THE ABBEYFIELD BASILDON SOCIETY LIMITED

PRIVACY POLICY

We give a very high priority to the privacy of our residents and that includes their personal data.

Personal data is any information about you, such as your date of birth, your address, a photograph, bank details and medical information.

We have to collect, keep and use personal data about our residents in order to effectively run our Houses and provide our services.

We promise to use your personal data only to the extent necessary to pursue those interests, to comply with our obligations, to safeguard our interests or to make sure that we are meeting our responsibilities to you and others.

Consent is not required to process personal data unless it is a special type of personal data, as explained below, in which case it may be needed.

SPECIAL TYPES OF PERSONAL DATA

There are certain categories of personal data which are classified as special, such as personal data revealing racial or ethnic origin or religious beliefs and data concerning health.

Abbeyfield Basildon will not process special categories of personal data except where a resident has given written consent to the processing for a specified purpose or the processing is necessary for carrying out legal obligations or exercising legal rights in connection with social security or social protection or the processing is necessary for medical diagnosis/treatment.

Medical information in particular is very sensitive and we ask all of our residents to confirm their consent to the processing of this information before they come to live with us. It may be vital to a resident's interests that we are able to process this data. To give an example, we might need to provide medical information to emergency services for treatment purposes or to Social Services for a care needs assessment.

PERSONAL DATA RELATING TO CRIMINAL CONVICTIONS AND OFFENCES

Abbeyfield Basildon will not process personal data relating to criminal convictions and offences unless a resident has given explicit consent to the processing for a specified purpose or the processing is necessary for the purposes of performing obligations imposed by law on Abbeyfield Basildon in connection with social security or social protection.

HOW LONG PERSONAL DATA CAN BE STORED FOR

Personal data will be stored by Abbeyfield Basildon for as long as may be required for the purposes for which it is processed. This may be throughout the time that you are living with us and also for as long as may be necessary in connection with any legal limitation period. Abbeyfield Basildon will monitor data held to ensure its secure deletion and destruction when it is no longer required.

YOUR RIGHT OF ACCESS TO PERSONAL DATA

You have the right to access personal data and to be provided, without undue delay, with a copy of your personal data which is being processed unless there is an exemption meaning that particular data is not required to be disclosed. Where a copy of personal data is requested, this will be provided free of charge unless the request is excessive. This will normally be provided within a month of the request being received although a longer period may be needed if the request is complex.

YOUR RIGHT TO RECTIFICATION

If any data about you is inaccurate, you have the right to obtain rectification without undue delay.

YOUR RIGHT TO ERASURE

You have the right to obtain erasure of your personal data without undue delay in certain circumstances. Examples are where the data is no longer necessary in relation to the purposes for which it was processed or where you object to processing and Abbeyfield Basildon does not have overriding legitimate grounds for the processing. Abbeyfield Basildon may also be able to insist on retaining data for

compliance with a legal obligation or in connection with legal claims or for other permitted purposes.

YOUR RIGHT TO OBJECT TO PROCESSING

You have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data. Abbeyfield Basildon will, however, be permitted to continue processing the data if we can show overriding legitimate grounds for the processing or the processing is necessary in connection with legal claims.

YOUR RIGHT TO WITHDRAW CONSENT TO THE PROCESSING OF PERSONAL DATA

If, in the case of processing a special category of personal data, Abbeyfield Basildon has considered it necessary to obtain an explicit consent to the processing, then you may withdraw that consent at any time by written notification to the Data Protection Officer.

YOUR RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY

If you consider that the processing of personal data relating to you has infringed your rights as explained in the Data Protection Policy, then you have the right to lodge a complaint with the Information Commissioner's Office.

AUTOMATED DECISION MAKING

Abbeyfield Basildon does not take any decisions significantly affecting residents which are based solely upon automated processing of data. You will be advised if any such decision is to be taken in the future and of the basis for that decision.

THE COMPANY'S DATA PROTECTION OFFICER

Abbeyfield Basildon's Data Protection Officer is one of the Trustees, Sean Stanton-Dunne. The Data Protection Officer is responsible for managing the effective implementation and operation of the Data Protection Policy. If you have any

questions about the Policy or any concerns about a data protection issue, then you should address these to the Data Protection Officer.

PERSONAL DATA BREACHES

The following procedure applies where there is a personal data breach. A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss or alteration of personal data or the unauthorised disclosure of, or access to, personal data. An example of a personal data breach is where an e-mail containing information about someone is sent to the wrong person. If you become aware of a personal data breach, please report this straight away to the House Manager who will then pass the information to the Data Protection Officer.