

## GENERAL DATA PROTECTION PRIVACY NOTICE

### Introduction

The EU General Data Protection Regulation (GDPR) replaces the 1995 EU Data Protection Directive. The GDPR strengthens the rights that individuals have regarding personal data relating to them and seeks to harmonize data protection laws across Europe, regardless of where that data is processed.

Minster Care Group Ltd and its subsidiaries and associates (Minster) is committed to protecting the rights and freedoms of data subjects and safely and securely processing their data in accordance with our legal obligations.

We hold personal data about our employees, clients, suppliers and other individuals for a variety of business purposes.

This notice sets out how we collect and use personal data and seek to protect personal data.

### Data Controller and contact information

Minster Care Group Ltd and subsidiary and associate companies are the data controllers. Enquiries can be directed to Mr John Alflatt (Finance Director and Company Secretary) , [john@minstercaregroup.co.uk](mailto:john@minstercaregroup.co.uk) or Mr Amit Shah (Data Protection Officer): [amit@minstercaregroup.co.uk](mailto:amit@minstercaregroup.co.uk)

### Reasons/purposes for processing information

We process personal information to enable us to provide residential healthcare services; maintain our own accounts and records; to support and manage our employees. We may also process personal information using CCTV systems to monitor and collect visual images for security and the prevention and detection of crime or by using audio recording equipment to record telephone calls for record or training purposes.

We may collect and process information relevant to the above reasons/purposes. This information may include:

- personal details including names, addresses, telephone numbers email addresses, dates of birth, NHS numbers, National Insurance numbers.
- family details
- lifestyle and social circumstances
- financial details
- education and employment details
- visual images, personal appearance and behaviour

We may also process sensitive classes of information that may include:

- physical or mental health details
- racial or ethnic origin
- religious or other beliefs
- offences including alleged offences
- criminal proceedings, outcomes and sentences

## Who the information is processed about

We process personal information about:

- residents/service users/patients
- personal representatives of the above
- complainants
- enquirers
- individuals captured by CCTV images
- offenders and suspected offenders
- employees and their next of kin

## Who information is obtained from

The information we hold is obtained from:

- The subjects themselves
- Their next of kin or personal representatives
- Professional bodies engaged to represent the subject
- Other data controllers for whom we are processing data (eg. Local Authorities)
- Government agencies providing data relevant to our business

## Who the information may be shared with

We sometimes need to share the personal information we process with the individual and also with other organisations. Where this is necessary we are required to comply with all aspects of the Data Protection Act (DPA). The types of organisations we may need to share some of the personal information we process with for one or more reasons may include:

- healthcare professionals, social and welfare organisations with whom or for whom we carry out legitimate business
- The Care Quality Commission or other legitimate regulators of our business
- family, associates and representatives of the person whose personal data we are processing
- central and local government
- suppliers and service providers
- employment and recruitment organisations
- credit reference agencies
- debt collection and tracing agencies
- business associates and other professional advisers
- financial organisations
- current, past or prospective employers
- educators and examining bodies
- people making an enquiry or complaint
- police forces and security organisations
- data processors with whom we contract (eg. Payroll service providers)

## Rights of individuals

Individuals have rights to their data which we must respect and comply with to the best of our ability. We must ensure individuals can exercise their rights in the following ways:

### 1. Right to be informed



- Providing privacy notices which are concise, transparent, intelligible and easily accessible, free of charge, that are written in clear and plain language, particularly if aimed at children.
- Keeping a record of how we use personal data to demonstrate compliance with the need for accountability and transparency.

## **2. Right of access**

- Enabling individuals to access their personal data and supplementary information
- Allowing individuals to be aware of and verify the lawfulness of the processing activities

## **3. Right to rectification**

- We must rectify or amend the personal data of the individual if requested because it is inaccurate or incomplete.

## **4. Right to erasure**

- We must delete or remove an individual's data if requested and there is no compelling reason for its continued processing.

## **5. Right to restrict processing**

- We must comply with any request to restrict, block, or otherwise suppress the processing of personal data.
- We are permitted to store personal data if it has been restricted, but not process it further. We must retain enough data to ensure the right to restriction is respected in the future.

## **6. Right to data portability**

- We must provide individuals with their data so that they can reuse it for their own purposes or across different services.
- We must provide it in a commonly used, machine-readable format, and send it directly to another controller if requested.

## **7. Right to object**

- We must respect the right of an individual to object to data processing based on legitimate interest or the performance of a public interest task.
- We must respect the right of an individual to object to direct marketing, including profiling.
- We must respect the right of an individual to object to processing their data for scientific and historical research and statistics.

## **8. Rights in relation to automated decision making and profiling**

- We must respect the rights of individuals in relation to automated decision making and profiling.
- Individuals retain their right to object to such automated processing, have the rationale explained to them, and request human intervention.

## **Data retention**

- We must retain personal data for no longer than is necessary. What is necessary will depend on the circumstances of each case, taking into account the reasons that the personal data was obtained, but should be determined in a manner consistent with data retention guidelines.

## **Subject Access Requests**

An individual has the right to receive confirmation that their data is being processed, access to their personal data and supplementary information.



We must provide an individual with a copy of the information they request, free of charge. This must occur without delay, ideally within one month of receipt. We endeavour to provide data subjects access to their information in commonly used electronic formats, and where possible, provide direct access to the information through a remote accessed secure system.

If complying with the request is complex or numerous, the deadline can be extended by two months, but the individual must be informed within one month.

We can refuse to respond to certain requests, and can, in circumstances of the request being manifestly unfounded or excessive, charge a fee. If the request is for a large quantity of data, we can request the individual specify the information they are requesting.

### **Right to lodge a complaint**

You have the right to complain to the Information Commissioners Office on telephone helpline 0303 123 1113 or to Minster Care Group, 1 Grove Hill Road, Harrow, HA1 3AA or by email to one of the contact email addresses above or via our website at [www.minstercaregroup.co.uk](http://www.minstercaregroup.co.uk)

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