

# **Privacy policy**

This policy sets out how we collect, use and protect any information that you provide us including information provided while using this website and [including any data you may provide through our websites or otherwise when you sign up to our newsletter, correspond or apply for a job with us, require a role to be filled, purchase a product or service or take part in a competition ("Transaction")]. We are committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, you can be assured that it will only be used in accordance with this privacy statement. Our company may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. This policy is effective from 26th February 2012 and recently reviewed on May 20, 2018.

We strongly recommend that you read this privacy policy and other associated policies carefully as it contains important information about who we are as a company, how we operate, how and why we collect, store, use and share personal information. This policy also gives you information about your rights in relation to your personal information and on how to contact us and other organizations in the event of a complaint, comment or compliment.

### **Controller of Personal Information**

Verity Healthcare Limited considers itself as the 'controller' of personal information and have the responsible for how that data is managed. We recognize the tenets of the General Data Protection Regulation (GDPR), which applies in the United Kingdom and across the European Union, and our obligations to you and your rights in respect of how we manage your personal information.

Please see the section on Your rights and responsibilities for more information.

You may also be interested in our:

**Recruitment Privacy** 

#### **Employee Privacy**

As the 'controller' of your personal information, we recognize the GDPR regulation and its principles and will ensure that the personal information we hold about you is:

- Processed fairly, lawfully and in a transparent way.
- Obtained for specified and lawful purposes and not further processed in any manner that is not in line with those purposes.
- Adequate, relevant and not excessive.
- Accurate and kept up to date, where necessary
- Kept only for as long as it is necessary.
- Kept securely

### **Contact Information**

Verity Healthcare operate the website, www.verityhealthcare.co.uk and control how all information obtained from it is used and processed. We are a private limited company registered in England & Wales under registration number 07462140.

#### Our registered address is:

Verity Healthcare Limited 16 Beaufort Court Admirals Way, Docklands London, E14 9XL United Kingdom

The postal address is: 210 Church Road Gateway Business Centre Suite 1 - 4 London, E10 7JQ

**Tel:** 0203 771 5653 / 0203 6435295

Mob: 079 0855 4470

**Email:** DPI@verityhealthcare.co.uk

Our data protection registration number is: Z313775X.

If you have any questions about this privacy policy or our treatment of your personal or any other information, please write to us by email or by post. Please click here access our contacts page. If you do not want us to use your personal data and other information in the manner set out in this agreement, please exit our website.

### What information we may collect

We may collect information on our website and other information systems so we can identify you as an individual, to manage our relationship with you as a staff, patient or inquirer. Our customer database may record the following information about you:

- Name, address and contact details
- Age and date of birth
- Country of residence
- Details of queries you have made
- information from staff and service user surveys, competitions and marketing activities
- Services and quotes you have requested
- Service request applications made by you
- Requests for policies
- Feedback given on our services
- Medical history and reports

We may collect, store and use the following kinds of information relating to you and your use of our website, specifically information about your computer and about your visits to and use of this website (including your IP address, geographical location, browser type, referral source, length of visit and number of page views, what pages you view). We do not store credit or debit card details.

## Reasons we can collect and use your personal information

Verity Healthcare takes recognition of the demands of the GDPR expectation as a bsis for collecting and using personal information:

- Article 6(1)(a) processing is conducted with your consent to process personal data for specified purposes
- Article 6(1)(b) processing is necessary for the performance of our contracts to provide individuals with care and support services
- Article 6(1)(c) processing is necessary for us to demonstrate compliance with our regulatory framework and the law
- Article 6(1)(f) to process your personal data in pursuit of legitimate interests, which include;
  - 1. Marketing purposes the privacy impact on you is expected to be minimal. Marketing will be specific to services we believe are of interest to you using information from enquiries we receive from you, you can unsubscribe at any time
  - 2. Corporate due diligence and financial modelling, service development and innovation the privacy impact on you is expected to be minimal. We will process your data internally to ensure our business is stable, trusted and innovating to provide the best possible service to you

GDPR requires that additional care is taken when processing special category (sensitive) data such as your health. We process this under the following grounds within GDPR;

 Article 9(2)(h) – processing is necessary for the provision of social care or the management of social care systems and services.

## How we may collect Information

We collect information about you when you interact, correspond or enter into a Transaction with us whether by telephone, fax, by email, via CCTV cameras (in our offices) or by submitting the information through our websites or service applications. We will only ask for the information required for the Transaction and handle it in accordance with the Data Protection legislations (UK). We collect information when you directly provide it to us, for example by completing a form set out on our website. We also collect information by using cookies. We may collect the following information when visit you get in touch with us by whatever means to:

- Request for services by telephone, fax, online or using an intermediary source
- Apply for a policy.
- Submit any query to us, for example, by telephone, email, blog replies, or social media.
- Visit our website (please see our cookies policy for more details)
- Participate in any surveys, reviews and other research activities.
- Process an application we are liaising with your family, employer, or treatment or other benefit providers

#### **Use of Personal information**

On certain pages of our website we will ask you to provide us with certain information about yourself, which we will handle in accordance with the United Kingdom's Data Protection legislation. We maintain strict security standards and procedures with a view to preventing unauthorised access to your data. We use widely acceptable technologies such as firewalls, data encryption and server authentication to protect the security of your data. All subsidiary companies of Verity Group, all our staff and whenever we hire third parties to provide support services, are require to observe our privacy standards and to allow us to audit them for compliance.

We may use your personal information to:

- Administer and improve our website;
- Enable you to find information about our services

- Provide Google with statistical information about visitors to our website for the purpose of the Google Analytics services detailed above – but this information will not be used to identify you individually; and
- Deal with enquiries and complaints made by or about you relating to our website;
- Notify you of changes to this privacy policy and/or our terms and conditions, by email.
- Process your Transaction and for communicating with you in relation to this.
- Make your information available to our associated companies for the purposes of a Transaction.
- Make your information available to potential employers for the purposes of finding suitable employment for you when you apply for a job. Where we need to perform the contract, we are about to enter or have entered with you
- Comply with a legal or regulatory obligation.

We will not, without your express consent, use your personal information for direct marketing or provide your personal information to any third parties for the purpose of those third parties undertaking any direct marketing.

## **Your Rights and Responsibilities**

We will encourage you to recognise your responsibilities for presenting or divulging your data. You have a right at any time to stop us from contacting you for marketing purposes.

Under the GDPR you have important rights free of charge. In summary, those include rights to:

- Fair processing of information and transparency over how we use your use personal information
- Access to your personal information and to certain other supplementary information that this Privacy Promise is already designed to address
- Require us to correct any mistakes in your information which we hold
- Require the erasure (i.e. deletion) of personal information concerning you, in certain situations. Please note that if you ask us to delete any of your personal information which we believe is necessary for us to comply with our contractual or legal obligations, we may no longer be able to provide care and support services to you
- Receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- Object at any time to processing of personal information concerning you for direct marketing
- Object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you

- Object in certain other situations to our continued processing of your personal information
- Otherwise restrict our processing of your personal information in certain circumstances
- Claim compensation for damages caused by our breach of any data protection laws

If you no longer wish to be contacted for marketing purposes, please click on the unsubscribe link at the bottom of the marketing email you were sent or email **DPI@verityhealthcare.co.uk** with the subject 'unsubscribe'.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us because of other Transactions.

## How long do we keep the information for?

When you submit your information, this information will not be kept for more than the time the information is required and usually no more than 3 years. If you apply for a job and we cannot find a suitable role for you upon your initial application, we may retain your application data and will contact you in the future if a suitable vacancy arises. We maintain this information to ensure we offer you suitable roles and will keep such information for as long as necessary to fulfil the purposes we collected it for.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the likelihood of a suitable role arising where you are applying for a job, 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 requirements. Any information which is not required is shredded.

How to access, correct or withdraw your data

Verity Healthcare will make sure that your personal information is accurate and up to date. This

means that if your personal data changes during your relationship with us, we rely on you to keep us

informed. Should you need us to update any inaccurate data about yourself or ask us to stop

processing your data, please get in touch. Also, you have the right to withdraw your consent for us

to process your information for any reason, request a copy of the information we hold about you or

ask for your personal data to be deleted. If you require us to exercise any of these rights, please

email DPI@verityhealthcare.co.uk.

When we need process your data for a Transaction (other than for marketing purposes), and you

wish to withdraw your consent for us to process your information, then we may need to cease

communications with you. You will be needed to re-register and provide all of your personal

information all over again, should you choose to enter into a Transaction with us again in future.

Security of your personal information

You may request details of personal information which we hold about you under the Data Protection

Act 1998. We will ensure that the information we collect from our website is protected by

appropriate technical, security and organisational measures so as to ensure that such information is

not accidentally or unlawfully accessed, lost, altered, destroyed or disclosed.

Of course, data transmission over the internet is inherently insecure, and we cannot guarantee the

security of data sent over the internet. You are responsible for keeping any passwords or other user

details confidential. We will not ask you to reveal any password you have been issued with.

We have implemented 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 have

information access levels which limit employees, agents, contractors and other third parties who

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should have access to information. Your personal data will be processed on instructions that are in line with GDPR. All staff processing personal information 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.

For detailed information on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit <a href="https://www.getsafeonline.org">www.getsafeonline.org</a>.

#### International data transfers

Our website is hosted by an internet provider based in the United Kingdom. Information that you provide or which we otherwise obtain and collated in the United Kingdom in the course of you using our website. The information provided will be processed in United Kingdom only for the purposes they were meant for and in accordance with our instructions. By using our website, you agree to such transfer of your personal information.

We share your personal data within the Verity Group Limited. Information sharing will involve transferring your data outside the European Economic Area (EEA). Whenever your personal data are transferred out of the EEA, we ensure a high degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

## **Data sharing**

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so.

### Implied consent

We use cookies purely for analytical purposes (i.e. to count the number of unique visitors to the site) and do not collect any sensitive personal data. As such, and in accordance with the Information Commissioner's guidance on the Privacy and Electronic Communications Regulations, we understand by visiting this site, you have given your "implied consent" for cookies being set on your device.

#### Cookie

Cookies are text files placed on your computer to collect standard internet log information and how visitors browse on the computer. More technically, a cookie is a small amount of computer code that is sent by a web server – a computer hosting a website – to your internet browser, and stored by that browser. Your browser will then send information back to the web server each time the browser requests a page from the server. This enables the web server to identify and track the web browser, and in turn, your usage of the internet. We may use "session" cookies and "persistent" cookies on our website. Session cookies will be deleted from your computer when you close your browser. Persistent cookies will remain stored on your computer until deleted, or until they reach a specified expiry date.

Information about how you use our website is collected automatically using "cookies" and to compile statistical reports on website activity. None of our cookies store personal information. Some of the pages on our site also use cookies set by carefully selected third party suppliers. If you go on to a web page on our site that contains embedded content, for example a video from YouTube, you may be sent cookies from these websites.

We don't control the setting of these cookies, so we suggest you check the third-party websites for more information about their cookies and how to manage them. You can set your browser not to accept cookies and this website tells you how to remove cookies from your browser. For further information visit <a href="https://www.aboutcookies.org">www.aboutcookies.org</a>.

### **Our Cookie Policy**

To make your experience on our websites as specific to your needs as possible you will need to accept cookies. Our cookies do not store sensitive information such as your name or address they simply inform us of your past and current browsing behaviour i.e. what country you were last looking at, what browser you use and how many times you visit the site. If you'd prefer to restrict, block or delete cookies from our website, or any other website, you can use your browser to do this. Each browser is different, so check the 'Help' menu of your particular browser (or your mobile phone's handset manual) to learn how to change your cookie preferences.

### **Third Party Cookies**

When you visit our websites you may notice some cookies that aren't linked to our websites, these are cookies set by 3rd parties. One piece of 3rd party software that we use, called Google Analytics, uses cookies to measure how many visits we get to our website. In addition to this, if you go on to a web page on our site that contains embedded content, for example a video from YouTube, you may be sent cookies from these websites. We don't control the setting of these cookies, so we suggest you check the third-party websites for more information about their cookies and how to manage them.

## Turning off cookies when using your browser

If cookies aren't enabled on your computer its means that we won't be able to customise your web experience on our website. Regardless, if you wish to turn cookies off in your browser please consult

your browser documentation. If you'd like to learn more about cookies in general and how to manage them, visit www.aboutcookies.org.

Links

Our website may contain links to other websites provided by third parties not under our control. When following a link and providing information on that link please be aware that we are not responsible for the data provided by that third party. When you link to other websites you should read their privacy policies.

**Changes** 

Our company may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes.

**Modern Slavery Act 2015** 

To view the Verity Healthcare statement regarding compliance with the Modern Slavery Act 2015, please click here. When you instruct us to provide you with any personal information we hold about you; such information may be subject to the payment of a fee of £10.00.

You may instruct us not to process your personal information for marketing purposes by email at any time. This privacy policy is based on the versions of **Employment Law Contracts** and **Website**Law

**Policy amendments** 

This privacy promise was first published on 20 May 2018. We may update this privacy policy from time-to-time by posting a new version on our website. You should check this page occasionally to ensure you are happy with any changes.

## How to complain

We are committed to resolve any query or concern that may arise about our use of your information. The GDPR sets your right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at https://ico.org.uk/concerns/ or telephone: 0303 123 1113.

## For more information

If you require more information on how we can help you live comfortably at home and the way you want it, call our advisors on: **0203 771 5653 or email:** DPI@verityhealthcare.co.uk