

# Website Privacy Notice

This privacy notice sets out important information about how we will collect and use personal information about you when you visit our websites, use our applications or go on our social media pages (regardless of where you visit it from) (each a website). This notice also describes what legal rights you have when we handle your information.

Our website is not intended for children and we do not knowingly collect information relating to children through our website.

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 visits and activities on our website. This may be information about you that you give us by filling in forms on our website [www.elysiumhealthcare.co.uk](http://www.elysiumhealthcare.co.uk), if you submit your contact information on our site, or if you report a problem with our website. Personal information may include:

- Identity Data such as first name, last name, username or similar identifier. It might also include referrals and admissions data.
- Contact Data such as postal address, email address and telephone numbers.

- Transaction Data such as details of services we have provided or are providing to you.
- Technical Data such as 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. For more information about the cookies we use, please see our cookie policy, available at: <https://www.elysiumhealthcare.co.uk/our-gdpr-policies/>.
- Usage Data such as information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), page response times, length of visits to certain pages, methods used to browse away from the page, and any phone number used to call our customer service number.

We may also collect Special Categories of Personal Data about you such as details about your health.

We may also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does 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.

## How is your personal information collected?

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

Direct interactions. You may give us your Identity or Contact Data by filling in forms or by corresponding with us through the website or by post, phone, or email. This includes personal data you provide when you:

- apply for our services;
- subscribe to our service, publications or newsletters;
- enter a competition, promotion or survey; or
- give us some feedback.

Automated technologies or interactions. As you interact with our website, we may 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 collect information from or about the phones or other devices where you install or access our services, depending on the permissions you've granted. We may associate the information we collect from your different devices, which helps us provide consistent services across your devices. Here are some examples of the device information we may collect:

- Attributes such as the operating system, hardware version, device settings, file and software names and types, battery and signal strength, and device identifiers.
- Device locations, including specific geographic locations, such as through GPS, Bluetooth, or WiFi signals.
- Connection information such as the name of your mobile operator or ISP, browser type, language and time zone, mobile phone number and IP address.

Third parties or publicly available sources. This is information we receive about you if you provide your information to use through a third party, for example, referral information from GPs or other healthcare professionals (this includes Special Categories of Personal Data), Facebook, Twitter, or LinkedIn. In this

case, you will have been informed when your data was collected of the purpose for which we were collecting it. We will only use your information collected from third parties for the purpose for which we collected it.

## How will we use information about you?

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

- Where we need to perform the contract we have entered into with you.
- Where we need to comply with a legal obligation or regulatory obligation or in connection with legal proceedings.
- 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.

We may use information about you where you have provided your consent to us doing so.

We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to protect your interests (or someone else's interests).
- Where it is needed in the public interest.

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

- In limited circumstances, with your explicit written consent.
- Where we need to carry out our legal obligations.
- Where it is needed in the public interest.
- Where it is necessary for medical or healthcare purposes.

Less commonly, we may process your information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

## Situations in which we will use your personal information

The situations in which we will process your personal information are listed below.

- To register you as a new customer or service user.
- To carry out our obligations arising from any contracts entered into between you and us and to provide you with the information and services that you request from us.
- To notify you about aspects of or changes to our service.
- To manage our relationship with you.
- To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).
- To use data analytics to improve our website, products/services, marketing, customer relationships and experiences.
- To discuss any enquiries from you or referrals you have made and to direct service users to the most appropriate location or service provided by us.

We will only use your personal information 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 we need to use your personal information 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 information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

We do not make decisions that have a significant impact on you based on automated decision-making.

## Do we use cookies?

Yes, we do. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookie policy, available at: <https://www.elysiumhealthcare.co.uk/our-gdpr-policies/>.

## Do we share information about you to others?

Yes we do. We may share your information with others, and in each case we will do so appropriately.

We may share information about you to selected third parties assisting with the optimisation of, or hosting, our website and search engine providers that assist us in the improvement and optimisation of our site.

We may share information about you with external organisations such as our lawyers, auditors, financial, tax and public relations advisors and NHS organisations.

We may share information about you with third party suppliers, for example in relation to workforce management services, employee benefits schemes, including health, pension and life assurance schemes, information technology systems, electronic learning programmes, document storage or shredding facilities.

We may share information about you with service users, their families and advisers. This may be to respond to questions, complaints or claims, including from you. In each case, we would share only such information as is relevant.

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, Department of Education, Ofsted (<https://www.gov.uk/help/privacy-notice>), and the Health and Safety Executive (<https://www.hse.gov.uk/privacy.htm>).

We may also share information because of a legal obligation, such as a court order. Before any disclosure will be made, we will satisfy ourselves that any disclosure sought is required by law or can be justified in the public interest. Information about you may also be shared with the police and other third parties where reasonably necessary for the prevention or detection of crime.

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.

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 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 secure servers (or those of our third party information technology provider).

Many of our external third parties are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA.

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](mailto: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](mailto: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](mailto:IG.Info@elysiumhealthcare.co.uk). You may also contact her if you are not happy with the way we have handled your personal information.