

Purpose

The purpose of this notice is to give you information as to how Hand in Hands collects, stores and processes your personal data.

Policy Statement

Hand in Hands takes the security of personal data very seriously and seeks to be transparent in the way in which it processes data on your behalf. The General Data Protection Regulation 2018 (GDPR) regulates how we store and process personal data.

Personal data is any information relating to a living individual who can be identified by the information directly or indirectly by combining it with other information.

Processing data means how we obtain, record, alter, retrieve, transmit, share or erase your data.

GDPR gives individuals the following rights:

- The right to be informed about how your data will be processed by Hand in Hands.
- The right to access your data and to verify its accuracy.
- The right to rectification if the personal data that we hold is inaccurate or incomplete.
- The right to erase (right to be forgotten). You have the right to request that we erase any information we hold on you.
- The right to restrict processing of personal data.
- The right to portability, for example, any information we hold electronically may be made available to you in an easily readable form that can be copied onto another system.
- The right to object. You are able to tell us that you don't want us to use certain parts of your information for particular purposes.
- The right to lodge a complaint with the Information Commissioners Office (ICO) if you believe we are not processing your data or respecting your rights under GDPR correctly.

Scope (Who does this apply to?)

This privacy notice applies to anyone who interacts with us about our services, in any way, for example, by email, through our website, by phone or by letter.

This privacy notice applies to you if you ask us about our services. It describes how we handle your information, regardless of the way you contact us.

How we collect personal information

Hand in Hands processes two categories of personal information about you:

1. **Standard personal information**, for example, information we use to contact you, identify you or manage our relationship with you; and
2. **Special categories of information**, for example, health information, information about your race, ethnic origin and religion that allows us to tailor your care, and information about crime in connection with checks against fraud or anti-money-laundering registers.

For more information about these categories of information, see below.

Standard personal information includes:

- contact information, for example, your name, username, address, email address and phone numbers;
- the country you live in, your age, your date of birth and national identifiers, for example, your National Insurance number or passport number;
- information about your employment;
- details of any contact we have had with you, for example, any complaints or incidents;
- financial details, for example, details about your payments and your bank details;

Special category information includes:

- information about your physical or mental health, including genetic information or biometric information;
- information about your race, ethnic origin and religion (we may get this information from your medical or care-home preferences to allow us to provide care that is tailored to your needs); and
- information about any criminal convictions and offences (we may get this information when carrying out anti-fraud or anti-money-laundering checks, or other background screening activity).

What we use your personal information for?

Hand in Hands processes your personal information for the purposes set out in this privacy notice. We have also set out some legal reasons why we may process your personal information (these depend on what category of personal information we are processing). We normally process standard personal information if this is necessary to provide the services set out in a contract, it is in our or a third party's legitimate interests or it is required or allowed by any law that applies.

Please see below for more information about this and the reasons why we may need to process special category information.

By law, we must have a lawful reason for processing your personal information. We process standard personal information about you if this is:

- necessary to provide the services set out in a contract – if we have a contract with you, we will process your personal information in order to fulfil that contract;
- required or allowed by law.

We process special category information about you because:

- it is necessary for the purposes of providing health or social care or treatment, or to manage health-care or social-care systems, for example, to monitor whether we are meeting expectations relating to our clinical and non-clinical performance;
- it is necessary for an insurance purpose, for example, advising on, arranging, providing or managing an insurance contract, dealing with a claim made under an insurance contract, or relating to rights and responsibilities arising in connection with an insurance contract or law;
- it is necessary to establish, make or defend legal claims, for example, claims against us for insurance;
- it is necessary for the purposes of preventing or detecting an unlawful act in circumstances where we must carry out checks without your permission so as not to affect the outcome of those checks, for example, anti-fraud and anti-money-laundering checks or to check other unlawful behavior, or carry out investigations with other insurers and third parties for the purpose of detecting fraud;
- it is necessary for a purpose designed to protect the public against dishonesty, malpractice or other seriously improper behavior, for example, investigations in response to a safeguarding concern, a member's complaint or a regulator, for example, the Care Quality Commission (CQC) telling us about an issue;
- it is in the public interest, in line with any laws that apply;
- it is information that you have made public; or
- we have your permission. As is best practice, we will only ask you for permission to process your personal information if there is no other legal reason to process it. If we need to ask for your permission, we will make it clear that this is what we are asking for, and ask you to confirm your choice to give us that permission. If we cannot provide a product or service without your permission, for example, we can't manage and run a health trust without health information, we will make this clear when we ask for your permission. If you later withdraw your permission, we

will no longer be able to provide you with a product or service that relies on having your permission.

Sharing your information

We share your information with funders arranging services on your behalf, with people acting on your behalf, for example, brokers and other agents and with others who help us provide services to you, for example, health-care providers and medical-assistance providers or who we need information from to allow us to handle or confirm claims or entitlements, for example, professional associations. We also share your information in line with the law.

For more information about who we share your information with, please see below.

We sometimes need to share your information with other people or organisations for the purposes set out in this privacy notice.

For all our customers, we share your information with:

- other members of Hand in Hands;
- doctors, clinicians and other health-care professionals, hospitals, clinics and other health-care providers;
- people or organisations we have to, or are allowed to, share your personal information with by law, for example, for fraud-prevention or safeguarding purposes, for example CQC;
- the police and other law-enforcement agencies to help them perform their duties, or with others if we have to do this by law or under a court order;
- if we sell or buy any business or assets, the potential buyer or seller of that business or those assets; and
- a third party who takes over any or all of Hand in Hands assets, for example, personal information we hold about our customers or visitors to the website may be one of the assets the third party takes over.

If we share your personal information, we will make sure appropriate protection is in place to protect your personal information in line with data-protection laws.

We do not share any information outside of the UK.

How long do we keep your information?

Hand in Hands provides services to a wide range of adults and sometimes these individuals have complex needs. Hand in Hands has a records management procedure that details how long we will retain personal data.

We keep your personal information in line with set periods calculated using the following criteria.

- How long you have been a customer with us,
- the types of products or services you have with us, and when you will stop being our customer.

- How long it is reasonable to keep records to show we have met the obligations we have to you and by law.

- Any time limits for making a claim.

- Any periods for keeping information which are set by law or recommended by regulators, professional bodies or associations.

- Any relevant proceedings that apply.

If you need to contact us

If you wish to request any of Hand in Hands Information Governance / GDPR policies or procedures, you have any questions, comments, complaints or suggestions in relation to this notice or to make a Subject Access Request (SAR) please contact:

The Data Protection Officer, Michelle Dudderidge by email michelle@handinhands.co.uk or in writing at Hand in Hands, Unit 5, Devonshire Business Centre, Works Road, Letchworth Garden City, Hertfordshire, SG6 1GJ.

Full details of your rights are available at www.ico.org.uk

You also have a right to make a complaint to your local privacy supervisory authority. As Hand in Hands main establishment is in the UK, the local supervisory authority is the Information Commissioner:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire, United Kingdom
SK9 5AF
Phone: 0303 123 1113 (local rate) or
01625 545 745 (national rate)