



Privacy Notice

Solace Care Group Ltd

There are regulations to protect your Personal Data (which include the Data Protection Act 2018; the Privacy and Electronic Communications (EC Directive) Regulations 2003 and the General Data Protection Regulations; (collectively referred to as the 'Regulations').

This Notice sets out the commitments by Solace Care Group Ltd (referred to as the 'Company') to protect your Personal Data and safeguarding your privacy and informs you

- a) what Personal Data is collected;
- b) the purpose for which the personal data will be processed;
- c) how the personal data will be stored;
- d) who the Personal Data is shared with;
- e) your rights in respect of that Data;
- f) other relevant information in relation to the Personal Data.

The Company is the Data Controller for your Personal Data and is responsible for the collection, processing, storing, retention and safeguarding your Personal Data.

The Company pride ourselves on keeping up to date with advances in technology and legal developments which can result in the need to change this Privacy Notice, if any changes are made to this Privacy Notice or the way how the Company collects or uses your Personal Data then the Company shall make the new notice available.

You will be asked to expressly agree to this Privacy Notice upon your first contact with the Company or when visiting the Company website <http://www.solacecaregroup.co.uk> (referred to as the 'Website'), if you do not agree with anything within this Privacy Notice, you must not continue with your communications or viewing the Website.

1. Your Personal Data

- 1.1. 'Personal Data' means any information in any format or medium, from which you can be personally identified.
- 1.2. The Regulations and regulatory bodies provide rules and guidance about how the Company can process your Personal Data and steps that must be taken to protect your Personal Data and privacy.
- 1.3. The Company will not gather, collect, process or store any Personal Data from your use of the Web site except where there is a lawful purpose for doing so and;
 - a) that is necessary for processing an enquiry;
 - b) to take the necessary steps to enter into a contract with you;
 - c) to monitor the use of the Website and to identify misuse or fraud;
 - d) to collect anonymised information about the use of the website to ensure it is compatible with current devices and software, ensure is functioning correctly and monitor referral sources (how you found the Website)
 - e) for internal records that the Company are legally obliged to keep;
 - f) to help deal with complaints, disputes and legal actions;
 - g) where necessary to protect the vital interest of you or another person;

2. Visits to the Website

2.1. When visiting the Website the Company may, as a legitimate interest collect the following information

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- a) The country from where you access the Website
- b) The browser, operating system and screen resolution used by the device you are accessing the Website from;
- c) The web pages that you visit;
- d) The referral source (the link or the search query entered into a search engine that you used to arrive at the Website)

2.2. This information is collected by third party processors who generate anonymous reports and statistics, you cannot be identified by this information but it helps the Company to

- a) monitor usage and performance of the Website;
- b) maintain a Website that is user friendly and compatible with popular equipment and software;
- c) Analyse and maintain the security of the Website and trace inappropriate or malicious use.
- d) Improve the quality, delivery and functionality of the Website and services to you.

3. Enquiries

3.1. If you make an enquiry or request information through the Website, you are required to provide the Company with your name, a telephone number and an email address.

3.2. This Personal Data is processed as a legitimate interest

- a) for responding to your enquiry or to provide the requested information;
- b) to maintain internal records;
- c) to deal with complaints, disputes and legal actions;
- d) where necessary to protect the vital interest of you or another person;

3.3. The Company may use your Personal Data to contact you by

- a) Email;
- b) Text Message;
- c) Direct Mail;
- d) Telephone;

3.4. If any additional personal information is provided by you under the lawful purpose of consent then you may withdraw your consent at any time by following the instructions provided in each communication.

4. Sharing your Personal Data

4.1. The Company may use and share your Personal Data with its employees, officers, agents, consultants, suppliers, subcontractors, sub-processors or sponsors insofar as is reasonably necessary to perform one or more of the actions or purposes stated in paragraph 2.2 and

- a) In connection with any legal proceedings or prospective legal proceedings;
- b) for the identification and prevention of fraud or other criminal activity;
- c) with the purchaser (or prospective purchaser) of any business, asset or account which the Company are (or are contemplating) selling.
- d) Where you otherwise expressly permit or instruct the Company to do so.

4.2. The Company will also need to share your Personal Data with service providers used in sending you communications, for example telephone and internet providers or couriers in order that the communication may be delivered to you.

4.3. If any service provider is based outside of the UK or the EU then the Company shall ensure that the service provider and the country from where they operate have adequate protections and safeguards in place that are at least equal to those given by UK or EU regulations.

5. Your rights

5.1. You have the right

- a) to know the identity and contact details of the Data Controller and Data Protection Officer (where applicable);
- b) to know the purpose and legal basis for processing your Personal Data, and where processing is based on the legitimate interests of the Data Controller, what those legitimate interest are;
- c) to know whether your Personal Data is transferred or processed beyond the EU and that appropriate safeguards are in place;
- d) to access your Personal Data.
- e) to erase Personal Data.
- f) to restrict processing.
- g) to portable data.
- h) to withdraw consent
- i) to complain.

5.2. The right of access.

- a) You may require the Company to provide you with any Personal Data the Company hold about you. To obtain a copy of any Personal Data held contact the Data Controller.
- b) This Personal Data will be provided free of charge except where a request is manifestly unfounded or excessive (for example it is a repetitive request, or where the Company need to process large amounts of data) in which case the Company shall make a charge for any reasonable administrative costs in dealing with the request or refuse to respond but the Company must provide a justifiable reason for refusing to respond.
- c) The Company shall provide the requested information within one month of receipt of the request, however where there is a substantial amount of information or it is difficult to collate the Company may extend this timeframe by one month by providing you notice.
- d) As the Company take the issue of protecting your Personal Data seriously and follow strict storage and disclosure procedures and may occasionally require proof of identity from you prior to disclosing any information.

5.3. The right to erase Personal Data

- a) You have the right in certain circumstances to instruct the Company to erase your Personal Data where
 - i. The Personal Data is no longer necessary in relation to the purpose for which it was originally collected/processed.
 - ii. You withdraw your consent.
 - iii. You object to the processing and there is no overriding legitimate interest for continuing the processing.
 - iv. The Personal Data was unlawfully processed or obtained.
 - v. The Personal data has to be erased in order to comply with a legal obligation.
 - vi. The Personal Data is processed in relation to the offer of information services to a child.
- b) Where you have the right and you issue an instruction to erase your Personal Data the Company shall use all reasonable efforts to
 - i. Inform all third parties to whom your Personal Data has been shared or disclosed of the requirement to erase your Personal Data which they hold;
 - ii. In the event that your Personal Data has been published online the Company shall endeavour to ensure that any links or references are also removed;
- c) The Company may refuse to erase your Personal Data only

- i. to exercise the right of freedom of expression and information;
- ii. to comply with a legal obligation or for the performance of a public interest task or exercise of official authority;
- iii. for public health purposes in the public interest;
- iv. archiving purposes in the public interest, scientific research historical research or statistical purposes; or
- v. the exercise or defence of legal claims.

5.4. The right to restrict processing

- a) The Company shall, upon your request, restrict the processing of your Personal Data if the following circumstances arise
 - i. Where you contest the accuracy of the Personal Data, the Company shall restrict the processing until the accuracy of the Personal Data has been verified.
 - ii. Where you have objected to the processing where it was necessary for the performance of a public interest task or purpose of legitimate interests, and the Company are considering whether there are legitimate grounds override your grounds.
 - iii. When processing is unlawful and you oppose erasure and request restriction instead.
 - iv. If the Company no longer need the Personal Data but you require the information to establish, exercise or defend a legal claim.
- b) Where processing of your Personal Data is restricted, the information shall be stored but no further processing shall occur.
- c) The Company shall inform any third party to whom your Personal Data was disclosed that processing is restricted.
- d) The Company shall inform you when and restricted period comes to an end.

5.5. The right to portable data

- a) Any Personal Data which is stored electronically and the lawful purpose for processing is consent or for the performance of a contract; the Company shall hold that Personal Data in a portable format (readable in a format that will be commonly used on other computer systems) and the Company shall provide this data to you or directly to another organisation (where technically feasible) upon your request.

5.6. The right to complain.

- a) If you are not happy with the way the Company collect or store your Personal Data you can make a complaint to the Information Commissioners Office, however the Company would appreciate the opportunity to provide an explanation and put things right before you make a complaint.

5.7. The right to withdraw consent

- a) If you provide your consent to process your Personal Data in a particular way, you may withdraw your consent at any time by informing the Company.
- b) Upon receipt of a notice withdrawing your consent to process your Personal Data the Company shall stop processing the Data except:
 - i. Where it is necessary for the performance of a contract.
 - ii. Where there are compelling legitimate grounds for the processing, which override your interests, rights and freedoms; or
 - iii. the processing is for the establishment, exercise or defence of legal claims; or
 - iv. where the processing of the Personal Data is carried out under an obligation in law.

6. Automated Processing

- 6.1. The Company shall not use automated processing of your Personal Data to form or make decisions except where authorised or required by law or you have given your express consent for automated processing. If the Company use automated processing you are entitled to request details of the automated process.

7. Data Security

7.1. The Company will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of Personal Data, including storing of data on a secure, password protected and firewall protected servers.

8. Data retention

8.1. The Company shall only retain your personal data for as long as is necessary for the purpose which it was collected, which shall not exceed a period of 6 years, this being the period stated in law within which a legal claim can be commenced.