

Santhem Residences (Shenfield) 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 Residences (Shenfield) Limited
 2 Kingfisher House, Woodbrook Crescent,
 Radford Way, Billericay, Essex
 CM12 0EQ
 United Kingdom
 Telephone: +441277508999
 Company Email: enquiries@santhemresidences.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 | If successful will be retained for 7 years after the employments ends. If unsuccessful will be held for two years. |
| 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. |
| Employee Recruitment and Employment | 6(1)(a) - we have the data subject's consent | 3 years |

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 |
|---------------------------------------|---|---|
| Video surveillance | 6(1)(f) - it's in our legitimate interest (Crime prevention and safety) | 30 days |
| Accident and incident management | 6(1)(c) - we have to comply with a legal obligation | Non-serious 10 years. Serious 20 years. |
| Feedback investigation and management | 6(1)(f) - it's in our legitimate interest (Business operations and due Diligence) | 2 years after resolution. |
| 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 |

| | | |
|---|---|---|
| | subject | |
| PR | 6(1)(a) - we have the data subject's consent | 1 year for annual events, or 2 years otherwise. |
| User safety (when using the Wellness Suite) | 6(1)(f) - it's in our legitimate interest (User safety) | Data will be held for 6 months after the data subject last uses the Wellness Suite. |
| Personalised wellness experience | 6(1)(a) - we have the data subject's consent | Data will be held for 6 months after the data subject last uses the Wellness Suite. |

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 the request/breach. |

From our **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 (Site management and security) | 2 years |
| Video surveillance | 6(1)(f) - it's in our legitimate interest (Crime prevention and safety) | 30 days. |
| Accident and incident management | 6(1)(c) - we have to comply with a legal obligation | Non-serious 10 years. Serious 20 years. |

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 **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)(a) - we have the data subject's consent | 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)(a) - we have the data subject's consent | 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 (Enquiry and sales | 7 years after the last |

| | | |
|--|--|---------|
| | process) | 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 | Until consent is withdrawn. |

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:

- Contact details
- Formal identification documents
- Name
- Telephone contact details
- Banking Details
- Date of birth/age
- Education History
- Employment History
- Identification Number
- Employment references
- Signature
- Family
- Job role
- Hours worked and rate of pay/salary
- Photographs together with Identifiers
- Right to work documentation
- Personality profile/assessment
- Visual Images
- Feedback
- Financial Details
- Vehicle registration
- Credit History
- Online Identifiers

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

- Criminal record data
 - 9(2)(a) - Explicit consent of the data subject
- Health
 - 9(2)(b) - For employment, social security or social protection law
 - 9(2)(g) - For reasons of substantial public interest
 - 9(2)(f) - For legal claims or courts acting in their judicial capacity
 - 9(2)(a) - Explicit consent of the data subject

We collect your personal data from the following indirect sources

| Data subject type | Personal data type | Indirect source name |
|--------------------------|-------------------------------------|-----------------------------|
| Prospective team members | Contact details | Recruitment agency |
| Prospective team members | Date of birth/age | Recruitment agency |
| Prospective team members | Employment references | Previous employer |
| Prospective team members | Employment references | Recruitment agency |
| Prospective team members | Hours worked and rate of pay/salary | 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 |
| Prospective team members | Identification Number | Recruitment agency |
| Prospective team members | Name | Recruitment agency |
| Social media visitors | Online Identifiers | Social media sites |
| Website visitors | Online Identifiers | Website |
| Prospective team members | Telephone contact details | Recruitment agency |
| Clients | Visual Images | CCTV system |
| Visitors | Visual Images | CCTV system |
| 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 |
|--------------------------|-------------------------------|-------------|----------------|
| Prospective team members | Advanced | Processor | Netherlands |
| 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 | Microsoft | Processor | Austria |
| Prospective team members | Occupational health provider | Controller | United Kingdom |
| Prospective team members | Reach ATS | Processor | United Kingdom |
| Prospective team members | Savran | Controller | United Kingdom |
| Clients | Bottomline | Processor | United Kingdom |

| | | | |
|--|---|------------|----------------|
| Clients | CCTV system | Processor | United Kingdom |
| Clients | EGym | Processor | United Kingdom |
| Clients | EPOS Now | Processor | United Kingdom |
| Clients | Health and Safety Executive (HSE) | Controller | United Kingdom |
| Clients | Insurance provider and broker | Controller | United Kingdom |
| Clients | Law enforcement body | Controller | United Kingdom |
| Clients | Legal advisors | Controller | United Kingdom |
| Clients | Microsoft | Processor | Austria |
| Clients | My Business Cloud Solution | Processor | United Kingdom |
| Clients | Payment Sense Limited | Controller | United Kingdom |
| Clients | Photographers | Processor | United Kingdom |
| Clients | Sage | Processor | United Kingdom |
| Clients | Web and design agency | Processor | United Kingdom |
| Data subjects | Information Commissioner's Office (ICO) | Controller | United Kingdom |
| Data subjects | Microsoft | Processor | Austria |
| Data subjects | PrivIQ | Processor | United Kingdom |
| Visitors | Health and Safety Executive (HSE) | Controller | United Kingdom |
| Visitors | Insurance provider and broker | Controller | United Kingdom |
| Visitors | Law enforcement body | Controller | United Kingdom |
| Visitors | Legal advisors | Controller | United Kingdom |
| Visitors | Microsoft | Processor | Austria |
| Website visitors | Analytical partners | Processor | United Kingdom |
| Social media visitors | Analytical partners | Processor | United Kingdom |
| Social media visitors | Microsoft | Processor | Austria |
| Enquirers | Microsoft | Processor | Austria |
| Enquirers | Sherpa | Processor | Ireland |
| External business development contacts | Microsoft | Processor | Austria |
| External business development contacts | Sherpa | Processor | Ireland |
| Suppliers | Legal advisors | 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

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