

# PRIVACY NOTICE

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<b>Owner</b>	Karen Thornton - Associate Director
<b>Approved by</b>	Jane O'Rourke – DPO/ Quality and Compliance Team Lead
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## 1 General

Care 24-7 Limited ('Care 24-7') is committed to protecting all personal, special, and criminal categories of data held on you. As a 'controller' of personal information we are responsible for how that data is managed.

As such, Care 24-7 wants you, the 'data subject', to understand how Care 24-7 collects, uses, stores, and shares your personal data. Care 24-7 also wants you understand what rights you can invoke to help you to protect your privacy. In this regard, it is important that you read this Privacy Notice and understand how Care 24-7 uses your personal data. Please note that Care 24-7 reserves the right to update this Privacy Notice as required. The most recent version of this document can be found on Care 24-7's website through the following link: <https://www.care247.ltd.uk/privacy-policy/>

### 1.1 Care 24-7 Information

Care 24-7 is a leading supplier of high quality and innovative homecare solutions within the UK. Care 24-7 provides innovative workforce managed services solutions and managed staffing solutions to clients. At Care 24-7 we are committed to providing a service of excellence. This means providing high quality, safe and effective care which treats people with compassion, dignity and respect.

If you wish to locate further information on Care 24-7, you can find this on the website through the following link: <https://www.care247.ltd.uk/>

### 1.2 Legislation

All personal data processed by Care 24-7 is done so in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

### 1.3 Queries and Complaints

If you are unhappy with the way Care 24-7 handles your personal data and wish to complain, or if you simply want further information about the way your personal data will be used, please contact Care 24-7's Data Protection Officer at the below:

**Jane O'Rourke**

**Email: [JORourke@servisource.ie](mailto:JORourke@servisource.ie)**

**Telephone: +353 42 936 8377**

**Ireland**

We hope we can resolve any query or concern you raise about our use of your information, however if you are dissatisfied with our response GDPR also gives you right to lodge a complaint with a supervisory authority. The supervisory authority in the U.K. is the

Information Commissioner who may be contacted at <https://ico.org.uk/make-a-complaint/> or telephone 0303 123 1113.

#### 1.4 Breaches

Care 24-7 will take all appropriate technical and organisational steps to safeguard your personal data. In the unlikely event of a data breach, Care 24-7 will contact you in line with Care 24-7's legal obligations.

## 2 How Does Care 24-7 Collect Information?

Care 24-7 collects personal data to enable the provision of services to support the Care 24-7 purpose. The following non-exhaustive methods of data collection are an indication of ways in which Care 24-7 may obtain your information:

- Obtain personal data directly from you;
- Personal data that Care 24-7 receives from other sources; and
- When entering Care 24-7's premises, you will be recorded on the Visitor Sign In tablet/book for security purposes.

It is important that the personal data you provide Care 24-7 is up to date and accurate. As outlined in Section 7.4 of this notice, if personal data Care 24-7 holds on you is inaccurate or incomplete, please contact Care 24-7 and we will update the information.

### 3 What Does Care 24-7 Use Information For?

#### 3.1 Process, Purpose, and Lawful Basis

Care 24-7 uses personal data collected to fulfil Care 24-7’s obligations to provide recruitment services and to enable the provision of services to support Care 24-7’s purpose.

Care 24-7 uses personal data for any of the following purposes:

Process	Purpose	Lawful Basis
<b>Pre-Recruitment</b>	To register a prospective data subject’s interest in recruitment for employment.	Processing is necessary in order to take steps at the request of the data subject prior to entering into a contract.  The processing is necessary for the exercise of rights and obligations under employment law.
<b>Background Checks</b>	To verify if the data subject is qualified and eligible for certain positions within Care 24-7.	Processing is necessary for compliance with a legal obligation to which Care 24-7 is subject.
<b>Recruitment and Selection</b>	To complete the recruitment process and assess data subject suitability.	Processing is necessary in order to take steps at the request of the data subject prior to entering into a contract.  Processing relates to Care 24-7’s obligations in employment and for assessing data subject’s work capacity.
<b>Pension</b>	To administer data subjects pension entitlements and to comply with pension rules.	To comply with various pension laws.  Processing is necessary for the performance of a contract to which the data subject is party.
<b>Payroll</b>	To enable Care 24-7 to effect payment to the data subject.	Processing is necessary for the performance of a contract to which the data subject is party.

<b>Personnel File</b>	To comply with employment and revenue laws and to ensure that terms and conditions of employment are adhered to.	Processing is necessary for the performance of a contract to which the data subject is party.  To comply with various employment and revenue laws.  To protect the vital interests of the data subject in the event of an accident or emergency.
<b>Time and Attendance Records</b>	To enable the data subject to avail of their rights and entitlement pursuant to the Organisation of Working Time Act 1997.	The processing is necessary for the performance of contract to which the data subject is party.
<b>Statutory Entitlement</b>	To enable Care 24-7 to achieve compliance with: <ul style="list-style-type: none"> <li>• Its obligation to the data subject;</li> <li>• Record keeping obligations pursuant to a variety of employment law statutes.</li> </ul>	The processing is necessary for compliance with legal obligation to which Care 24-7 is subject.
<b>Training Records</b>	To ensure that Care 24-7 is in a position to assess the data subject's training needs and to capture proof of training.	The processing is necessary for the performance of contract to which the data subject is party.
<b>Performance Details</b>	To manage the data subject's performance in accordance with relevant Care 24-7 policies.	The processing is necessary for the performance of contract to which the data subject is party.
<b>Grievance and Disciplinary</b>	To ensure the data subject's complaints are fairly investigated in accordance with Care 24-7 policies.	To comply with Care 24-7's legal obligation to apply fair procedures to any data subject's investigation.  The processing is necessary for the performance of contract to which the data subject is party.
<b>Medical Information</b>	To manage the data subject's absences, to manage sick pay in accordance with the contract of	Processing is necessary to assess, subject to data subject

	employment, and to manage the fitness to work of data subjects.	safeguards, the working capacity of the data subject.  To carry out obligations and exercise rights under employment law.
<b>Making or Receiving Payments</b>	To make or receive any payments in the discharge of normal business functions, dispute settlement, or to carry out any other payment requirements.	Processing is necessary for compliance with various employment and revenue laws.  The processing is necessary for the performance of contract to which the data subject is party.
<b>Regulatory Compliance</b>	To comply with financial regulations and any other relevant laws and regulations.	Processing is necessary for compliance with a legal obligation to which Care 24-7 is subject.  Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
<b>Third Party Data Sharing</b>	To allow Care 24-7 to conduct and carry out functions with third party service providers that enable Care 24-7 to deliver services.	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
<b>Back-ups</b>	To store personal data and make back-ups of that data in case of emergencies and for disaster recovery purposes.	Processing is necessary for compliance with a legal obligation to which the Care 24-7 is subject.
<b>Evidence Submissions</b>	To gather information for dispute resolution services and legal proceedings.	Processing is necessary for compliance with a legal obligation to which the Care 24-7 is subject.

<b>Transfer of Information for Parties Legal Proceedings</b>	To allow parties to commence legal proceedings.	Processing is necessary for compliance with a legal obligation to which the Care 24-7 is subject.
<b>Accidents and Incidents</b>	To enable Care 24-7 to comply with employee record keeping obligation pursuant to the Safety, Health, and Welfare Act 2005.	Processing is necessary for compliance with a legal obligation to which the Care 24-7 is subject.

## 4 Who Does Care 24-7 Share Information With?

Care 24-7 may share personal data with other parties in the course of Care 24-7’s duties. When this is done, Care 24-7 adheres to the following principles:

- The transfer is based on a legal obligation, the performance of a contract, or explicit consent.
- Where data is transferred to another party, Care 24-7 ensures appropriate technical and organisational safeguards are used to protect your personal data.
- Where Care 24-7 engages a third party to provide a service to Care 24-7, Care 24-7 ensures the provider has taken appropriate technical and organisational measures to process, store, and safeguard your personal data.
- Care 24-7, as a Data Controller, will not sell your data to any third party and will take all appropriate steps to ensure the security of your data in dealings with third parties.

While the parties Care 24-7 engage with may change occasionally, Care 24-7 believe it is important you are aware of the types of parties we share data with. The categories and types of third parties outlined below is a non-exhaustive list but provides an indication of the parties Care 24-7 shares data with.

### 4.1 Other Third Parties

Third parties for the purposes of internal and external audits, carrying out research, general practitioners, and or third parties who may improve Care 24-7’s processes and services (such as consultants and the CQC).



## 4.2 Government Departments, Bodies or Agencies

Care 24-7 is legally obligated to share personal data with state actors which is outlined in the Data Protection Act 2018. This is based on the General Data Protection Regulation (GDPR), which applies to the United Kingdom and across the European Union.

Recipients of this data include Government departments, agencies, bodies, investigatory bodies, local authorities, and the Police.

## 4.3 International Transfers

Where personal data is transferred outside the European Economic Area, Care 24-7 use safeguards known as Standard Contractual Clauses (SCCs).

## 5 What Type of Information is Collected?

To fulfil Care 24-7’s mandate and perform tasks as outlined in this statement, Care 24-7 needs to collect various types of personal data.

While the type of personal data may change occasionally, Care 24-7 believes it is important you are aware of the types of data Care 24-7 gathers and uses. The following table is a non-exhaustive list and provides an indication of the categories and types of data Care 24-7 uses to perform Care 24-7’s tasks.

Please note that information listed under one category may be used for the performance of a task or in relation to activities under another heading or as outlined under Section 3.

Category	Type of Data
Candidates	<ul style="list-style-type: none"> <li>Name, address, date of birth, phone number, email address, work experience, next of kin, bank details, education and training records.</li> <li>Medical data, health screening, health diagnosis, blood test results and immunisations, health / medical declarations.</li> <li>Criminal data.</li> </ul>
Employees	<ul style="list-style-type: none"> <li>First name, last name, date of birth, address, contact details, email address, family details, financial, tax, pension, remuneration details, performance details, visual images details, employee ID, CCTV footage, lifestyle and social circumstances, education, and training details, grievance and</li> </ul>

	<p>disciplinary documents such as incident reports and complaints.</p> <ul style="list-style-type: none"> <li>• Special data such as medical checks, medical records, sick leave details.</li> <li>• Criminal data.</li> </ul>
Clients	<ul style="list-style-type: none"> <li>• Name, address, date of birth, phone number, email address, emergency contacts, lifestyle and social circumstances, bank details.</li> <li>• Medical data, such as allergies or physical or mental conditions in particular to your care needs.</li> </ul>
Other Stakeholders	<ul style="list-style-type: none"> <li>• Contact details, first name last name, email address, images, bank details and payment details.</li> </ul>

## 6 How Long Does Care 24-7 Retain Information?

Care 24-7 has developed a record retention schedule for all the personal data Care 24-7 holds. Each retention period varies dependent on the nature and the purpose of the processing.

The main factors which determine retention periods are as follows:

1. How long it is required to perform the task;
2. Any legal requirements to hold onto the data;
3. Any pending legal actions.

If you would like to see a copy of the Retention Policy, please contact the DPO at [JORourke@servisource.ie](mailto:JORourke@servisource.ie).

## 7 What Are Your Rights?

As a data subject, you will have the following rights as outlined in this section 7. **However, restrictions may apply in certain situations.**

### 7.1 Where do I send requests?

Please send all your requests to the contact details provided in Section 1, with as much detail as possible about your requirements to allow Care 24-7 to deal with your request efficiently. To answer your request, Care 24-7 may ask you to provide identification for verification purposes.

## 7.2 How long will a request take?

Upon receipt of a request, Care 24-7 will have 30 days to provide an answer with an extension of two further months if required. If Care 24-7 requires more time to deal with your request, Care 24-7 will notify you of the delay and the reasons behind it within 30 days of the receipt of the request. If Care 24-7 refuses your request, Care 24-7 will also notify you within 30 days of the receipt of the request accompanied by the reasons for the refusal.

## 7.3 Right of Access

You have a right to know what personal data Care 24-7 hold on you, why Care 24-7 holds the data, and how Care 24-7 is processing your personal data.

When submitting your request, please provide Care 24-7 with information to help verify your identity and provide as much detail as possible to help Care 24-7 understand the information you wish to access (i.e. date range, subject of the request) and email [JORourke@servisource.ie](mailto:JORourke@servisource.ie).

## 7.4 Right to Rectification

You have a right to request that Care 24-7 information held on you is up to date and accurate.

Where information is inaccurate or incomplete, Care 24-7 encourage you to contact Care 24-7 to have this information rectified. Upon receipt of request, Care 24-7 will ensure that the personal data is rectified and as up to date as is reasonably possible.

## 7.5 Right to be Forgotten

You have the right to seek the erasure of your personal data in the following circumstances:

- The personal data is no longer required for the purposes for which it was obtained;
- Where data is being processed on the basis of consent, you withdraw consent to the processing and no other lawful basis exists;
- The personal data is being unlawfully processed;
- You object to the processing of personal data and there are no overriding legitimate grounds for the processing;
- Your personal data requires deletion in line with legal requirements.

However, Care 24-7 will be unable to fulfil an erasure request if the processing of personal data is necessary for the following:

- Exercising the right of freedom of expression and information;
- Compliance with a legal obligation or for the performance of a task carried out in public interest;
- Reasons of public interest in the area of public health;
- Archiving or statistical purposes in the public interest;
- The establishment, exercise, or defence of legal claims;

Please note that where the legal basis for Care 24-7's processing of personal data is on the basis of a legal obligation, some processing in relation to your data may not be subject to the right to erasure.

To determine your request for erasure, Care 24-7 will carry out an assessment of the justification for the retaining your personal data where a legal requirement applies and contact you if Care 24-7 is unable to fulfil your request.

Please be aware that in some circumstances Care 24-7 may need to retain some information to ensure all your preferences are properly respected. For example, Care 24-7 cannot erase all information about you where you have also asked Care 24-7 not to send you marketing material. Otherwise, Care 24-7 would delete your preference not to receive marketing material.

## 7.6 Right to Restriction

You have the right to restrict the extent of personal data processed by Care 24-7 in circumstances where:

- You believe the personal data is not accurate (restriction period will exist until Care 24-7 updates your information);
- The processing of the personal data is unlawful, but you wish to restrict the processing of data rather than erase it;
- Where the personal data is no longer required by Care 24-7, but you require retention of the information for the establishment, exercise, or defence of a legal claim;
- You have a pending objection to the processing of the personal data;

When processing is restricted, your personal data will only be processed: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of other people; or for reasons important to public interest.

## 7.7 Right to Data Portability

You have the right to the provision of all personal data held in relation to you in a structured, commonly used and machine-readable format where:

- Processing is completed on the basis a contract;
- Processing is completed based on consent by the you;
- Processing is carried out by automated means.

You may also request that Care 24-7 sends this personal data to another data controller where technically feasible.

## 7.8 Right to Object

You have the right to object to the processing of your personal data; however, the processing must have been undertaken on the basis of public interest or legitimate interest by Care 24-7.

If you wish to object to the processing of data, please contact Care 24-7 with your request. Care 24-7 will then stop the processing of personal data unless it is required for legal proceedings.