

Privacy Notice for Business Customers & Suppliers

This privacy notice sets out important information about how we will collect and use personal information about you. This notice also describes what legal rights you have when we handle your information.

This privacy notice applies to our business customers and suppliers (but this does not include our services users, and includes patients, residents, and clients). We may change this privacy notice from time to time so it is best always to check on our website for the latest version.

Please take a moment to read this privacy notice. If you have any questions, please contact us, and details about how you may do that are included below.

Who are we?

We are Elysium Healthcare. Our hospitals, clinics, homes and schools are run by companies within our group. All these companies are registered at 2 Imperial Place, Maxwell Road, Borehamwood, WD6 1JN and their full names and registered company numbers are listed below:

Elysium Healthcare Limited (04063391)	Elysium Healthcare No.2 Limited (06244878)	Elysium Healthcare No.3 Limited (02989725)
Elysium Healthcare No.4 Limited (03257732)	Elysium Healthcare (Farndon) Limited (05255132)	Elysium Neurological Services (Badby) Limited (05558328)
Elysium Neurological Services (Adderley) Limited (09595914)	Stanley House Limited (05755615)	Elysium Healthcare (Lighthouse) Limited (05820919)
Elysium Healthcare (Acorn Care) Limited (03147293)	Elysium Healthcare (Phoenix) Limited (04227738)	Elysium Healthcare (Healthlinc) Limited (01440442)
Elysium Healthcare (Field House) Limited (05148271)	Elysium Care Partnerships No.2 Limited (05442152)	The Bridge Care Centre Limited (10310700)
Darlington Neurological Care Centre Limited (10532297)	Elysium Healthcare (Gregory House) Limited (08943865)	Elysium Care Partnerships Limited (06045903)
Pendarren Court Limited (09577953)	Elysium Healthcare (St Mary's) Limited (05131149)	Elysium Healthcare (All Saints) Limited (07807446)
Focus on Care Recruitment Limited (04012937)	The Chimneys Limited (10282525).	Elysium Healthcare (Ann House) Limited (08624668)

Each of these companies may, to the extent relevant, collect, retain and use information about you and we refer to these in this privacy notice as Elysium Healthcare.

What information do we hold about you?

We hold information about you in connection with your care and treatment or other services that we may provide to you. This may include:

- Identity data such as first name, last name, title.

- Contact data such as postal address, email address and telephone numbers.
- Transaction data such as the services you provide or use within Elysium.
- Marketing and Communications data includes your preferences in receiving marketing from us and your communication preferences.
- CCTV (audio & images) footage and other information obtained through electronic means, which may occur if, say, you visit any of our sites.

We do not collect any Special Categories of Personal Data about you

How is your personal information collected?

We typically obtain personal information about you through:

- Direct interactions. You may give us your identity and contact data by filling in forms or by corresponding with us by post, phone, email or otherwise.
- Third parties or publicly available sources. We may receive personal data about you from various third parties, such as database providers (subject to such companies complying with the GDPR), healthcare organisations or providers of services and public sources, such as Companies House or information on public websites.

How will we use information about you?

We will only use your personal information when the law allows us to. We will use your personal information:

- With your consent.
- Where it is in relation to a contract we have entered into with you.
- When there is a legal reason we need to use it.
- Where it is necessary for our justifiable interests (or those of a third party) and your interests and rights do not override those interests.

When we need to use any sensitive, personal information about you such as healthcare information, further rules apply. We can only use this information:

- In limited circumstances, but only if you tell us it is ok to do so.
- Where it is needed in relation to a legal matter.
- Where we need to protect your interests (or someone else's interests).
- Where it is needed in the public interest.

Why we collect and use your personal information

We will use your personal information:

- Where we need to notify you of matters which relate to the performance of any contract we may have with your organisation.
- Where we need to keep you updated on service development, service change and new provision.
- 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 or regulatory obligation.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising:

- **Relationship marketing**
 We may use your Identity and Contact 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 relationship marketing).
 You will receive marketing communications from us if you have requested information from us or your organisation purchases services from us or if you provided us with your details when you entered a competition and, in each case, you have not opted out of receiving that marketing.
- **Opting out**
 You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.
 Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of any other purpose.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us on the details given above.

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.

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 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 register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) 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)

To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) and to respond to regulators and government agencies	(a) Identity (b) Contact	(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) 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)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact	Necessary for our legitimate interests (to develop our products/services and grow our business)

What happens if you don't want to give us your personal information?

You don't have to tell us all of your personal details. You can tell us just the information you are happy for us to know, but this may mean that we might not be able to give you the full range of services that we have because we don't know enough about you.

Do we share information about you to others?

Yes, we do. We may share your information in relation to our dealings with you, and with the parties set out below for the purposes set out in the table above.

- Members of our group of companies.
- 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.

- Regulators and government agencies.

We may share information about you with third party suppliers, for example in relation to patient records held on computer systems. All our third-party service providers are required to take appropriate security precautions to protect your personal information.

None of our third-party service providers are allowed to use your personal data for their own purposes. We only allow them to use your personal information for certain reasons with instruction from us.

We may transfer your personal information outside the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

We may share your personal information with other entities in our group as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data.

We may also share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business.

We may share information about you with our regulators, such as the Care Quality Commission (<https://www.cqc.org.uk/about-us/our-policies/privacy-statement>), the Information Commissioner's Office (<https://ico.org.uk/global/privacy-notice/>), the Department of Health (<https://www.gov.uk/help/privacy-notice>) and the Health and Safety Executive (<https://www.hse.gov.uk/privacy.htm>).

Where we store your personal information and for how long, and how secure is it?

The information about you that we hold and use is held securely in the United Kingdom and the EU and stored in paper format and on our or NHS secure servers (or third party information technology providers).

We will not keep your personal information for longer than is necessary for the purpose. This is to ensure that information is properly managed and is available whenever and wherever there is a justified need for that information. Information is retained for specified periods (depending on the record) under our document retention policy. Please contact us if you would like further information about how long we retain information.

We will ensure that appropriate measures are taken against unlawful or unauthorised processing of personal information, and against the accidental loss of, or damage to, personal data. Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

What are your rights?

The law provides you with certain rights in relation to the information about you that we hold.

There will not usually be a charge for handling a request to exercise your rights and if we cannot comply with your request, we will usually tell you why. If you make a large number of requests or it is clear it is not reasonable for us to comply with a request, then we do not need to respond or we can charge for doing so.

Right of access - You have the right to access information held about you. This includes details of the information we hold about you and a copy of that information. The information will be provided free of charge and, unless there are grounds for extending the statutory deadline, the information will be provided to you within one month of receipt of your request. Please note we will generally also ask for confirmation of your identity and may need further information from you in order to locate the information, in which case the time period starts from the date we have that detail. Please note that in some cases we may not be able to comply fully with your request, such as where your request also involves information about someone else and it would not be fair to that other person to provide the information to you.

Right to rectification - We take reasonable steps to ensure the information we hold about you is both accurate and complete. However, you are entitled to have the information rectified if that is not the case. Unless there are grounds for extending the statutory deadline, we will respond within one month of receipt of a rectification request.

Right to erasure (sometimes referred to as the right to be 'forgotten') - In some circumstances, you have a right to have information about you 'erased' and to prevent us using or holding information about you. Please note that we do not have to comply with such a request where it is necessary to keep your information in order for us to perform tasks which are in the public interest (including public health) or for the purposes of establishing, making or defending legal claims. If you make such a request and we comply with it, please be aware that we will retain a note of your name, the request made and the date we complied with it.

Right to restrict processing - In some situations, you have a right to 'block' or suppress our holding or using information about you. As with the right to erasure, please note that we do not have to comply with such a request where it is necessary to keep your information in order for us to perform tasks which are in the public interest (including public health) or for the purposes of establishing, making or defending legal claims.

Right to data portability - You have the right to obtain and re-use your personal data for your own purposes across different services, allowing you to move, copy or transfer personal data from one IT environment to another. This right, however, only applies to personal data you have provided to us, where the processing is based on your consent or for the performance of a contract; and when the processing is carried out by automated means.

Rights relating to automated decision making - You have the right not to be subject to a decision when it is based on automated processing (i.e. by a computer alone), and it produces a legal effect or a similarly significant effect on you.

Right to withdraw consent - You have the right to withdraw consent to us holding or using information about you, but only if 'consent' is the basis for us holding or using your information.

Right to object - You have the right to object to us holding or using information about you in certain situations – where this is based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling); direct marketing (including profiling); and processing for purposes of scientific/historical research and statistics.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Data Protection Officer in writing. She may be contacted at 2 Imperial Place, Maxwell Road, Borehamwood, WD6 1JN or email Data.Subject.Request@elysiumhealthcare.co.uk.

Complaints to the Information Commissioner's Office

You can complain to the Information Commissioner's Office (ICO) if you are unhappy with the way we have dealt with a request from you to exercise any of your rights or if you think we have not complied with our legal obligations. Whilst you do not have to do so, we would appreciate you making us aware of the issue and giving us an opportunity to respond and to address it before contacting the ICO.

Making a complaint will not affect any other legal rights or remedies that you have. More information can be found on the ICO website: <https://ico.org.uk/> and the Information Commissioner's Office can be contacted by post, phone, fax or email as follows: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. Tel: 0303 123 1113 (local rate) or 01625 545 745 9 (national rate number); Fax: 01625 524 510; Email: casework@ico.org.uk

Keeping us informed

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes.

Data protection officer

We have appointed a data protection officer to oversee compliance with this privacy notice. If you would like to know more about anything we have said here, have any questions, or would like to exercise any rights set out in this Privacy Notice, please contact our Data Protection Officer at 2 Imperial Place, Maxwell Road, Borehamwood, WD6 1JN; Telephone: 020 8237 1800; or email IG.Info@elysiumhealthcare.co.uk. You may also contact her if you are not happy with the way we have handled your personal information.