



# PRIVACY NOTICE

## Stonehaven Care Group

**Stonehaven (Healthcare) Ltd** understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all our **customers** and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

## 1. Information About Us

### Stonehaven (Healthcare) Ltd

Limited company registered in England under company number 03650153

Registered address: Unit C4, Linhay Business Park, Eastern Road, Ashburton, Devon, TQ13 7UP

Data Protection Officer: Paul Ratcliffe  
[paul@compu-tech.co.uk](mailto:paul@compu-tech.co.uk)  
07917 061589  
0333 344 0076 Ext 1

Data Controller: Stephen Stone  
[stephenstone@stone-haven.co.uk](mailto:stephenstone@stone-haven.co.uk)  
07768741341  
01364 644 208 Ext 5

We are regulated by the Care Quality Commission (CQC)

## 2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

## 3. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

#### 4. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 12.
- b) The right to access the personal data we hold about you. Part 11 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 12 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 12 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 12.

In some instances, if you refuse to provide us with certain information when requested, we may not be able to perform the contract we have entered into with you. Alternatively, we may be unable to comply with our legal or regulatory obligations.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

#### 5. What Personal Data Do You Collect?

We may collect some or all of the following personal data (this may vary according to your relationship with us):

- basic personal information, including name and address, date of birth and contact details;
- financial information, including account and transactional information and history;

- information about you and your family (such as dependents, marital status, next of kin and contact details);
- Information about your preferences and interests;
- visual images (such as copies of passports);
- details of any services you have received from us;
- information we receive from other sources, such as government departments and healthcare providers;
- our correspondence and communications with you;

Service Users - as a care provider, we must collect some personal information on our service users, including personal health information, which is essential to our being able to provide effective care and support. The information is contained in individual files (manual and electronic) and other record systems, all of which are subject to strict security and authorised access policies.

Employees and volunteers - the service operates a recruitment policy to comply with the regulations in which all personal information obtained, including CVs and references, is, as with service users information, securely kept, retained and disposed of in line with the GDPR. All employees are aware of their right to access any information about them.

Third parties - all personal information obtained about others associated with the delivery of the primary care service, including contractors and suppliers will be protected in the same way as information on service users and employees.

Sometimes your personal data is obtained from the following third parties (depending on your relationship with us):

- HMRC, DWP and other government departments;
- NHS, CQC and healthcare providers;
- local authorities;
- emergency services;
- suppliers;

We may also process certain sensitive categories of information for specific and limited purposes, such as making our services accessible to service users. We will only process special categories of information where we've obtained your explicit consent or are otherwise lawfully permitted to do. This may include:

- information about racial or ethnic origin, religious, political or philosophical beliefs;
- physical or psychological health details or medical conditions;

## 6 How we collect information

The bulk of service user, employees and third parties personal information is collected directly from them or through form filling, mainly manually, but also electronically for some purposes, eg when contacting the service through its website.

With service users, we might continue to build on the information provided through consultations and in the process of agreeing care.

With employees, personal information is obtained directly and with consent through such means as references, testimonials and criminal records (DBS) checks. When recruiting staff, we seek applicants' explicit consent to obtain all the information needed for us to decide to employ them.

All personal information obtained to meet our regulatory requirements will always be treated in line with our explicit consent, data protection and confidentiality policies.

## 7 How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for any of the following purposes:

- providing and managing your account;
- supplying our services to you. Your personal details are required in order for us to enter into a contract with you;
- personalising and tailoring our services for you;
- communicating with you. This may include responding to emails or calls from you;
- supplying you with information by email AND/OR post that you have opted-in to (you may unsubscribe or opt-out at any time by contacting us);

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email/telephone/text message and post with information, news, and offers on our products and services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

## 8 How Long Will You Keep My Personal Data?

Personal information that becomes inactive for any reason is kept securely only for as long as it is needed, before being safely disposed of.

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- basic information – 10 years. We may anonymise or pseudonymise the personal data so that it can no longer be associated with you, in which case we may use it without further notice to you;
- financial information – 6 years;
- medical information – 3 years from discharge;

- sensitive information – 3 years from discharge;

## 9 How and Where Do You Store or Transfer My Personal Data?

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- necessary technical measures to ensure personal data is protected;
- all data transferred is encrypted during transit and at its destination;
- data is not processed for any purpose other than as agreed upon in our terms and conditions;
- protect your data from loss;

Our website and databases are regularly checked by experts to ensure they meet all privacy standards, are protected through strong passwords and encryption and comply with our general data protection security and protection policies.

If we transfer your data to a third party based in the US, we ensure this is protected by the EU-US Privacy Shield. This requires that third party to provide data protection to standards similar levels of data protection to those in Europe. More information is available from the European Commission.

Please contact us using the details below in Part 12 for further information about the particular data protection mechanism used by us when transferring your personal data to a third country.

## 10 Do You Share My Personal Data?

We only share the personal information of service users, employees and others with their consent on a “need to know” basis, observing strict protocols in doing so. Most information sharing of service users information is with other professionals and agencies involved with their care and treatment. Likewise, we would not disclose information about our employees without their clear agreement, eg when providing a reference.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

Where we provide information for statistical purposes, the information is aggregated and provided anonymously so that there is no privacy risk involved in its use.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 9.

If any personal data is transferred outside of the EEA, We will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR, as explained above in Part 9.

## 11 How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 12. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 14 days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

## 12 How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Stephen Stone):

Email address: [stephenstone@stone-haven.co.uk](mailto:stephenstone@stone-haven.co.uk)

Telephone number: 01364 644208.

Postal Address: Unit C4, Linhay Business Park, Eastern Road, Ashburton, Devon, TQ13 7UP

## 13 Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if We change our business in a way that affects personal data protection.

Any changes will be made available on the privacy policy page on our website. [stone-haven.co.uk/privacy-policy](http://stone-haven.co.uk/privacy-policy)