

# Hallmark Care Homes Group Holdings Limited and subsidiaries - Privacy Notice

This Privacy Notice provides details of the personal data we collect from you, what we do with it, how you might access it and who it might be shared with.

## Our Contact Information (Data Controller)

Hallmark Care Homes Group Holdings Limited and subsidiaries  
Hallmark Care Homes  
2 Kingfisher House, Woodbrook Crescent, Radford Way, Billericay, Essex  
CM12 0EQ  
United Kingdom  
Telephone: +441277655655  
Company Email: info@hallmarkcarehomes.co.uk

## What we do with your personal data

We process personal data only for the purpose for which they are collected. The purpose is dependent on whether you use only our website, or additionally, our services. If you use our services you are required to register and we collect your personal data. We use this personal data for the provision of the service or the performance of the contract. We may use your personal data for other similar purposes, including marketing and communications, but that will only occur in the case we have your consent or another legal justification for doing so.

From our **Prospective Team Members** we process and retain personal data for the following purposes and periods, with the applicable legal basis.

Processing purpose	Legal basis	Retention period
Recruitment	6(1)(b) - steps are required prior to a contract with the data subject	2 years, if unsuccessful or 7 years after employment has ended if successful.
Development of recruitment process /creation of induction and future development plan	6(1)(f) - it's in our legitimate interest (Employment data processing)	If successful will be retained for 7 years after employment ends. If unsuccessful will be held for two years.

From our **Residents** we process and retain personal data for the following purposes and periods, with the applicable legal basis.

Processing purpose	Legal basis	Retention period
Debt management	6(1)(b) - we have a contract with the data subject	Until tax or other retention period expires
Invoicing and payment collection	6(1)(b) - we have a contract with the data subject	Until tax or other retention period expires
Contract management	6(1)(b) - we have a contract with the data subject	Until tax or other retention period expires
Business operations and due diligence	6(1)(f) - it's in our legitimate interest (Business operations and due Diligence)	Until tax or other retention period expires
Legal and regulatory compliance	6(1)(c) - we have to comply with a legal obligation	Until tax or other retention period expires

PR	6(1)(a) - we have the data subject's consent	1 year for annual events, or 2 years otherwise.
Legal and regulatory compliance	6(1)(f) - it's in our legitimate interest (Legal and regulatory compliance)	7 years after the resident's death or discharge from one of our care homes.
Video surveillance	6(1)(f) - it's in our legitimate interest (Crime prevention and security)	30 days
Accident and incident management	6(1)(c) - we have to comply with a legal obligation	Non-serious 10 years. Serious 20 years.
Identification	6(1)(c) - we have to comply with a legal obligation	7 years following death or discharge.
Delivery of health and social care	6(1)(c) - we have to comply with a legal obligation	7 years following death or discharge.
Legal and regulatory compliance	6(1)(c) - we have to comply with a legal obligation	7 years following death or discharge.
Stakeholder engagement	6(1)(f) - it's in our legitimate interest (Meetings with stakeholders)	2 years
Feedback investigation and management	6(1)(c) - we have to comply with a legal obligation	Category 1 & 2 feedback to be kept for 8 -years. Category 3 feedback - two years following resolution. Positive feedback - two years following receipt
COVID-19 risk mitigation	6(1)(e) - we are carrying out tasks in the public interest	For 6 months following the official end of the COVID-19 pandemic.
Site management and security	6(1)(f) - it's in our legitimate interest (Night security checks)	2 years
Health data sharing with GP services (at Kew House only)	6(1)(e) - we are carrying out tasks in the public interest	7 years following death or discharge
Resident audio monitoring (at Chamberlain Court, Henley Manor, Angmering Grange, Midford Manor and Willingdon Park Manor only)	6(1)(a) - we have the data subject's consent	3 months

From our **Relatives and friends** we process and retain personal data for the following purposes and periods, with the applicable legal basis.

Processing purpose	Legal basis	Retention period
PR	6(1)(a) - we have the data subject's consent	1 year for annual events, or 2 years otherwise.
Legal and regulatory compliance	6(1)(f) - it's in our legitimate interest (Legal and regulatory compliance)	7 years after the resident has passed or away or left the home.
Video surveillance	6(1)(f) - it's in our legitimate interest (Crime prevention and security)	30 days
Accident and incident management	6(1)(c) - we have to comply with a legal obligation	Non-serious 10 years. Serious 20 years.
Notification in emergency	6(1)(f) - it's in our legitimate	7 years following the death or discharge of the resident.

	interest (To contact emergency contacts in an emergency)	
Stakeholder engagement	6(1)(c) - we have to comply with a legal obligation	2 years
Feedback investigation and management	6(1)(c) - we have to comply with a legal obligation	Category 1 & 2 feedback to be kept for 8 -years. Category 3 feedback - two years following resolution. Positive feedback - two years following receipt.

From our **Care home visitors** we process and retain personal data for the following purposes and periods, with the applicable legal basis.

Processing purpose	Legal basis	Retention period
Site management and security	6(1)(f) - it's in our legitimate interest (Business operations and due Diligence)	2 years from the end of the calendar year the data was collected.
Video surveillance	6(1)(f) - it's in our legitimate interest (Crime prevention and security)	30 days
Accident and incident management	6(1)(c) - we have to comply with a legal obligation	Non-serious 10 years. Serious 20 years.
COVID-19 risk mitigation	6(1)(e) - we are carrying out tasks in the public interest	For 6 months following the official end of the COVID-19 pandemic.

From our **Volunteers** we process and retain personal data for the following purposes and periods, with the applicable legal basis.

Processing purpose	Legal basis	Retention period
Legal and regulatory compliance	6(1)(c) - we have to comply with a legal obligation	Category 1 & 2 feedback to be kept for 8 -years. Category 3 feedback - two years following resolution Positive feedback - two years following receipt.
Volunteer recruitment and ongoing volunteering	6(1)(c) - we have to comply with a legal obligation	7 years after volunteering comes to an end.
Feedback investigation and management	6(1)(c) - we have to comply with a legal obligation	Category 1 & 2 feedback to be kept for 8 -years. Category 3 feedback - two years following resolution. Positive feedback - two years following receipt.

From our **Agency staff** we process and retain personal data for the following purposes and periods, with the applicable legal basis.

Processing purpose	Legal basis	Retention period
Legal and regulatory compliance	6(1)(c) - we have to comply with a legal obligation	7 years after last agency shift.

From our **Funding Authority** we process and retain personal data for the following purposes and periods, with the applicable legal basis.

Processing purpose	Legal basis	Retention period
Contract management	6(1)(b) - steps are required prior to a contract with the data subject	Until tax or other retention period expires

From our **Fee payers** we process and retain personal data for the following purposes and periods, with the applicable legal basis.

Processing purpose	Legal basis	Retention period
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Debt management	6(1)(b) - we have a contract with the data subject	Until tax or other retention period expires
Invoicing and payment collection	6(1)(b) - we have a contract with the data subject	Until tax or other retention period expires
Contract management	6(1)(b) - we have a contract with the data subject	Until tax or other retention period expires

From our **Website visitors** we process and retain personal data for the following purposes and periods, with the applicable legal basis.

Processing purpose	Legal basis	Retention period
Communications, marketing and intelligence	6(1)(f) - it's in our legitimate interest (Communications, marketing and intelligence)	2 years from the last visit to the website.

From our **Social media visitors** we process and retain personal data for the following purposes and periods, with the applicable legal basis.

Processing purpose	Legal basis	Retention period
Communications, marketing and intelligence	6(1)(f) - it's in our legitimate interest (Communications, marketing and intelligence)	2 years from the last visit to one of our social media pages.

From our **Enquirers** we process and retain personal data for the following purposes and periods, with the applicable legal basis.

Processing purpose	Legal basis	Retention period
Enquiry management	6(1)(f) - it's in our legitimate interest (Business operations and due Diligence)	7 years after the last contact
Communications, marketing and intelligence	6(1)(a) - we have the data subject's consent	2 years

From our **External business development contacts** we process and retain personal data for the following purposes and periods, with the applicable legal basis.

Processing purpose	Legal basis	Retention period
External business development	6(1)(f) - it's in our legitimate interest (Communications, marketing and intelligence)	7 years after last contact
Communications, marketing and intelligence	6(1)(a) - we have the data subject's consent	2 years

From our **External contractors** we process and retain personal data for the following purposes and periods, with the applicable legal basis.

Processing purpose	Legal basis	Retention period
Legal and regulatory compliance	6(1)(c) - we have to comply with a legal obligation	1 month after the contract ends or 3 years after they last completed work for us (for none time bound contracts).

From our **Data subjects** we process and retain personal data for the following purposes and periods, with the applicable legal basis.

Processing purpose	Legal basis	Retention period
Compliance with the UK GDPR	6(1)(c) - we have to comply with a legal obligation	7 years from the request/incident.

From our **Suppliers** we process and retain personal data for the following purposes and periods, with the applicable legal basis.

<b>Processing purpose</b>	<b>Legal basis</b>	<b>Retention period</b>
Business operations and due diligence	6(1)(b) - we have a contract with the data subject	Until tax or other retention period expires

## What personal data do we collect?

The personal data we collect depends on whether you just visit our website or use our services. If you visit our website, you do not need to provide us with any personal data. However, your browser transmits some data automatically, such as the date and time of retrieval of one of our web pages, your browser type and settings, your operating system, the last web page you visited, the data transmitted and the access status, and your IP address.

If you use our services, personal data is required to fulfill the requirements of a contractual or service relationship, which may exist between you and our organisation.

We collect:

- Formal identification documents
- Employment references
- Professional body registration/ID
- Job role
- Right to work documentation
- Personality profile/assessment
- Employment History
- Visual Images
- Education History
- National Insurance number
- Address
- Date of birth and age
- Lasting Power of Attorney details
- Probate information
- Contact details
- Signature
- Life history
- Audio recordings (in bedroom only)
- Family
- Financial Details
- Identification Number
- Location Information
- Name
- Photographs together with Identifiers
- Banking Details
- Digital Images
- Feedback
- Vehicle registration
- Hours worked and rate of pay/salary
- Online Identifiers
- Method statement
- Telephone contact details
- Credit History

We collect special category personal data and do so under the following legal basis:

- Criminal record data
  - 9(2)(h) - For purposes of medicine, health or social care or health professionals
- Health
  - 9(2)(h) - For purposes of medicine, health or social care or health professionals
  - 9(2)(b) - For employment, social security or social protection law

- 9(2)(i) - For reasons of public interest in the area of public health
- Racial or Ethnic Origin
  - 9(2)(b) - For employment, social security or social protection law
- COVID test details and result
  - 9(2)(i) - For reasons of public interest in the area of public health
- Religious or Philosophical beliefs
  - 9(2)(h) - For purposes of medicine, health or social care or health professionals
- Sex life or Sexual orientation
  - 9(2)(h) - For purposes of medicine, health or social care or health professionals

## We collect your personal data from the following indirect sources

Data subject type	Personal data type	Indirect source name
Prospective Team Members	National Insurance number	Recruitment agency
Volunteers	Hours worked and rate of pay/salary	Hallmark Care Homes
Prospective Team Members	Hours worked and rate of pay/salary	Hallmark Care Homes
Prospective Team Members	Address	Recruitment agency
External business development contacts	Address	Social media sites
Prospective Team Members	Date of birth and age	Recruitment agency
External business development contacts	Contact details	Social media sites
Prospective Team Members	Contact details	Recruitment agency
Prospective Team Members	Contact details	Social media sites
External business development contacts	Contact details	Social media sites
Volunteers	Employment references	Previous employers
Prospective Team Members	Employment references	Previous employer
Prospective Team Members	Employment references	Recruitment agency
Agency staff	Employment references	Agency
Volunteers	Job role	Hallmark Care Homes
Prospective Team Members	Job role	Hallmark Care Homes
Prospective Team Members	Personality profile /assessment	Savran
Prospective Team Members	Employment History	Recruitment agency
Agency staff	Employment History	Agency
Agency staff	Name	Agency
Prospective Team Members	Name	Social media sites
External business development contacts	Name	Social media sites
Prospective Team Members	Name	Recruitment agency
Social media visitors	Online Identifiers	Social media sites
Website visitors	Online Identifiers	Website analytics agency

Prospective Team Members	Telephone contact details	Recruitment agency
External business development contacts	Telephone contact details	Social media sites
Care home visitors	Visual Images	CCTV system
External contractors	Visual Images	CCTV system
Prospective Team Members	Visual Images	CCTV system
Residents	Visual Images	CCTV system
Relatives and friends	Visual Images	CCTV system
Prospective Team Members	Education History	Recruitment agency
Agency staff	Education History	Agency
<b>Data subject type</b>	<b>Special category personal data type</b>	<b>Indirect source name</b>
Volunteers	Criminal record data	First Advantage
External contractors	Criminal record data	First Advantage
Prospective Team Members	Criminal record data	First Advantage
Residents	COVID test details and result	NHS

## Who might we share your personal data with?

To maintain and improve our services, your personal data may need to be shared with or disclosed to service providers, other Controllers or, in some cases, public authorities. We may be mandated to disclose your personal data in response to requests from a court, police services or other regulatory bodies. Where feasible, we will consult with you prior to making such disclosure and, in order to protect your privacy, we will ensure that we will disclose only the minimum amount of your information necessary for the required purpose.

### We transfer personal data to the following organisations and countries:

Data subject type	Organisation name	Type	Country
Prospective Team Members	First Advantage	Controller	United Kingdom
Prospective Team Members	Insurance provider and broker	Controller	United Kingdom
Prospective Team Members	Legal advisors	Controller	United Kingdom
Prospective Team Members	Occupational Health provider	Controller	United Kingdom
Prospective Team Members	Reach ATS	Processor	United Kingdom
Prospective Team Members	Savran	Controller	United Kingdom
Residents	Advanced	Processor	Netherlands
Residents	Ally Labs	Processor	United Kingdom
Residents	Bottomline	Processor	United Kingdom
Residents	CCTV system	Processor	United Kingdom
Residents	Department of Health and Social Care (DHSC)	Controller	United Kingdom
Residents	External healthcare professionals	Controller	United Kingdom

Residents	External regulators (CQC, CIW, HSE, ICO, Safeguarding team, DBS)	Controller	United Kingdom
Residents	Insurance provider and broker	Controller	United Kingdom
Residents	KareInn	Processor	United Kingdom
Residents	Law enforcement body	Controller	United Kingdom
Residents	Legal advisors	Controller	United Kingdom
Residents	Local/funding Authority	Controller	United Kingdom
Residents	MediaBase Direct	Processor	United Kingdom
Residents	My Business Cloud Solution	Processor	United Kingdom
Residents	Photographers	Processor	United Kingdom
Residents	Radar	Processor	United Kingdom
Residents	Relatives and supporters	Controller	United Kingdom
Residents	Relish	Processor	United Kingdom
Residents	Safety Culture	Processor	United Kingdom
Residents	Sage	Processor	United Kingdom
Residents	Web and design agency	Processor	United Kingdom
Residents	Your Care Consultancy	Processor	United Kingdom
Relatives and friends	Advanced	Processor	Netherlands
Relatives and friends	CCTV system	Processor	United Kingdom
Relatives and friends	External healthcare professionals	Controller	United Kingdom
Relatives and friends	External regulators (CQC, CIW, HSE, ICO, Safeguarding team, DBS)	Controller	United Kingdom
Relatives and friends	Insurance provider and broker	Controller	United Kingdom
Relatives and friends	KareInn	Processor	United Kingdom
Relatives and friends	Law enforcement body	Controller	United Kingdom
Relatives and friends	Legal advisors	Controller	United Kingdom
Relatives and friends	Local/funding Authority	Controller	United Kingdom
Relatives and friends	Photographers	Processor	United Kingdom
Relatives and friends	Radar	Processor	United Kingdom
Relatives and friends	Safety Culture	Processor	United Kingdom
Relatives and friends	Web and design agency	Processor	United Kingdom
Care home visitors	Advanced	Processor	Netherlands
Care home visitors	CCTV system	Processor	United Kingdom
Care home visitors	Department of Health and Social Care (DHSC)	Controller	United Kingdom
Care home visitors	External regulators (CQC,	Controller	United Kingdom



	CIW, HSE, ICO, Safeguarding team, DBS)		
Care home visitors	Insurance provider and broker	Controller	United Kingdom
Care home visitors	KareInn	Processor	United Kingdom
Care home visitors	Law enforcement body	Controller	United Kingdom
Care home visitors	Legal advisors	Controller	United Kingdom
Care home visitors	Local/funding Authority	Controller	United Kingdom
Care home visitors	MediaBase Direct	Processor	United Kingdom
Care home visitors	Radar	Processor	United Kingdom
Volunteers	Advanced	Processor	Netherlands
Volunteers	External regulators (CQC, CIW, HSE, ICO, Safeguarding team, DBS)	Controller	United Kingdom
Volunteers	Insurance provider and broker	Controller	United Kingdom
Volunteers	Law enforcement body	Controller	United Kingdom
Volunteers	Legal advisors	Controller	United Kingdom
Volunteers	Radar	Processor	United Kingdom
Agency staff	External regulators (CQC, CIW, HSE, ICO, Safeguarding team, DBS)	Controller	United Kingdom
Agency staff	Insurance provider and broker	Controller	United Kingdom
Fee payers	Bottomline	Processor	United Kingdom
Fee payers	Insurance provider and broker	Controller	United Kingdom
Fee payers	Legal advisors	Controller	United Kingdom
Fee payers	Local/funding Authority	Controller	United Kingdom
Fee payers	My Business Cloud Solution	Processor	United Kingdom
Fee payers	Sage	Processor	United Kingdom
Website visitors	Analytical partners	Processor	United Kingdom
Social media visitors	Analytical partners	Processor	United Kingdom
Enquirers	Local/funding Authority	Controller	United Kingdom
Enquirers	Sherpa	Processor	Ireland
External business development contacts	Sherpa	Processor	Ireland
External contractors	External regulators (CQC, CIW, HSE, ICO, Safeguarding team, DBS)	Controller	United Kingdom
External contractors	MediaBase Direct	Processor	United Kingdom
Data subjects	External regulators (CQC, CIW, HSE, ICO, Safeguarding	Controller	United Kingdom

	team, DBS)		
Data subjects	PrivIQ	Processor	United Kingdom
Suppliers	Barclays Bank	Controller	United Kingdom
Suppliers	Legal advisors	Controller	United Kingdom
Suppliers	My Business Cloud Solution	Processor	United Kingdom
Suppliers	Sage	Processor	United Kingdom

When a Processor or Controller is in a country outside the UK, we apply the necessary safeguards which may include, confirming whether the UK approves of transfers to the country, whether we need to use the UK's model contracts or, if the transfer is internal to our organisation, commitment to Binding Corporate Rules. Details of these safeguards may be obtained by contacting us directly.

## How do we look after personal data?

We limit the amount of personal data collected only to what is fit for the purpose, as described above. We restrict, secure and control all of our information assets against unauthorised access, damage, loss or destruction; whether physical or electronic. We retain personal data only for as long as is described above, to respond to your requests, or longer if required by law. If we retain your personal data for historical or statistical purposes we ensure that the personal data cannot be used further. While in our possession, together with your assistance, we try to maintain the accuracy of your personal data.

## How can you access your personal data?

You have the right to request access to any of your personal data we may hold. If any of that information is incorrect, you may request that we correct it. If we are improperly using your information, you may request that we stop using it or even delete it completely.

**If you would like to make a request to see what personal data of yours we might hold, you may make a request from our company website.**

Where you have previously given your consent to process your personal data, you also have the right to request that we port or transfer your personal data to a different service provider or to yourself, if you so wish.

Where it may have been necessary to get your consent to use your personal data, at any moment, you have the right to withdraw that consent. If you withdraw your consent, we will cease using your personal data without affecting the lawfulness of processing based on consent before your withdrawal.

## Our Data Protection Officer

Nick Banister-Dudley  
 dpo@hallmarkcarehomes.co.uk  
 Telephone: +01277 655655

## Information Commissioner

You have the right to lodge a complaint with the Information Commissioner. See contact details below.

Information Commissioner's Office  
 Water Lane, Wycliffe House  
 Wilmslow - Cheshire SK9 5AF  
 United Kingdom  
 casework@ico.org.uk  
 +44 303 123 3113  
 www.ico.org.uk