

Privacy Notice

Your privacy is hugely important to us, and we want you to be confident that the information you give us is safe and secure. In this Privacy Notice we'll explain how we use it to give you a better experience.

We'll also tell you how and why we collect your personal information, your rights and choices when it comes to these details, as well as the steps we take to keep it secure and confidential.

What this Privacy Notice covers

This is the Privacy Notice for SOS Homecare, our related mobile applications or other similar devices, and tools.

We are committed to being transparent on how we collect, use and protect your personal information. The data controller is SOS Homecare Limited (referred to in this Notice as "we", "us" or "our"). We want you to be confident that the personal information you give us is safe and secure with us, and understand how we use it to offer you a better experience.

Our Privacy Notice explains:

- the personal information we collect;
- how and why we collect and use your personal information;
- why we process your personal information;
- when and why we will disclose your personal information to other organisations;
- the rights and choices you have when it comes to your personal information;
- why we use cookies;
- the steps we take to ensure your information is kept secure and confidential;
- how long we will hold your information for; and
- how to contact us.

Personal information we collect

In order for us to provide you with appropriate care and support we need to collect and use your personal information, including:

Data	Employees	Clients
Age	✓	✓
Bank details	✓	✓
Contact details (including name, postal address, email address & phone numbers)	✓	✓
Disability	✓	✓
Ethnicity	✓	✓
Gender	✓	✓
Health	✓	✓
Details of absence (including annual leave, sickness, parental leave)	✓	
Next of Kin details	✓	✓
Performance	✓	

Criminal Convictions	✓	
Employment History	✓	

When you register as a participant in online surveys you may provide us with your email address and IP address

When you visit our Site we may collect information about your online browsing behaviour and any devices you have used to access our Site (including your IP address, browser type and mobile device identifiers)

How we collect and use your personal information – employees

1. Personal information which you share with us may be used in a number of ways:
 - To comply with our legal and statutory responsibilities as your employer
 - To ensure we provide a quality service that meets the care and support needs and preferences of our clients
 - For statistical analysis
 - To prevent harm to yourself or others

2. We may **share** your information with, and **obtain** information about you from the following:
 - HMRC
 - The Care Quality Commission
 - Previous employers
 - Future employers
 - The Disclosure and Barring Service
 - Your Next of Kin

How we collect and use your personal information - clients

1. Personal information which you share with us may be used in a number of ways:
 - To provide you with a quality service that meets your care and support needs
 - For statistical analysis
 - To prevent harm to yourself or others

2. We may **share** your information with, and **obtain** information about you from the following:
 - The Local Authority & Social Services
 - The Care Quality Commission
 - Medical professionals involved in your care (eg your Doctor, District Nurse, Pharmacist, therapist etc)
 - Emergency Services
 - Your Next of Kin
 - Your Landlord (where you live in sheltered or supported accommodation)
 - Our employees

3. We will **not disclose** your personal information to individuals not involved in the provision of your care and support.

How we collect and use your personal information – clients & employees

1. We may also use the personal information referred to in this section to generate anonymised data for the purposes of internal reporting and analysis, enabling us to improve the service we offer.
2. We collect and may use your personal information to:
 - contact you in response to the communications that you have directed at us. We want to be able to help you so we use personal data to provide clarification or assistance in response to your communications;
 - invite you to take part in surveys. Any feedback you provide will only be used to improve our services. However, if we contact you about this, you do not have to take part in the activities.
3. If you're providing us with another person's personal information you should first ask them to read this Privacy Notice. By giving us personal information about another person you are confirming that they have given you consent to provide the personal information to us and that they understand how their details will be used.
4. We will periodically review your personal information to ensure that we do not keep it for longer than is permitted by law.

Why do we process your personal information?

We will only collect and use your personal information (as described in sections 2 and 3) in accordance with data protection laws. Our grounds for processing your personal information are as follows:

- **Contract** – it is necessary for us to collect and process your personal data in order to ensure that the care and support we provide meets the needs and preferences of our clients.
- **Legal obligation** – it is necessary for us to collect and process your personal data in order for us to comply with the law and statutory obligations
- **Vital interests** – in exceptional circumstances we may need to share your personal information in order to protect someone's life. In most cases this will only apply if you are physically or legally unable to give your consent.
- **Legitimate Interests** – We may use and process some of your personal information where we have sensible and legitimate business grounds for doing so. Our legitimate interests for processing your personal information are:
 - to enable you to access and use our services, or be employed by us;
 - to communicate with you about our services.
 - to improve our services.

From May 2018, you will have a right to object to our use of your personal information for these legitimate interests, including a right to object to profiling by us.

Use of children's personal information

We do not knowingly collect, store or process any personal information about children under the age of 16. If you are aged under 16 please get your parent or guardian's permission before you provide any personal information to us.

Disclosure of your personal information to other organisations

The personal information that we collect when you use our service is confidential. We may disclose your personal information to a third party (other than those involved in the provision of care and support for a client) in the following circumstances:

- If required or permitted to do so by law;
- If required to do so by any court, or any other regulatory, compliance, government or law enforcement agency;
- If necessary in connection with legal proceedings or potential legal proceedings;

Your information rights and responsibilities

You already have certain rights under existing data protection legislation, including a right to request a copy of the personal information we hold on you, if you request it in writing. From 25 May 2018 you will have the following rights:

- **Right to correct:** the right to have your personal information rectified if it is inaccurate or incomplete;
- **Right to erase:** the right to request that we delete or remove your personal information from our systems;
- **Right to restrict our use of your information:** the right to 'block' us from using your personal information or limit the way in which we can use it;
- **Right to data portability:** the right to request that we move, copy or transfer the personal information which you have supplied to us;
- **Right to object:** the right to object to our use of your personal information including where we use it for our legitimate interests. If you raise an objection we will stop processing your personal information unless very exceptional circumstances apply, in which case we will let you know why we're continuing to process your personal information.

We will use reasonable efforts consistent with our legal duty to provide you with your rights in accordance with data protection legislation.

Cookies

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. The information is used to track visitor use of our website and to compile statistical reports on website activity.

For further information visit www.allaboutcookies.org or www.aboutcookies.org

You can set your browser not to accept cookies, and the above websites will tell you how to remove cookies from your browser. However, in a few cases some of our website features may not function as a result.

Keeping your personal information secure

Keeping information about you secure is very important to us so we store and process your personal information in accordance with the high standards required under data protection legislation.

From time to time and for operational reasons the personal information we collect from you may be transferred to and stored in countries outside of the European Economic Area ("EEA"). Your information may also be processed by some of our service providers which operate outside the EEA. Different countries have different data protection and security laws and some of these do not offer the same level of protection as you enjoy under UK data protection legislation. However, when we

appoint our service providers to help us provide products and services to you (which may include some based in the USA), we take care to ensure that they have appropriate security measures in place.

We do our best to keep the information you disclose to us secure. For more information about this, and how we would deal with any data breaches, please ask to see a copy of our Data Protection Policy.

How long do we keep your personal information?

We will only hold your personal information on our systems for the period required or permitted by law. Even if we delete your personal information it may persist on back-up or archival media for legal, tax or regulatory purposes.

How to contact us

For further information on how your information is used, how we maintain the security of your information, and your rights to access the information we hold on you, please contact: info@soshomecare.co.uk

If you're not satisfied with the way any complaint you make in relation to your personal information is handled by us then you may be able to refer your complaint to the relevant data protection regulator. In the UK, this is the Information Commissioner's Office.