



**Halcyon
Care Homes**
Part of Anchor

Visitor Privacy Notice

All personal information about you will be under the control of Anchor Hanover Group (Anchor) acting as Data Controller and will be processed in line with applicable UK (United Kingdom) data protection legislation including, but not limited to, the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (the DPA). Anchor is registered with the Information Commissioner's Office (ICO) and our registration number is Z7000835.

This document tells you about the sort of personal information we collect and how it will be used by us.

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Who does the privacy notice apply to?

This privacy notice applies to all applicants, employees on permanent, temporary, or fixed term contracts including bank staff; workers, contractors; agents; representatives and volunteers acting for or on behalf of Anchor.

In this notice:

- What is personal information?
- What information do we hold for visitors?
- How do we collect your personal information?
- How do we use your personal information?
- What information do we ask for, and why?
- The purpose and lawful basis for processing your information
- Your rights in relation to this processing
- Who do we share information with?
- How we secure your information
- How long is your personal information kept for?
- Your rights as a data subject
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What is personal information?

Personal information is information about someone which allows that person to be identified. Examples of personal information that we may request and hold about you include:

- Your full name
- Address and contact details
- Vehicle registration
- Proof of your identity

What information do we hold for visitors?

Depending on the nature of your visit we may keep a record of:

- Your contact with us (phone, email, social media, writing or in person)
- CCTV images
- Call recordings
- Other images when you have agreed for these to be shared for social media purposes
- Health screening information captured to protect our residents and colleagues.
- Vehicle registration

For visitors to our website further information is available in the terms and conditions and Cookie Policy.

How do we collect your personal information?

- Directly from you
- CCTV images taken using our own CCTV systems.

Such information may be collected over the phone; by face-to-face contact; when receiving written correspondence; or electronic correspondence such as

e-mails, faxes, online application forms, questionnaires, and text messages.

How do we use your personal information?

Our main legal basis for processing personal information is with your consent or where it is necessary for the purpose of the legitimate interests pursued by Anchor. These include to improve customer service and for the security and health and safety of Residents, Staff and Visitors to our sites. We will use the information that you provide for varied reasons and different legal bases may apply depending on the reason for which we have collected or obtained your personal information. The main reasons we process your information are to:

- Respond to your enquiry or complaint
- For organising and assisting community events
- To manage a contract, we may have with you
- For security and health and safety reasons
- To meet our legal obligations
- We operate an email mailing list program, used to inform subscribers about products, services and/or news we supply/publish. Users can subscribe through an online automated process and can unsubscribe at any time through the automated online service or via the unsubscribe link in any marketing emails.

What information do we ask for, and why?

We do not collect more information than we need to fulfil our stated purposes and will not keep it longer than necessary.

Details of what information we collect, and store can be found in **Appendix A for Visitors**.

The purpose and lawful basis for processing your information

Depending on the processing activity, we rely on the following lawful basis for processing your personal information under the UK GDPR:

- Article 6(1)(a) which relates to processing where you have given us your explicit consent for one or more purposes
- Article 6(1)(b) which relates to processing necessary for the performance of a contract.
- Article 6(1)(d) to protect your vital interests or those of another person.
- Article 6(1)(f) for the purposes of our legitimate interest to manage a complaint or enquiry

Special category data

Where the information we process is special category data, for example your health data, the additional bases for processing that we rely on are:

- Article 9(2)(a) which relies on your explicit consent.

Your rights in relation to this processing

As an individual you have certain rights regarding our processing of your personal information, including a right to lodge a complaint with the Information Commissioner's Office as the relevant supervisory authority.

More information about your individual rights is detailed in the Section Your rights as a data subject.

Who do we share information with?

Your personal information will be kept secure and confidential. Our employees have restricted access to personal information on a 'need to know' basis. There may be times when we share information about you with other organisations for example, in the event of an emergency at the location you are visiting. The information we share with others will be the minimum necessary to enable them to carry out their task. Examples of who we may share your information with include but are not limited to:

- Emergency Services
- Our regulators who require your personal information to assure them that the services we provide to you comply with essential standards of safety and quality.
- Those who require your personal information to protect the vital interests of an individual (in a life-or-death situation)

The information we share with others will be the minimum necessary to enable them to carry out their task. Anchor may also share information with others where we believe it is in your, or the public's interested to do so, such as to keep residents, staff, or visitors safe, or as required by law.

We will not transfer your personal information outside of the United Kingdom or European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal information.

We will ensure that anyone we pass personal information to agrees to treat it securely and confidentially and to use or process it solely for the reasons it is provided.

How we secure your information

Anchor operates a robust process protecting new and existing systems. Your information is protected by multiple layers of security.

Your information is available to our employees on a strictly need to know basis.

Anchor is based in the United Kingdom and most of our information is stored within either the United Kingdom or European Union.

How long is your personal information kept for?

We will only use and store your information for as long as it is required for the purposes it was collected for. How long information will be stored for depends on what it is being used for. Sometimes we may also need to keep information for statutory or regulatory purposes or to deal with any legal claims.

We usually keep:

- Recordings of telephone calls and CCTV images for 28 days

Your personnel file will be retained for a maximum of 6 years after you have left Anchor unless it is required to be kept for a longer or shorter period by law. For applicants that have not been short listed, we retain personal information (outlined in Appendix A) for 6 months after the position is filled. For applicants that are shortlisted but unsuccessful, personal information is retained for 1 year after the position is filled. Volunteer's information is stored for 1 year once you cease to be a volunteer at Anchor.

Your rights as a data subject

At any point while we are in possession of or processing your personal information, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct information that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the information we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply you have a right to restrict the processing.
- Right of portability – you have the right to have the information we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you have the right not to be subject to the legal effects of a decision based solely on automated processing or profiling.
- Right to judicial review: if Anchor refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in the clause below.

Can I find out the personal information that Anchor holds about me?

Anchor at your request can confirm what information we hold about you and how it is processed. If Anchor does hold personal information about you, you can request the following information:

- The purpose and legal basis for processing
- If the processing is based on the legitimate interests of Anchor or a third party, information about those interests
- The categories of personal information collected, stored, and processed
- The recipient(s) or categories of recipients that the information is/will be disclosed to
- If we intend to transfer the personal information to a third party or international organisation, information about how we ensure this is done securely
- How long the information will be stored
- Information about your right to withdraw consent at any time
- Whether the provision of personal information is a statutory or contractual requirement, or a requirement necessary to enter a contract, as well as whether you are obliged to provide the personal information and the possible consequences of failing to provide such information
- The source of personal information if it was not collected directly from you; and
- Any details regarding automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing

If we need to establish your identity before responding to a request to exercise your rights, we may request that you provide us with ID, for example passport, driving licence,

birth certificate or utility bill (within the last three months).

You can exercise any of your information rights by contacting the Data Protection Team using the details provided in the 'How to contact us' Section. This can be a verbal request, in writing, via email or by completing one of our bespoke forms. You may also ask someone to do this on your behalf. Contact us by using the details below. No charge will be made for this service.

Complaints

If you wish to make a complaint about how your personal information is being processed by Anchor or any of our third parties, or how your complaint has been handled, please contact our Data Protection Officer using the details provided in the 'How to contact us' Section.

You also have the right to complain to the ICO about how we have processed your personal information. The ICO can be contacted at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, by telephone on **0303 123 1113** or through the website **www.ico.org.uk**.

How to contact us

You can contact us in the following ways to discuss any aspect of this notice or about the information we hold about you:

- Writing to the Data Protection Officer at Anchor Hanover Group, 2 Godwin St, Bradford BD1 2ST
- Email us at **data.protection@anchor.org.uk**
- Telephoning the Data Protection Team on **01274 026141**

This privacy notice may change from time to time.

Appendix A – Visitor information

What data we collect	What we do with it
Your name, address, and contact details, including email address and telephone number.	To correspond with you.
Recording of calls	To assess your suitability for employment and to request references should we decide to make you an offer.
	To keep records of our hiring process
Name and contact details, internet protocol (IP) address, and Uniform Resource Locators (URLs) when visiting our website	Confirmation of your identity
When required by regulations or to reduce the risk of certain contagions, we may also capture and hold health screening information	To check your right to work in the UK and enter into a contract with you
CCTV Images	To ensure the suitability of individuals for certain positions
Images for social media	To meet government and regulatory requirements