

Privacy Policy

Introduction

We, at Knellwood, take your privacy seriously and will only use your personal data to provide the services you have requested from us, and to send you information about elderly care services you may be interested in. We will never sell, share or use your personal information other than as described here.

This policy sets out how Knellwood will use and share the personal data and other information that you give us as a client, service user or related third party.

The General Data Protection Regulation (GDPR) describes how organisations must collect, handle, process and store personal information. These rules apply regardless of whether it is stored electronically, on paper or on other media. GDPR is underpinned by eight main principles. These state that personal data must be:

- Processed fairly and lawfully
- Obtained only for specific, lawful purposes
- Adequate, relevant and not excessive
- Accurate and kept up to date
- Held for no longer than is necessary
- Processed in accordance with the rights of the data subjects (i.e. service users)
- Protected appropriately
- Not transferred outside the European Economic Area (EEA), unless that country / territory also ensures an adequate level of protection.

Data we collect about you

Your personal data is required for us to provide our services to you. By submitting it, you agree to the use of such information in accordance with this Privacy Policy. You will be able to change your preferences at any time.

Data we collect about you may include:

Data Type	Examples
Contact	Personal address, business address, service address, National Insurance number, email address and telephone number.
Financial	Bank account and payment card details, information about payments to and from you, and details of elderly care services you have purchased from us.
Identity	First name, maiden name, last name, username or similar identifier, marital status, date of birth and gender.
Technical	Internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology relating to the devices you use to access our website.
Medical	Details about any medical conditions, your medication, treatment, Care Plans, DNAR (Do Not Attempt Resuscitation instructions), End of Life Plans, and other sensitive personal information.
Other	Factors specific to physical, physiological, genetic, medical, mental, economic and cultural identifiers.

Table 1

How we collect your data

We collect your data when you contact us via our website, by phone, or when you or your representative completes forms or other documentation as required by us. This may include sensitive personal information and also data collected indirectly from an advocate, other healthcare professionals, or authorised agencies that have been involved in your care or treatment.

When you contact us as a potential client we will collect some basic information about you including contact, identity and medical details - see Table 2 (below). When you become a service user we will collect additional information as shown in Table 1 (above).

If you do not become a service user, this data will be deleted from Knellwood's records.

We need to collect this personal data about you in order to deliver the appropriate care that you need, and to ensure that your ongoing healthcare requirements are met. We require explicit consent from you or your representative to process personal data.

How your data is used

We will only process your data where we have a lawful reason e.g:

- Administering finance (e.g. fees, contracts and payments)
- Providing support services
- Providing care and medical services
- Acting in the best interests of our service users
- Providing IT and information services
- Managing Knellwood accounts
- Monitoring equal opportunities
- Carrying out research and statistical analysis
- Providing operational information
- Safeguarding
- Ensuring adequate security
- Preventing and detecting crime

This is particularly important where we process data for people without capacity or with reduced or variable capacity. Under the GDPR we must obtain consent from a person holding Lasting Power of Attorney or next of kin. We will make reasonable efforts to verify that the person providing that consent is responsible for that individual. As a Care Home we rely on Article 9 of the GDPR* in order to process special categories of data.

We may process your personal data without your knowledge or consent where this is required or permitted by law, or where we consider this to be in your best interest.

In some circumstances we may anonymise your personal data so that it can no longer be associated with you, and we may use such information without further notice to you.

The GDPR permits us to share some information with third parties who use it for non-marketing purposes (including credit risk assessment/management, identification, fraud prevention and debt collection).

**See the GDPR link at the end of this document*

Table 2 shows how and why the types of data are used and why they need to be processed.

.Purpose/Activity	Data Type (see Table 1)	Lawful Basis for Processing
To discuss our services and register you as a new service user or client	Contact Identity Medical	With consent from you or your representative: (a) To fulfil a contract with you (b) For our legitimate interests
To provide care and medical services, including medication management	Contact Identity Medical	With consent from you or your representative: (a) To fulfil a contract with you (b) For our legitimate interests (c) Protecting your interests
To process and deliver your services including: (a) Managing payments, fees and charges (b) Collecting and recovering money owed to us (c) Managing your care and well-being	Contact Identity Financial Medical	With consent from you and appropriate third parties: (a) To fulfil a contract with you (b) For our legitimate interests - to recover debts owed to us (c) Protecting your interests
To manage our relationship with you, including: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	Contact Identity	(a) To fulfil a contract with you (b) To comply with a legal obligation (c) For our legitimate interests - to keep our records updated and to study how clients use our services.
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity Technical	(a) For our legitimate interests - to run our business, provide administration and IT services, for network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise (b) To comply with a legal obligation.

Table 2

Parties with whom we may share your data

We may have to share your personal data with the parties listed below for the purposes in Table 2:

- Providers of IT and system administration services
- Professional advisers who provide consultancy, banking, legal, insurance and accounting services
- HM Revenue & Customs, regulators and other authorities based in the UK
- Medical Professionals including doctors, nurses, physiotherapists, chiropractors, dentists, opticians, occupational therapists, social workers, the CQC and Continuing Care groups
- Third parties to whom we sell, transfer, or merge parts of our business or assets.

Your Rights

If you wish to know what data we hold about you, you can contact us to obtain the details. You are entitled at any time to request an update of your data, or information regarding its use, transfer, storage or processing.

You will not normally have to pay a fee to access your personal data (or to exercise any of the other rights); however, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

You can ask us to delete the data we hold about you but this may prevent us from providing you with the services we offer.

Disputes

If you are not satisfied with the way we handle your data, please contact us via the Bursar in the first instance. If you feel we have been unable to address your concerns, you may contact the Information Commissioner.

The bursar can be contacted:

- via our website at <http://knellwood.co.uk/>
- by post at 83 Canterbury Road, Farnborough, GU14 6QN
- by email at bursar@knellwood.co.uk

Contact Details for the Information Commissioner's Office

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Information about GDPR can be found at:

<https://ico.org.uk/for-organisations/data-protection-reform/overview-of-the-gdpr/>