

CAREIUM – WEBSITE AND SERVICE USER PRIVACY NOTICE

Introduction

Careium UK Limited respects your privacy and is committed to protecting your Personal Data. This Privacy Notice will tell you about to how we look after your Personal Data when you visit our website (regardless of where you visit it from) or use our products and services and tell you about your privacy rights and how the law protects you.

Please also see the Glossary below, which provides further detail on the meaning of some of the terms used in this Privacy Notice.

1. Important information and who we are

Purpose of this Privacy Notice

This Privacy Notice aims to give you information on how Careium UK Limited collects and processes its users Personal Data through your use of this website and our products and services, including any data you may provide through this website when you:

- use this website;
- provide your contact details as a potential client (or an employee of a potential client);
- place an order to use and when you use our products or services from us (either directly or as an employee of a client);
- use our products and services via a third party (who will provide you with their own privacy notice);
- contact us to make a complaint; or
- contact us directly for another purpose.

This website is not intended for children, and we do not knowingly collect data relating to children.

It is important that you read this Privacy Notice together with any other privacy, data protection or fair processing information we may provide on specific occasions when we are collecting or processing Personal Data about you (including when we provide you with our products and services) so that you are fully aware of how and why we are using it. This Privacy Notice supplements other notices and privacy policies and is not intended to override them.

Controller

Careium UK Limited is the controller and responsible for your Personal Data (collectively referred to as "Careium", "we", "us" or "our" in this Privacy Notice) where you have a direct relationship with us. Where you have accessed our products or services via a third party (such as a care home provider or local authority) you should confirm with their privacy policy if they have provided your personal data to us as a processor for them or to us as a controller. Where we act as a controller this notice will apply but if we act as a processor then the third parties privacy notice will apply. If you have any questions about this Privacy Notice, including any requests to exercise your legal rights (as referred to below), please contact us using the details set out below.

Contact details

If you have any questions about this Privacy Notice or our privacy practices, please contact us:

Full name of legal entity: Careium UK Limited

Email address: gdpr@careium.com

Postal address: Aspinall House, Walker Office Park, Blackburn, Lancashire BB1 2QE

Telephone number: 0300 333 6511

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk) if you are concerned in relation to how we collect or process your Personal Data. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the Privacy Notice and your duty to inform us of changes

We keep our Privacy Notice under regular review.

It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins, applications and social media platforms. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites, plug-ins, applications or social media platforms and are not responsible for their privacy statements. When you leave our website, we encourage you to read the Privacy Notice of every website you visit.

Our products and services may be provided in conjunction with or via third parties such as a care home or local authority provider. The third party will confirm how they pass data to us. Where you have accessed services via a third party we will provide information to them that they require to deliver their services to you.

2. The data we collect about you

Personal Data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of Personal Data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier and title. This may include details of your employment if acting as an employee.
- **Contact Data** includes billing address email address and telephone numbers.
- **Financial Data** includes payment methods, bank details and direct debit mandates.
- **Transaction Data** includes details about payments from you and other details of products and services you have purchased from us, including recordings of telephone calls.
- **Technical Data** includes 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 on the devices you use to access this website and our services.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your Personal Data but is not considered Personal Data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users

accessing a specific website feature. However, if we combine or connect Aggregated Data with your Personal Data so that it can directly or indirectly identify you, we treat the combined data as Personal Data which will be used in accordance with this Privacy Notice.

We do collect **Special Categories of Personal Data** about you (this type of data includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). We may collect personal data about your health. We do this so we can provide our services to you. We do this with your consent.

We do not collect any information about criminal convictions and offences.

If you fail to provide Personal Data

Where we need to collect Personal Data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our products or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. How is your Personal Data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes Personal Data you provide when you:
 - enquire about, or place an order for, our products or services;
 - create an account on our website;
 - subscribe to our services or publications;
 - request marketing to be sent to you; or
 - give us feedback or contact us.
- **From family members.** We may need to collect details of a clients next of kin to provide information on their family member or for the purposes of our services. This would be Identity and Contract Data.
- **From other employees.** If your employer is dealing with us they may provide your details to us in order that we can deliver our services and products, or for you to engage with us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this Personal Data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy below for further details.

4. How we use your Personal Data

We will only use your Personal Data when the law allows us to. Most commonly, we will use your Personal Data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.
- Where we have your consent to process medical details.

Please see the Glossary and Lawful Basis sections of this Privacy Notice below to find out more about the types of lawful basis that we will rely on to process your Personal Data.

Purposes for which we will use your Personal Data

We have set out below, in a table format, a description of all the ways we plan to use your Personal Data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Please note that we may process your Personal Data for more than one lawful ground depending on the specific purpose for which we are using your Personal Data. Please contact us if you need details about the specific legal ground we are relying on to process your Personal Data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To deal with enquiries from you about our products or services	(a) Identity (b) Contact	(a) Necessary for our legitimate interests (to support you or the contract with your employer)
To register you as a new customer	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to support the contract with your employer)
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us/ perform a contract with your employer)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or Privacy Notice (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services/ perform a contract with your employer)
To manage the services we provide to a customer including, making contact with family members and third party service providers (such as care home and local authorities).	(a) Identity (b) Contact	(a) Necessary for our legitimate interests (to support the contract with your employer)
For training purposes, to prevent and detect crime (including fraud) and to administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)

	(f) Technical	
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
For assessment and analysis and to make suggestions and recommendations to you about products or services that may be of interest to you, and to invite you to attend our events	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

Marketing

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased products or services from us and you have not opted out of receiving that marketing.

Third party marketing - Opting out

You can ask us to stop sending you marketing messages at any time by contacting us using the details provided above.

Where you opt out of receiving these marketing messages, this will not apply to Personal Data provided to us as a result of a product or service purchase or order, product or service experience or other transactions.

Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
- **Analytical or performance cookies.** These allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie Name	1 st Party or 3 rd Party Cookie	Cookie Type	Purpose	Duration
ga*	3 rd party	Analytical	Google Analytics sets this cookie to store and count page views.	1 year 1 month 4 days
_ga	3 rd party	Analytical	Google Analytics sets this cookie to calculate visitor, session and campaign data and track site usage for the site's analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognise unique visitors.	1 year 1 month 4 days
_gid	3 rd party	Analytical	Google Analytics sets this cookie to store information on how visitors use a website while also creating an analytics report of the website's performance. Some of the collected data includes the number of visitors, their source, and the pages they visit anonymously.	1 day
_gat_UA-*	3 rd party	Analytical	Google Analytics sets this cookie for user behaviour tracking.	Less than a minute
_fbp	3 rd party	Analytical	Facebook sets this cookie to display advertisements when either on Facebook or on a digital platform powered by Facebook advertising after visiting the website	3 months
cookieawinfocheckbox-necessary	3 rd party	Necessary	Set by the GDPR Cookie Consent plugin, this cookie records the user consent for the cookies in the "Necessary" category.	1 year
cookieawinfocheckbox-functional	3 rd party	Necessary	The GDPR Cookie Consent plugin sets the cookie to record the user consent for the cookies in the category "Functional".	1 year
cookieawinfocheckbox-performance	3 rd party	Necessary	Set by the GDPR Cookie Consent plugin, this cookie stores the user consent for cookies in the category "Performance".	1 year
cookieawinfocheckbox-analytics	3 rd party	Necessary	Set by the GDPR Cookie Consent plugin, this cookie records the user consent for the cookies in the "Analytics" category.	1 year
cookieawinfocheckbox-advertisement	3 rd party	Necessary	Set by the GDPR Cookie Consent plugin, this cookie records the user consent for the cookies in the "Advertisement" category.	1 year
cookieawinfocheckbox-others	3 rd party	Necessary	Set by the GDPR Cookie Consent plugin, this cookie stores user consent for cookies in the category "Others".	1 year

We do not share the information collected by the cookies with any third parties.

If you do not want to accept cookies, you can change your browser settings so that cookies are not accepted. If you do this, please be aware that you may lose some of the functionality of this website. For further information about cookies and how to disable them please go to the Information Commissioner's webpage on cookies: <https://ico.org.uk/for-the-public/online/cookies/>.

Change of purpose

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your Personal Data

We may share your Personal Data with the parties set out below for the purposes set out in the table above:

- Third Parties as set out in the Glossary.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your Personal Data in the same way as set out in this Privacy Notice.

We require all third parties to respect the security of your Personal Data and to treat it in accordance with the law. We do not allow our third-party service providers to use your Personal Data for their own purposes and only permit them to process your Personal Data for specified purposes and in accordance with our instructions.

We may share your Personal Data with third parties who have agreements with you for whom we act as a Data Processor. Where we act on this basis it is the third party who is the Data Controller and will confirm the basis of any Personal Data use.

6. International transfers

We do not transfer your Personal Data outside the UK or European Economic Area (**EEA**).

7. Data security

We have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your Personal Data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your Personal Data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected Personal Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

How long will you use my Personal Data for?

We will only retain your Personal Data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your Personal Data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for Personal Data, we consider the amount, nature and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your Personal Data: see the Your Legal Rights section below for further information.

In some circumstances we will anonymise your Personal Data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your Personal Data.

You have the right to:

Request access to your Personal Data (commonly known as a "data subject access request"). This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.

Request correction of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your Personal Data. This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your Personal Data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your Personal Data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your Personal Data. This enables you to ask us to suspend the processing of your Personal Data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your Personal Data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your Personal Data to you or to a third party. We will provide to you, or a third party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your Personal Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us using the details set out above.

No fee usually required

You will not 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 could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could 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.

10. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your Personal Data for our legitimate interests. We do not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your Personal Data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your Personal Data where it is necessary for compliance with a legal obligation that we are subject to.

THIRD PARTIES

Third Parties

- Service providers acting as processors based in the UK and EEA who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in UK and EEA who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Service providers acting for you in the provision of related services, such as emergency services, your care home or a local authority obtaining services to assist you.
- Third party equipment providers whose equipment you have access to via your arrangement with us.

Last Updated: 30 November 2023.