

# HALLMARK CARE HOMES' PRIVACY POLICY

| Contents   | Page |
|--|------|
| <a href="#">Data Privacy Summary</a>                                 | 2    |
| <a href="#">Residents' Policy</a>                                    | 4    |
| <a href="#">Relatives, supporters and friends policy</a>             | 8    |
| <a href="#">Suppliers Privacy Notice</a>                             | 11   |
| <a href="#">Website Visitors &amp; Facebook Page Visitors Policy</a> | 14   |
| <a href="#">Enquirers Privacy Notice</a>                             | 17   |

|                        |  |
|------------------------|--|
| <b>Version number</b>  | 2.0  |
| <b>Date of issue</b>   | 01/04/2020   |
| <b>Date for review</b> | 31/03/2021   |
| <b>Author</b>          | Interim Head of Compliance & Data Protection Officer                             |
| <b>Ratified by</b>     | Care Quality, Governance and Compliance Director & Senior Information Risk Owner |

If you have any questions or concerns regarding the content of this policy, please email Nick Banister Dudley, Data Protection Officer on [dpo@hallmarkcarehomes.co.uk](mailto:dpo@hallmarkcarehomes.co.uk).

---

## Data Privacy Summary

### Who are we?

We are Hallmark Care Homes and our Central Support office is located at 2 Kingfisher House, Woodbrook Crescent, Radford Way, Billericay, Essex, CM12 0EQ and we can be contacted on 01277 655655. We have 14 care homes in England and seven in Wales, as well as our Central Support office and this Privacy notice applies to all these locations:

#### England

- Admiral Court Care Home (Hallmark Care Homes (Leigh-on-Sea) Limited); Manchester Drive, Leigh-on-Sea, Essex, SS9 3HP
- Alexandra Grange Care Home (Hallmark Care Homes (Wokingham) Limited); Oaklands Drive, Molly Millars Lane, Wokingham, RG41 2RU
- Anisha Grange Care Home (Hallmark Care Homes (Billericay) Limited); Outwood Common Road, Billericay, Essex, CM11 2LE
- Anya Court Care Home (Hallmark Care Homes (Rugby) Limited); 286 Dunchurch Road, Rugby, Warwickshire, CV22 6JA
- Arlington Manor Care Home (Hallmark Care Homes (Cambridge) Limited); Wellbrook Way, Girton, Cambridge, CB3 0FW
- Banstead Manor Care Home (Hallmark Care Homes (Banstead) Limited); 8 Brighton Road, Banstead, Surrey, SM7 1BS
- Bucklesham Grange Care Home (Hallmark Care Homes (Ipswich) Limited); 141 Bucklesham Road, Ipswich, Suffolk, IP3 8UB
- Central Support office (Hallmark Care Homes (Holdings) Limited); 2 Kingfisher House, Woodbrook Crescent, Radford Way, Billericay, Essex, CM12 0EQ
- Chamberlain Court Care Home (Hallmark Care Homes (Tunbridge Wells) Limited); 77 Mount Ephraim, Tunbridge Wells, Kent, TN4 8BS
- Henley Manor Care Home (Hallmark Care Homes (Henley Manor) Limited); Mill Lane, Henley-on-Thames RG9 4HD
- Hutton View Care Home (Hallmark Care Homes (Hutton View) Limited); 3 Rayleigh Close, Hutton, Essex, CM13 1FF
- Kew House Care Home (Hallmark Care Homes (SW19) Limited); 58 Spencer Hill Road, Wimbledon, London, SW19 4EL
- Lakeview Care Home (Hallmark Care Homes (Lightwater) Limited); Lightwater Road, Lightwater, Surrey, GU18 5XQ
- Maycroft Manor Care Home (Hallmark Care Homes (Brighton) Limited); 2-8 Carden Avenue, Brighton, Brighton and Hove, BN1 8NA

#### Wales

- Bryn Celyn Care Home (Hallmark Care Homes (Maesteg) Limited); Maesteg Park, Maesteg, Bridgend, CF34 9LS
- Cherry Tree Care Home (Hallmark Care Homes (Caldicot) Limited); 209 Newport Road, Caldicot, Monmouthshire, NP26 4AF
- Greenhill Manor Care Home (Hallmark Care Homes (Merthyr) Limited); Duffryn Road, Pentrebach, Merthyr Tydfil, CF48 4BE
- Regency House Care Home (Hallmark Care Homes (Cardiff) Limited); Mill Road, Ely, Cardiff, CF5 4AH
- Shire Hall Care Home (Hallmark Care Homes (Bute Town) Limited); Overstone Court, Dumballs Road, Cardiff, CF10 5NT

- Ty Enfys Care Home (Hallmark Care Homes (Pentwyn) Limited); Marle Close, Pentwyn, Cardiff, CF23 7EP
- Ty Porth Care Home (Hallmark Care Homes (Porth) Limited); Cemetery Road, Porth, Rhondda Cynon Taf, CF39 0BH

Each of our care homes are registered with the Care Quality Commission (CQC) in England and with Care Inspectorate Wales (CIW) in Wales, for the provision of health and social care services for adults, with Greenhill Manor, one of our homes in Wales also providing services for younger adults with a physical disability. A number of our care homes also provide care and support for people who are living with dementia.

## Processing of Personal Information

Your privacy is important to us. This privacy notice provides information about the personal information that Hallmark Care Homes collects regarding residents, relatives, suppliers, website visitors and enquirers. If you are a prospective employee, details on the personal information that we collect and process about you can be found [here](#). If you are already a member of the Hallmark Care Homes team, details on the personal information we collect and process about you can be found in the Privacy and fair processing notice for current team members, which can be found on the e-learning portal.

Personal information is any information that identifies a living individual. This privacy policy explains what information we collect, how we intend to use it, the legal reasons for using your information, and your rights under the law.

Hallmark Care Homes is committed to making sure that personal information is used appropriately according to the law, and that confidential information given to us by you or others, is kept confidential and secure. Hallmark Care Homes has appointed team members with a specific remit in respect of data protection, and their job is to help safeguard the way your information is used and uphold your information rights. If you have any concerns or questions about how your information is being used, you can contact the Data Protection Officer by phone on 01277 655655, or by email on [dpo@hallmarkcarehomes.co.uk](mailto:dpo@hallmarkcarehomes.co.uk).

## Tell me more...

To see more about how we use your personal data, read the privacy notice or notices which apply best to your relationship with us:

- I am a resident – go to the [Residents' policy](#).
- I am a relative, supporter of friend of a resident – go to the [Relatives, supporters and friends policy](#).
- I am a supplier – go to the [Suppliers Privacy Notice](#).
- I am a website visitor or I have “liked” the Facebook page – go to the [Website Visitors & Facebook Page Visitors Policy](#).
- I am an enquirer – go to the [Enquirers Privacy Notice](#).

## Residents' Policy

### Personal information we hold on you

- Name, title, address and other contact details, date of birth, ethnicity, marital status, occupation, NHS number and contact details including next of kin or carer details
- Contact details/information regarding your family or supporters
- Bank details, bank statements, invoices and debt information (where you pay for your care)
- Funding and personal allowance records
- Contracts/agreements with Hallmark Care Homes.
- Power of Attorney or advocate information
- Your records if the service is transferring to us under contract from another care provider
- Information relating to your health and wellbeing and social care support and interventions, including care plan documentation, medication records, accident records and death records.
- Assessment of needs and mental capacity
- Family health and social history
- Sexual history including partners, sexual orientation where relevant
- Hospital, GP or Social Care referrals
- Reports about X-rays, pathology and other results
- Updates relating to care plans and other aspects of your health and care
- Clinical incidents that you have been involved in
- Information regarding adult safeguarding including concerns or protections in place
- Alerts and concerns
- Any special needs or preferences for receiving information
- Photography/video for marketing purposes (where relevant and when you have given consent).
- Photos and videos for care records or for use in the home
- CCTV recordings
- Record of daily activities
- Complaints and compliments
- Information required by regulators (risk assessments, accident and incident records)

### How do we use your information?

- We use your information to make sure you receive the right care at the right time.
- To deliver the best care possible while you are in our care; including meeting your social care needs.
- Health and Social Care information, which helps us make sure you receive any medication, as well as getting you to your hospital and GP appointments.
- Understanding your beliefs, to help you receive the right spiritual care and support.
- Customer surveys and feedback help us to improve the care that we provide to you.
- Using information to protect you from harm.
- Understanding your communication (hearing, speech, language) needs, to help us to communicate effectively with you.
- Handling concerns and complaints about the care we provide.
- Investigating incidents.
- Using your image to identify you and clinical interventions we have put in place.

- As part of our quality assurance processes, to ensure that we are delivering care correctly in line with regulatory requirements and Hallmark Care Homes' own internal standards.
- Sharing your photograph in marketing materials and publications, where you have provided consent.
- For the prevention of crime and to uphold safety (CCTV).

Relatives or next of kin contact details are requested to help Hallmark Care Homes involve these people in your care (with your consent).

The source of this data will either be yourself, your relatives, supporters, medical professionals or previous care providers.

## The lawful basis under which we process your data

The General Data Protection Regulation and Data Protection Act 2018 requires Hallmark Care Homes to have a legal basis before we process information about others.

### The legal basis for processing your personal information:

The lawful basis for processing your personal information is that we have a legal obligation, as a registered health and social care provider, to have appropriate records that allow us to deliver safe and effective care to residents. In some circumstances, we process your personal data to meet a legitimate interest. The processing is also necessary to meet our contractual obligations with you.

### Legal basis for processing special categories "sensitive" personal information:

We need to use the data in order to provide medical diagnosis, direct care, health and social care services to you and for adult safeguarding purposes where it is necessary to protect your interests when you are physically or legally incapable of providing consent.

## Marketing

We provide newsletters and other information to you, your family and supporters about the running of the home and scheduled events/activities, when you have consented for us to do so.

## Information Sharing

Hallmark Care Homes works in partnership with a number of organisations and will share your information when required to:

- With commissioners and care agencies who are contributing to your care, such as primary care services (GPs), local authorities (social services) hospitals, mental health support services and community services.
- To people with Power of Attorney, or people you have authorised access or when it is in your best interests.
- When legally required to do so, with health and social care regulators (CQC in England and CIW in Wales), safeguarding and DoLs teams and the Health and Safety Executive.
- With trusted providers to host our IT, archiving, email and feedback surveys.

- With team members within Hallmark who provide 'back office' support on key business areas including the People and Performance (HR), Finance, Marketing, Quality & Compliance and Operations teams.
- With our insurer and legal representatives, in order to get support in response to any insurance or legal claim.

## Individual Rights

### Your Rights in relation to your Personal Information

- The right to be informed – covered by this Privacy Notice.
- The right of access – you have the right to make a Subject Access Request asking for information about, or copies of, the information we hold and the way it is used.
- The right to rectification – as soon as you become aware that some information is incorrect let the General Manager know or inform the Data Protection Officer.
- The right to erasure – request the deletion or removal of personal information where there is no compelling reason for its continued processing; (it does not apply to health records).
- The right to restrict processing – you can request that we stop any processing if you do not wish information to be shared.
- The right to data portability – you can request the personal information provided by yourself, be exported into a universal format so it can be imported into another system.
- The right to object – to processing relating to marketing and profiling.
- The right not to be subject to automated decision-making including profiling.

Please note that not all of these rights apply in all circumstances. Further information on your data rights can be found in our Individual Rights (data privacy) policy. A copy of this policy is available on our website [here](#).

### The right to lodge a complaint with a supervisory authority

If you have contacted us but continue to have concerns about the use of your personal data, you can contact the Information Commissioner's Office (ICO). The ICO is the UK's independent body set up to uphold information rights.

The ICO can be contacted through their website: [www.ico.org.uk](http://www.ico.org.uk), or via their helpline on 0303 123 1113.

### Technical and operational security

Hallmark Care Homes takes its duty to protect your personal information and confidentiality seriously and are required to do so by law. We will take all reasonable measures to ensure the confidentiality and security of personal data for which we are responsible, this includes precautions to prevent the loss, misuse or alteration of your personal information.

All Hallmark team members receive regular data protection training, we encrypt all our mobile devices, such as laptops; PC's and tablets and we have a Data and IT Security policy in place.

We have contracts with suppliers, support services and information sharing agreements, where necessary. We have our own internal policies and procedures in place.

Hallmark Care Homes uses computer systems and physical security to ensure that access to your personal information is only allowed on a need to know basis.

## Retention of Personal Information

Hallmark keeps your personal information so that we can care for you, we also retain the information when you leave our care, for an appropriate time. Our 'retention schedule' helps us determine how long to keep records for, in line with guidance from NHS Digital and the NHS Records Management Code of Practice 2016.

Information in care records is kept for a minimum of 8 years after we last provide care to you, and longer for certain medical conditions. We may be required to keep information longer if there has been a legal case against us, or to meet regulatory and legal requirements.

## Contacting Hallmark

If you have any comments or queries about this Privacy Notice, or wish you exercise your 'individual rights' please contact the Data Protection Officer:

- Email: [DPO@hallmarkcarehomes.co.uk](mailto:DPO@hallmarkcarehomes.co.uk)
- Address: Hallmark Care Homes, Kingfisher House, Woodbrook Crescent, Radford Way, Billericay, Essex, CM12 0EQ
- Phone: 01277 655655

## Relatives, supporters and friends policy

### Personal information we hold on you

Personal information is information we collect on you or is about you. Hallmark will request from you and process the following Personal Information:

- Contact details including name, postal address, telephone number, mobile number and email address.
- Bank details/statements (when you pay or contribute towards the cost of a resident's care).
- Contracts (to which you are a party or signatory).
- CCTV recordings when you visit our homes.
- Signing in and out sheets when you visit our homes.
- Photography/video for marketing purposes (where relevant and when you have given consent).

### How do we use your information?

We use the personal information you have given to us, or supplied by others, to fulfil our obligations to our residents; this includes:

- Using your information to keep our residents and team members safe from harm.
- Ensuring that you are contacted in emergency situations or if there are changes in the health of a resident.
- Keeping a record of any individuals who are permitted access to the confidential health information about our residents.
- Responding to letters where you have given feedback on the service we provide.

### The lawful basis under which we process your data

The General Data Protection Regulation and Data Protection Act 2018 requires Hallmark to have a legal basis before we process information with others.

#### The Legal Basis for processing your personal information:

The lawful basis for processing your information is legitimate interest. Hallmark Care Homes would use your information in the case of an emergency. You can opt-out of being an emergency contact by informing the specific General Manager or Hallmark's Data Protection Officer.

The processing is also necessary for us to meet our legal obligations with health and social care regulators, and to meet our contractual obligations with you.

Processing of CCTV data is necessary for the purpose of crime prevention and safety.

### Marketing

We provide newsletters and other information to you about the running of the home and scheduled events/activities, when you have consented for us to do so.



## Information Sharing

We share your personal information under certain circumstances. When we do share information, we use as little as possible, and on a need to know basis.

We share your information with members of the care home team, in order that they can contact you in an emergency, or for further details about your relative in our care.

We will publish your image for marketing purposes, if you are happy for us to do so (with your consent).

Hallmark will not sell or swap your data with any third parties. We will not share your information with any third party for marketing purposes. However, we will share your name and email/postal address with an external company who assist us with the delivery of our regular feedback surveys.

If you are taken ill while on our premises, require emergency treatment, and are unable to provide consent, we will share your personal information with health professionals to ensure you receive appropriate treatment. This will be done under the legal basis of vital interest.

We may be required to share information where we have legal obligation with other authorities (police, social care regulators and organisations).

## Individual Rights

### Your Rights in relation to your Personal Information

- The right to be informed – covered by this Privacy Notice.
- The right of access – you have the right to make a Subject Access Request asking for information about, or copies of, the information we hold and the way it is used.
- The right to rectification – as soon as you become aware that some information is incorrect let the home manager know or inform the Data Protection Officer.
- The right to erasure – request the deletion or removal of personal information where there is no compelling reason for its continued processing; (it does not apply to health records).
- The right to restrict processing – you can request that we stop any processing if you do not wish information to be shared.
- The right to data portability – you can request the personal information provided by yourself, be exported into a universal format so it can be imported into another system.
- The right to object – to processing relating to marketing and profiling.
- The right not to be subject to automated decision-making including profiling.

Please note that not all of these rights apply in all circumstances. Further information on your data rights can be found in our Individual Rights (data privacy) policy. A copy of this policy is available on our website [here](#).

### The right to lodge a complaint with a supervisory authority

If you have contacted us but continue to have concerns about the use of your personal data, you can contact the Information Commissioner's Office (ICO). The ICO is the UK's independent body set up to uphold information rights.

The ICO can be contacted through their website: [www.ico.org.uk](http://www.ico.org.uk), or via their helpline on 0303 123 1113.

## Technical and operational security

Hallmark Care Homes takes its duty to protect your personal information and confidentiality seriously and are required to do so by law. We will take all reasonable measures to ensure the confidentiality and security of personal data for which we are responsible, this includes precautions to prevent the loss, misuse or alteration of your personal information.

All Hallmark team members receive regular data protection training, we encrypt all our mobile devices, such as laptops; PC's and tablets and we have a Data and IT Security policy in place.

We have contracts with suppliers, support services and information sharing agreements, where necessary. We have our own internal policies and procedures in place.

Hallmark Care Homes uses computer systems and physical security to ensure that access to your personal information is only allowed on a need to know basis.

## Retention of Personal Information

Hallmark Care Homes keeps your personal information so that we can care for your relative in our care home, we retain the information for only as long as necessary or when you ask us to change it. Our 'retention schedule' helps us determine how long to keep records for, in line with guidance from NHS Digital and the NHS Records Management Code of Practice 2016.

Hallmark Care Homes keeps your personal information on the record of the resident it relates to. Information in care records is kept for a minimum of 8 years after we last provide care to a resident. If you require emergency medical treatment while visiting our home, we will keep this information for 8 years after that event. We may be required to keep information longer if there has been a legal case against us, or to meet regulatory and legal requirements.

## Contacting Hallmark

If you have any comments or queries about this Privacy Notice, or wish you exercise your 'individual rights' please contact the Data Protection Officer:

- Email: [DPO@hallmarkcarehomes.co.uk](mailto:DPO@hallmarkcarehomes.co.uk)
- Address: Hallmark Care Homes, Kingfisher House, Woodbrook Crescent, Radford Way, Billericay, Essex, CM12 0EQ
- Phone: 01277 655655

## Suppliers Privacy Notice

Your privacy is important to Hallmark Care Homes. This privacy notice provides information about the personal data that Hallmark Care Homes holds on you, as a supplier. Hallmark Care Homes will use your data as described in this notice.

### Personal information we hold on you

Personal information is information we collect on you or is about you. Hallmark will request from you and process the following Personal Information:

- Name
- Contact details
- Company address
- Bank details
- Bank statements
- Invoices
- CCTV recordings (if you visit our homes)
- Signing in and out sheets (if you visit our homes)

### How do we use your information?

- We use the personal information you have given to us to fulfil our contracts with you and to pay you.
- We will also use your information to enquire about, and buy, products/services from you.
- We use CCTV data for the purpose of crime prevention and safety.

### The lawful basis under which we process your data

The General Data Protection Regulation and Data Protection Act 2018 requires Hallmark to have a legal basis before we process information with others.

#### The Legal Basis for processing your personal data:

The legal basis for processing your personal data, as a supplier, is to fulfil the contract we have with you. We may retain your details in case they are of interest in the future, to meet a legitimate interest.

Processing of CCTV data is necessary for the purpose of crime prevention and safety.

### Marketing

We do not use your data for marketing purposes.

### Information Sharing

Hallmark will not sell or swap your data with any third parties. Hallmark will not share your information with any third party for marketing purposes.

### Individual Rights

## Your Rights in relation to your Personal Information

- The right to be informed – covered by this Privacy Notice.
- The right of access – you have the right to make a Subject Access Request asking for information about, or copies of, the information we hold and the way it is used.
- The right to rectification – as soon as you become aware that some information is incorrect let the home manager know or inform the Data Protection Officer.
- The right to erasure – request the deletion or removal of personal information where there is no compelling reason for its continued processing; (it does not apply to health records).
- The right to restrict processing – you can request that we stop any processing if you do not wish information to be shared.
- The right to data portability – you can request the personal information provided by yourself, be exported into a universal format so it can be imported into another system.
- The right to object – to processing relating to marketing and profiling.
- The right not to be subject to automated decision-making including profiling.

Please note that not all of these rights apply in all circumstances. Further information on your data rights can be found in our Individual Rights (data privacy) policy. A copy of this policy is available on our website [here](#).

### The right to lodge a complaint with a supervisory authority

If you have contacted us but continue to have concerns about the use of your personal data, you can contact the Information Commissioner's Office (ICO). The ICO is the UK's independent body set up to uphold information rights.

The ICO can be contacted through their website: [www.ico.org.uk](http://www.ico.org.uk), or via their helpline on 0303 123 1113.

## Technical and operational security

Hallmark Care Homes takes its duty to protect your personal information and confidentiality seriously and are required to do so by law. We will take all reasonable measures to ensure the confidentiality and security of personal data for which we are responsible, this includes precautions to prevent the loss, misuse or alteration of your personal information.

All Hallmark team members receive regular data protection training, we encrypt all our mobile devices, such as laptops; PC's and tablets and we have a Data and IT Security policy in place.

We have contracts with other suppliers, support services and information sharing agreements, where necessary. We have our own internal policies and procedures in place.

Hallmark Care Homes uses computer systems and physical security to ensure that access to your personal information is only allowed on a need to know basis.

We have contracts with suppliers, support services and Information sharing agreement where necessary when we share with other care providers. We have our own internal policies and procedures in place.

Hallmark uses computer systems and physical security to ensure that access to your personal information is only allowed on a need to know basis.

## Retention of Personal Information

Hallmark retains your information for 7 years following the end of our contract or agreement with you, unless we are required by law to hold it for longer.

## Contacting Hallmark

If you have any comments or queries about this Privacy Notice, or wish you exercise your 'individual rights' please contact the Data Protection Officer:

- Email: [DPO@hallmarkcarehomes.co.uk](mailto:DPO@hallmarkcarehomes.co.uk)
- Address: Hallmark Care Homes, Kingfisher House, Woodbrook Crescent, Radford Way, Billericay, Essex, CM12 0EQ
- Phone: 01277 655655

## Website Visitors & Facebook Page Visitors Policy

### Information we collect from you

Personal information is information we collect on you or is about you. Hallmark Care Homes processes the following Personal Information from you:

- Cookie data
- Facebook pixel data

### How do you use the information we collect?

- We use your personal information to work out which of the pages on our website are most popular, helping us plan our strategy.
- We use your personal data to determine the success of our online marketing campaigns via Google Analytics, Google AdWords and Facebook Insights.

We also have a Facebook page. If you use this, please be aware that Facebook uses cookies to track visitors to our business page. These cookies are set even if you do not have a Facebook account. They will track your internet activities on and off Facebook. Despite the fact that only Facebook has access to the data from these cookies and not us, by creating and maintaining a Facebook business page, we are deemed responsible for the cookies being set. We have no way to prevent these cookies being used. We want to be as transparent as possible, so you are aware of the way your data is being used by Facebook.

Facebook privacy policies can be found [here](#).

Hallmark Care Homes' Cookie Policy can be found [here](#).

### The lawful basis under which we process your data

The General Data Protection Regulation and Data Protection Act 2018 requires Hallmark to have a legal basis before we process information with others.

#### The Legal Basis for processing your personal data:

The legal basis for processing your personal data is legitimate interest. Processing is necessary for the purposes of planning our business strategy, which is a legitimate thing for us to do.

### Marketing

We do not use your data for marketing purposes.

### Information Sharing

Hallmark Care Homes uses analytics partners to collect and analyse the data from cookies. We only transfer data outside of the EEA if it is to a country or organisation that is deemed by the EU to have adequate protection of data. For example, US based companies are all signed up to the Privacy Shield. This can be viewed at: <https://www.privacyshield.gov/list>

## Individual Rights

### Your Rights in relation to your Personal Information

- The right to be informed – covered by this Privacy Notice.
- The right of access – you have the right to make a Subject Access Request asking for information about, or copies of, the information we hold and the way it is used.
- The right to rectification – as soon as you become aware that some information is incorrect let the home manager know or inform the Data Protection Officer.
- The right to erasure – request the deletion or removal of personal information where there is no compelling reason for its continued processing; (it does not apply to health records).
- The right to restrict processing – you can request that we stop any processing if you do not wish information to be shared.
- The right to data portability – you can request the personal information provided by yourself, be exported into a universal format so it can be imported into another system.
- The right to object – to processing relating to marketing and profiling.
- The right not to be subject to automated decision-making including profiling.

Please note that not all of these rights apply in all circumstances. Further information on your data rights can be found in our Individual Rights (data privacy) policy. A copy of this policy is available on our website [here](#).

### The right to lodge a complaint with a supervisory authority

If you have contacted us but continue to have concerns about the use of your personal data, you can contact the Information Commissioner's Office (ICO). The ICO is the UK's independent body set up to uphold information rights.

The ICO can be contacted through their website: [www.ico.org.uk](http://www.ico.org.uk), or via their helpline on 0303 123 1113.

### Technical and operational security

Hallmark Care Homes takes its duty to protect your personal information and confidentiality seriously and are required to do so by law. We will take all reasonable measures to ensure the confidentiality and security of personal data for which we are responsible, this includes precautions to prevent the loss, misuse or alteration of your personal information.

All Hallmark team members receive regular data protection training, we encrypt all our mobile devices, such as laptops; PC's and tablets and we have a Data and IT Security policy in place.

We have contracts with other suppliers, support services and information sharing agreements, where necessary. We have our own internal policies and procedures in place.

Hallmark Care Homes uses computer systems and physical security to ensure that access to your personal information is only allowed on a need to know basis.

We have contracts with suppliers, support services and Information sharing agreement where necessary when we share with other care providers. We have our own internal policies and procedures in place.

Hallmark uses computer systems and physical security to ensure that access to your personal information is only allowed on a need to know basis.

## Retention of Personal Information

Hallmark retains your information for 2 years following the end of your last visit to our website.

## Contacting Hallmark

If you have any comments or queries about this Privacy Notice, or wish you exercise your 'individual rights' please contact the Data Protection Officer:

- Email: [DPO@hallmarkcarehomes.co.uk](mailto:DPO@hallmarkcarehomes.co.uk)
- Address: Hallmark Care Homes, Kingfisher House, Woodbrook Crescent, Radford Way, Billericay, Essex, CM12 0EQ
- Phone: 01277 655655



## Enquirers Privacy Notice

Your privacy is important to Hallmark Care Homes. This privacy notice provides information about the personal data that we hold on you, as an enquirer. Hallmark Care Homes will use your data as described in this notice.

### Information we collect from you

Personal information is information we collect on you or is about you. Hallmark Care Homes will process the following Personal Information about you:

- Contact details including name, telephone number, postal address and email address.
- Signing in and out sheets (if you visit our homes).
- CCTV recordings (if you visit our homes).

### How do you use your information?

- We use your personal information you have given to us for marketing purposes, to inform you of services we believe you may be interested in.
- We also use your details to respond to your enquiry.

### The lawful basis under which we process your data

The General Data Protection Regulation and Data Protection Act 2018 requires Hallmark Care Homes to have a legal basis before we process information with others.

#### The Legal Basis for this processing:

The legal basis for processing your contact information, as an enquirer, is legitimate interest. Processing of CCTV data is necessary for the purpose of crime prevention and safety.

### Marketing

We will use your information to inform you of services that we believe you may be interested in via email. Opt out and preference change links are on all email contacts we send you or others.

### Information Sharing

We use a number of companies that process data for marketing purposes however we have ensured that all processors we use adhere to the GDPR. We only transfer data outside of the EEA if it is to a country or organisation that is deemed by the EU to have adequate protection of data. For example, US based companies are all signed up to the Privacy Shield. This can be viewed at: <https://www.privacyshield.gov/list>.

### Individual Rights

#### Your Rights in relation to your Personal Information

- The right to be informed – covered by this Privacy Notice.
- The right of access – you have the right to make a Subject Access Request asking for information about, or copies of, the information we hold and the way it is used.

- The right to rectification – as soon as you become aware that some information is incorrect let the home manager know or inform the Data Protection Officer.
- The right to erasure – request the deletion or removal of personal information where there is no compelling reason for its continued processing; (it does not apply to health records).
- The right to restrict processing – you can request that we stop any processing if you do not wish information to be shared.
- The right to data portability – you can request the personal information provided by yourself, be exported into a universal format so it can be imported into another system.
- The right to object – to processing relating to marketing and profiling.
- The right not to be subject to automated decision-making including profiling.

Please note that not all of these rights apply in all circumstances. Further information on your data rights can be found in our Individual Rights (data privacy) policy. A copy of this policy is available on our website [here](#).

### The right to lodge a complaint with a supervisory authority

If you have contacted us but continue to have concerns about the use of your personal data, you can contact the Information Commissioner's Office (ICO). The ICO is the UK's independent body set up to uphold information rights.

The ICO can be contacted through their website: [www.ico.org.uk](http://www.ico.org.uk), or via their helpline on 0303 123 1113.

### Technical and operational security

Hallmark Care Homes takes its duty to protect your personal information and confidentiality seriously and are required to do so by law. We will take all reasonable measures to ensure the confidentiality and security of personal data for which we are responsible, this includes precautions to prevent the loss, misuse or alteration of your personal information.

All Hallmark team members receive regular data protection training, we encrypt all our mobile devices, such as laptops; PC's and tablets and we have a Data and IT Security policy in place.

We have contracts with other suppliers, support services and information sharing agreements, where necessary. We have our own internal policies and procedures in place.

Hallmark Care Homes uses computer systems and physical security to ensure that access to your personal information is only allowed on a need to know basis.

We have contracts with suppliers, support services and Information sharing agreement where necessary when we share with other care providers. We have our own internal policies and procedures in place.

Hallmark uses computer systems and physical security to ensure that access to your personal information is only allowed on a need to know basis.

### Retention of Personal Information

Hallmark retains your information for a year after your enquiry, unless we are required by law to hold it for longer.

## Contacting Hallmark

If you have any comments or queries about this Privacy Notice, or wish you exercise your 'individual rights' please contact the Data Protection Officer:

- Email: [DPO@hallmarkcarehomes.co.uk](mailto:DPO@hallmarkcarehomes.co.uk)
- Address: Hallmark Care Homes, Kingfisher House, Woodbrook Crescent, Radford Way, Billericay, Essex, CM12 0EQ
- Phone: 01277 655655