerns you may have

### Subject Access Request

Should you wish to obtain a copy of the information held by us please download and complete the form [here](#) and return to the address detailed. Alternatively please contact Head Office on 01902 625070 and they will post a form to your specified address. All requests will be dealt with in 30 days of receipt of the form providing sufficient identification has been provided.

### Head office contact details

Should you need to contact us please write to:

Data Protection Officer Grosvenor Health and Social Care, Unit 9 Pendeford Place, Pendeford Business Park, Wobaston Road, Wolverhampton, WV9 5HD or via [dataprotection@grosvenorhsc.co.uk](mailto:dataprotection@grosvenorhsc.co.uk) quoting security and privacy enquiry.