

Santhem Care Limited - 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)

Santhem Care Limited
Hallmark Care Homes, Kingfisher House, 2 Woodbrook Crescent
Billericay, Essex
CM12 0EQ
United Kingdom
Telephone: +441277508999
Company Email: enquiries@santhemcare.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 **Suppliers** we process and retain personal data for the following purposes and periods, with the applicable legal basis.

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

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

Processing purpose	Legal basis	Retention period
Accident and incident management	6(1)(c) - we have to comply with a legal obligation	Non-serious 10 years. Serious 20 years.
Identity verification	6(1)(c) - we have to comply with a legal obligation	Until contract completed
Delivery of health and social care	6(1)(c) - we have to comply with a legal obligation	7 years after contracts ends.
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.
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
Legal and regulatory compliance	6(1)(f) - it's in our legitimate interest (Legal and regulatory compliance)	7 years after the contract ending.

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
---------------------------------------	---	---

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 **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 (Enquiry management)	7 years after the last contact
Communications, marketing and intelligence	6(1)(a) - we have the data subject's consent	2 years

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 after request/event.

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

Processing purpose	Legal basis	Retention period
Notification in an emergency	6(1)(f) - it's in our legitimate interest (Notifying relatives in an emergency)	7 years after our contract with the client ends.

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:

- Address
- Banking Details
- Contact details
- Education History

- Employment History
- Employment references
- Hours worked/rate of pay
- Formal identification documents
- Job role
- Identification Number
- Name
- Professional body registration/ID
- Right to work documentation
- Signature
- Telephone contact details
- Visual Images
- Personality profile/assessment
- Date of birth/age
- Family
- Digital Images
- Location Information
- Photographs together with Identifiers
- Feedback
- Financial Details
- Credit History

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

- Health
 - 9(2)(h) - For purposes of medicine, health or social care or health professionals
- Criminal record data
 - 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	Address	Recruitment agency
Prospective team members	Contact details	Recruitment agency
Prospective team members	Employment references	Previous employer
Prospective team members	Employment references	Recruitment agency
Prospective team members	Hours worked/rate of pay	Santhem Care
Prospective team members	Job role	Santhem Care
Prospective team members	Personality profile /assessment	Savran
Prospective team members	Employment History	Recruitment agency
Prospective team members	Telephone contact details	Recruitment agency
Prospective team members	Education History	Recruitment agency

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
Clients	Barclays Bank	Controller	United Kingdom
Clients	Birdie	Processor	United Kingdom
Clients	Bottomline	Processor	United Kingdom
Clients	CarePlanner	Processor	Ireland
Clients	External healthcare professionals	Controller	United Kingdom
Clients	External regulators (CQC, HSE, ICO, Safeguarding team, DBS)	Controller	United Kingdom
Clients	Insurance provider and broker	Controller	United Kingdom
Clients	Legal advisors	Controller	United Kingdom
Clients	Local Authority	Controller	United Kingdom
Clients	Microsoft	Processor	Austria
Clients	My Business Cloud Solution	Processor	United Kingdom
Clients	Relatives and supporters	Controller	United Kingdom
Prospective team members	Advanced	Processor	Netherlands
Prospective team members	CarePlanner	Processor	Ireland
Prospective team members	First Advantage	Controller	United Kingdom
Prospective team members	Microsoft	Processor	Austria
Prospective team members	Reach ATS	Processor	United Kingdom
Prospective team members	Savran	Controller	United Kingdom
Enquirers	CarePlanner	Processor	Ireland
Enquirers	External healthcare professionals	Controller	United Kingdom
Enquirers	Local Authority	Controller	United Kingdom
Enquirers	Microsoft	Processor	Austria
Enquirers	Sherpa	Processor	Ireland
Data subjects	External regulators (CQC, HSE, ICO, Safeguarding team, DBS)	Controller	United Kingdom
Data subjects	PrivIQ	Processor	United Kingdom
Relatives	Birdie	Processor	United Kingdom
Relatives	CarePlanner	Processor	Ireland
Relatives	Microsoft	Processor	Austria
Suppliers	Barclays Bank	Controller	United Kingdom
Suppliers	My Business Cloud Solution	Processor	United Kingdom
Suppliers	Paperless	Processor	Malta
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: +01277655655

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