

Fair Processing Notice of Kinning Park Care Home (Scotland) Limited

Our Fair Processing Notice describes the categories of personal data we process and for what purposes. We are committed to collecting and using such data fairly and in accordance with the requirements of the General Data Protection Regulations (GDPR) and any related UK legislation.

1 Introduction

- 1.1 You can find out more here about your privacy rights and how we gather, use and share your personal information. That includes the personal information we already hold about you now and the further personal information we might collect about you, either from you or from a third party. How we use your personal information will depend on the services we provide to you.
- 1.2 If you have any queries regarding our use of your personal information, please contact us at] info@kinningparkcarehome.co.uk or by post at Data Protection Officer, Kinning Park Care Home, 30-34 Mair Street, Glasgow G51 1HA.
- 1.3 This Privacy Notice provides up to date information about how we use your personal information and will update any previous information we have given you about using your personal information (also referred to as personal data).
- 1.4 We are the controller of your personal information under the data protection legislation, unless otherwise stated in this privacy notice.

2 Your Privacy Rights

- 2.1 You can exercise any of your rights by writing to us at: Data Protection Officer, Kinning Park Care Home, 30-34 Mair Street, Glasgow G51 1HA or by email to info@kinningparkcarehome.co.uk
- 2.2 Any requests received by us will be considered under applicable data protection legislation. If you remain dissatisfied, you have a right to raise a complaint with the Information Commissioner's Office at www.ico.org.uk.

Right to be informed	We will use this Fair Processing Notice to inform you about the collection and use of your personal data.
Right to access	You have a right to request access to the personal information that we hold about you by making a "subject access request".
Right of rectification	If you believe that any of your personal information is inaccurate or incomplete, you have a right to request that we correct or complete your personal information.
Right of erasure	If you wish us to delete your personal information, you may request that we do so.
Right to restrict processing	You have a right to request that we restrict the processing of your personal information for specific purposes.
Right to object	You have a right to object to us processing your personal data in certain circumstances.

3 What kinds of personal information we use.

- 3.1 We use a variety of personal information depending on the services we deliver.
- 3.2 In all cases, we need to use your name, address, contact details and information to allow us to correspond with you and provide our services. The types of personal data we may use include:

Contact information	In all cases, we need to use your name and contact details including postal address, e-mail address and phone number.
Information relating to financial status or position	We may hold information on your financial status in connection with funding of residency and care costs for residents, which may include their family members if relevant for payment.

Information relating to payments	Funds received from or in relation to your account (e.g. to pay for services). We do not store credit or debit card details, but will use them to process payments in line with PCI-DSS regulation.
Health records	We require to hold health records of residents to ensure we can provide our services to them and to make them available to those providing medical care.
Personal information contained in communications with individuals across different channels.	Copies of letters received by or sent to us, information relating to emails received by or sent from us and other information or logs about when communication has taken place (rather than the content of that communication).
Open data and public records	Personal information relating to individuals that is, or can be, collected from public or open sources. These do not necessarily have to be collected from open data/public records, and may come from other sources (e.g. from you directly).
Consents	Personal data relating to permissions, consents or preferences given to us by individuals, including marketing permissions, contact permission and marketing preferences.
Technical	When you visit our website and use other systems, we may collect information to monitor usage. This could include IP address, operating system and browser type. This will be used to improve our website, systems and for research into service delivery.

4 **How we gather your personal information**

4.1 We obtain personal information from a wide range of sources:

- 4.1.1 Directly from you, for example when you complete a resident's or relative's details form, submit an enquiry through our website, sign up to an event or to receive marketing communications, contact us in writing, by email, in person, by telephone, or by any method.
- 4.1.2 From a resident or family member who provides your personal information to us;
- 4.1.3 From information you have made publicly available.
- 4.1.4 From other entities who have referred you or the resident to whom you are connected.

5 **How we use your personal information**

5.1 ***To respond and communicate***

We use personal information to allow us to respond to you and communicate with you regarding your questions, comments, support needs, complaints or concerns.

5.2 ***Using resident information***

When you or someone connected to you becomes a resident, we will collect, store and use the personal information that you provide to us in your and the resident's instructions and during the course of such relationship.

5.3 **Treatment**

Medical records and other personal information will be used in connection with medical treatment and other services provided to residents.

5.4 **To market services**

We will use contact details provided by you and/or our residents and information on the services residents have used to assess what other services would be most beneficial to them.

5.5 **For Financial management and debt recovery**

We may give information to and receive information from third parties where that is necessary to recover debts due to us.

6 **Our legal basis for using your personal information**

6.1 We only use your personal information where that is permitted by the laws that protect your privacy rights. We only use personal information where:

- 6.1.1 we have your consent (if consent is needed);
- 6.1.2 we need to use the information to comply with our legal obligations;
- 6.1.3 we need to use the information to perform a contract with you; and/or
- 6.1.4 it is fair to use the personal information either in our interests or someone else's interests, where there is no disadvantage to you – this can include where it is in our interests to promote our services by sending communications.

6.2 Where we have your consent, you have the right to withdraw it, but this may impact on services provided to you or the resident(s) to whom you are connected.

7 **Sharing your personal information**

7.1 We may be required to share personal information with statutory or regulatory authorities and organisations to comply with statutory obligations.

7.2 We may require to share personal data, including health records with those providing medical or other treatment to you.

7.3 We may require to share personal data including financial information with a local authority or other entity providing funding to you or the resident(s) with whom you are connected.

7.4 We may also share personal data with our professional advisors for the purposes of taking advice.

7.5 We employ third party suppliers to provide services. These suppliers may process personal data on our behalf as "processors" and are subject to written contractual conditions to only process that personal data under our instructions and protect it.

7.6 In the event that we do share personal data with external third parties, we will only share such personal data strictly required for the specific purposes and take reasonable steps to ensure that recipients shall only process the disclosed personal data in accordance with those purposes.

8 **Storing personal information**

8.1 We will protect your personal information in order to prevent unauthorised access to, or use or disclosure of, your personal information through a number of physical and technical security measures. Your personal information is stored on our systems that we have both physically and electronically controlled access to.

8.2 Your personal information is processed by our staff and some sub-contractors or suppliers who provide us with services. This processing is carried out under contracts which impose strict requirements on our suppliers to keep your personal information confidential and secure to process personal data on our behalf as "processors" and only process that personal data in accordance with our instructions.

- 8.3 Your personal information may be processed by those providing other services, including medical treatment. In doing so much service providers may deal with such personal data in such a way e.g. to determine medical treatment, that may make them a data controller.
- 8.4 For the purposes of IT hosting and maintenance, the personal information we hold is located on servers within the European Union.

9 How long we keep your personal information for

We will retain your personal information for as long as is required to comply with our obligations set out above, unless you ask us to return any documents to you.

Reviewed May 2018