

DATA PROTECTION PROMISE

We are committed to protecting the privacy and security of your personal information. This Data Protection Promise describes how we collect and use personal information about you and those around you such as your family or next of kin during and after your relationship with us, in accordance with the General Data Protection Regulation (GDPR) and Data Protection Act 2018.

It is important that you read this notice so that you are aware of how and why we are using such information.

Who We Are We are Net Care East Anglia Limited trading as Home Instead, a company registered in England. Our company registration number is 6668906 and our registered office address is Unit 6, Greenway, Swaffham, PE37 7FD

How to Contact Us

Office	Office Address	Telephone Number	Office Hours
Head Office	6 Green way, Swaffham, PE37 7FD	<u>01760</u> <u>358970</u>	Mon – Fri 9am – 5pm
Mid Norfolk	37 Market Place, Hingham, NR9 4AF	01953 306965	Mon – Fri 9am – 5pm
North Norfolk	3 Market Place, Holt, NR25 6BE	01263 650983	Mon – Fri 9am – 5pm
West Norfolk	66 High Street, Kings Lynn, PE30 1AY	01553 387967	Mon – Fri 8am – 4pm

Cambridge	45 Mill Road, Cambridge, CB1 2AW	<u>01223</u> <u>801676</u>	Mon – Fri 8am – 4pm
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Sending us an email to

admin@hieast.co.uk

Writing to us at our trading address

Home Instead, 6
Greenway, Swaffham,
Norfolk, PE37 7FD

Our Privacy

Champion

is

Laura McEwan laura@hinorfolk.co.uk

We will comply with data protection law when it comes to the processing of your data. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

The kind of information we collect and hold about you

We may collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.

- Date of birth, gender, marital status and details of any dependants
- Your preferences, hobbies and interests
- Biographical information about you

How is your personal information collected

We typically collect personal information about you through our care consultation process directly from you. We may sometimes collect additional information from third parties including your family and/or health and/or social care professionals involved in assisting you.

Why we collect your personal data and our legal basis for doing so

We collect and process your personal data in order to:

Why	Lawful Basis
<ul style="list-style-type: none"> ✓ provide you or your family with our services which may include liaising with health and/or social care professionals ✓ Matching you with a CAREGiver ✓ To send you information which is connected with the services we are providing to you 	Performance of a contract
<ul style="list-style-type: none"> ✓ To enable us to comply with our legal obligations to our social care regulator 	Compliance with a legal obligation
<ul style="list-style-type: none"> ✓ Protect your or others' vital interests 	Necessary to protect vital interests
<ul style="list-style-type: none"> ✓ Keep you informed about any changes to our services ✓ Gather feedback on our performance in order to ensure that the quality of the services which we offer is continually enhanced and refined and for purposes which are within legitimate business such as business development purposes 	Legitimate Interests

<p>✓ To comply with our contractual obligations to our franchisor, Home Instead Limited (“Home Instead National Office”)</p>	
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We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, where this is required or permitted by law.

How we use particularly sensitive information

We may also collect, store and use the following "special categories" of more sensitive personal information in order to provide our services and our lawful basis for doing so is the fact that such processing is connected with provision of social care:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions
- Information about your health, including any medical conditions and health.

If you fail to provide personal information

Please note that without collecting and processing certain personal data including any required from you, your family or next of kin, we will be unable to provide our services. As such, if you would like us to provide the services to you or your family, we will require certain information from you.

How long we keep your data

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To comply with our obligations to HMRC and the social care regulator we have to retain:

- ✓ All financial records and records kept electronically on our customer relationship management (CRM) system for 7 years from the date of last entry;
- ✓ all paper records containing your personal data for 6 years from the date of last entry.

**Who has Access to
Your Data**

Some of your information may be shared with:

- ✓ the relevant members of our staff including CAREGivers, who need to know this information in order to provide our services to you or your family. We will only share such of your information as our CAREGivers need to know in order to carry out their job
- ✓ our office personnel involved in the management and administration of the care services which you or your family are receiving
- ✓ other health and/or social care professionals and emergency services where appropriate
- ✓ other care agency (including any other Home Instead franchised office) who may be supporting you or are providing additional services to you.

As a condition of us being able to provide you with Home Instead services, our franchisor, Home Instead Limited (“Home Instead National Office”) will have access to your information to:

- monitor how we provide the services;
- monitor the quality of the services we provide to ensure they meet with Home Instead standards;
- ensure that the quality of the services which we offer is continually upheld, enhanced and refined.

Home Instead National Office may also use the information in a general way to analyse activities and trends across the Home Instead network but, where possible, data will be anonymised for such analysis.

We may also be inspected from time to time by Home Instead National Office, HMRC and/or the social care regulator who may access your information for the purposes of audit/inspection.

We and Home Instead National Office may use third parties for data processing purposes only, but this will always be done in a way that continues to protect the confidentiality of your information.

We do **not**, as a matter of course, transfer your data outside of the European Economic Area and use, as far as possible, UK or European data centres. Where we use providers who only have overseas-based data centres we only do so in limited circumstances and always only after completing a thorough due diligence process to ensure the continued safety and security of your data.

Netcare Norfolk Limited reviews all of our data processing on an annual basis and will assess if the national data opt-out applies to our processing. This is recorded in our Record of Processing Activities. All new processing is also assessed to see if the national data opt-out applies.

National Data Opt-Out

(ENGLAND ONLY –
delete if doesn't apply)

You should note that the data opt-out does not apply where we only use your data for providing our care services. In most cases this will be the case.

Should at any time, our data processing falls within scope of the national data opt-out we will use [MESH](#) to check if any of our clients have opted out of their data being used for this purpose.

At this time, we do not share any data for planning or research purposes for which the national data opt-out would apply. We review this on an annual basis and for any new processing.

**Your Duty to Inform
us of changes**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

Your Rights

Because the data we hold about you is your data, you have the following rights in respect of the personal data we hold about you:

1. **Right to Access** – this means that you can ask us for a copy of all personal data we hold about you. This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
2. **Correction Right** – if you believe that any of the information we hold about you is incorrect or out of date, you have the right to correct such information by providing us with the correct up to date information. In addition, you can ask us to delete the incorrect or out of date information and we will be happy to do so unless we are prevented from doing so by law or regulation.
3. **Right to be Forgotten** – this enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. Please note that where we are obliged to keep your personal data because of a regulatory or legal requirement, we will not be able to delete the data and must continue to retain it.
4. **Right to Restrict Processing** – in some limited circumstances you have the right to restrict the processing of your data.
5. **Right of Objection to Processing** – you have the right to object to us using your data for direct marketing purposes and to profiling.

6. **Right of Data Portability** – you have the right to request a copy of the personal data we hold about you in a commonly used and machine-readable format. We can provide your data either to you or to such other third party as you specify in your request.
7. **Automated Decision-Making Objection Right** – automated decision-making is where a decision is made entirely by technological means without human intervention. We don't use or rely on automated decision-making.

If you would like to exercise any of the above rights, please contact (preferably in writing) our Privacy Champion using the contact details above.

Right to Complain

If you have any concerns about our handling of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office ("ICO") by visiting <https://ico.org.uk/concerns/> or telephoning the ICO helpline on 0303 123 1113.

Changes to this privacy policy

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates.

This policy was last updated – January 2021

If you have any questions about this privacy notice, please contact our Privacy Champion.