# COVISTA®

## **Privacy Notice**

This privacy notice tells you about how we collect and use personal information about you and the rights you have over your personal information held by us. You may be giving this information directly to us or we may receive information about you from a third party with whom you have agreed can share this information with us.

### Who are we?

We are CoVista Living, Our registered address is: The Courtyard Peddars Close, Ixworth, IP31 2HD

We process the personal data that we collect for a number of difference purposes. This privacy notice gives a general overview of how we use personal data.

Who we collect personal data about? We collect personal data about many different people including;

- · People who visit our websites or complete forms on our websites
- · People who receive care and support from us
- · People who receive other services from us
- $\cdot$  Relatives or other individuals who interact with those receiving services from us, including next of kin and bill payers
- · People who contact us with a query or complaint
- · People who have been referred to us from other organisations
- People who visit us or who are recorded on CCTV on our premises
- · Job applicants
- Current and former employees
- Our suppliers or their employees

## Who we collect personal data about?

The data we collect is based on the nature of your relationship with us, it can include;

- · Name, address and contact details including emails
- · Personal and family details including next of kin
- · Identifiers, such as National Insurance Numbers or NHS numbers
- · Lifestyle and social circumstances
- · Banking and financial information
- · Employment and educational details
- · Housing or social care needs
- · Visual images, such as photographs or CCTV recordings

We also collect sensitive personal information (or special categories of data) which include;

- · Racial or ethnic origin
- · Religious or philosophical beliefs
- $\cdot$  Genetic and biometric data
- · Mental or physical health details

We collect equalities data to fulfil our equalities and monitoring obligations.

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## The Types of Personal Data we Collect and use

The data we collect is based on the nature of your relationship with us, it can include;

- · Name, address and contact details including emails
- · Personal and family details including next of kin
- · Identifiers, such as National Insurance Numbers or NHS numbers
- · Lifestyle and social circumstances · Banking and financial information
- · Employment and educational details · Housing or social care needs
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In some instance we will also collect personal data relating to criminal convictions or offences.

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- · Mental or physical health details

We collect equalities data to fulfil our equalities and monitoring obligations.

### Personal Data and Online Enquiries

We will share the information you provide through the online enquiry form with our selected partners to help ensure that your enquiry is dealt with promptly and efficiently. Our partners will not use your information for any other purpose and will delete it as soon as it is no longer needed for this purpose.

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## Collecting Information about Children

We do not knowingly collect personal information from children aged 16 and under except where we may have a legal, contractual or legitimate reason for doing so as part of our business activities.

Children should seek permission from a parent/guardian before providing us with personal information. As a parent/guardian, if you believe we have been provided with personal information without your consent then please contact us at hi@covistaliving.co.uk

## Why do we collect this information?

There are a number of lawful basis under which we collect and process your personal information. The basis upon which we collect your personal information may affect the rights to erasure, right to portability and right to object as set out below. The lawful basis on which we process personal information include:

#### Contractual obligations

Processing your personal information is necessary for us to comply with our contractual obligations. For example:

for the purposes of application for or ongoing employment

- for enquiries about or ongoing provision of our services
- obligations as a data processor under contract with a data controller

#### Legal compliance

We may need to process your personal information if the law requires us to.

#### Vital interest

If processing personal information is required to prevent harm to a person or protect someone's life.

#### Legitimate interest

We may process your personal information to pursue our legitimate interests in a way which might reasonably be expected as part of running our business, including:

- · using your purchase history to send you or make available personalised offers
- · using purchase history of many customers to identify trends or develop new products/services

• using your email or address details to send you direct marketing information for products and services that we think might interest you

- · using your email or address to communicate with you in relation to the services you receive from us
- · keeping you updated with company news and events
- · seek your views or comments on the services we provide;
- · using information to make improvements to our service
- · recovering money that is owed to us for the services that we supply
- · preventing fraud and crime
- · managing our business
- · process enquiries that you have submitted
- $\cdot$  provision of training and feedback for staff

## COVISTA®

### Protecting your Information

We take the security of your personal data seriously. The information you provide to us is subject to our Information Governance policies and procedures which aim to promote an appropriate level of security practice at all levels within Radis. We regularly review these practices.

Measures we take include appropriate user access control, restricting physical and computer access to information systems, use of encryption where practical, pseudonymise/anonymise personal data wherever possible.

## Automated Decision Making and Profiling

We may analyse your personal information to create a profile of your interests and preferences so that we can contact you with information relevant to you. We may also make use of additional information about you from external sources in creating your profile.

We may also use your personal information to detect and reduce fraud and credit risk.

## Sharing your Information

We may pass personal information to other companies within the CoVista Living. We may also pass to third parties who process information on our behalf, who perform services on our behalf or because of a contractual or legal requirement. We may also share elements of personal data as part of a sale or transfer of any part of our business to another party. We will do so after we have received assurances that steps have been taken to protect the personal data by the recipient.

We may disclose information when necessary to prevent risk of harm to an individual.

We will not sell your information to a third party for marketing or sales purposes or for any commercial use without your prior express consent.

## Sharing your Information and Online Enquiries

We will share the information you provide through the online enquiry form with our selected partners to help ensure that your enquiry is dealt with promptly and efficiently. Our partners will not use your information for any other purpose and will delete it as soon as it is no longer needed for this purpose.

## COVISTA®

## Other Countries

We may process or store your information overseas using web services that are hosted outside the European Union (EU). We will seek appropriate safeguards when doing so to protect your privacy rights. We may also receive and respond to contacts made from outside of the EU, for example with bill payers or the relative of a person based in the EU.

## How Long do we keep your Information for?

You have a number of information rights under the GDPR which give you more control over your personal data. These rights include:

Right to access

You have the right to access personal information that we hold about you by making a subject access request. We will explain why if all or any part of the information is to be withheld.

Right to rectification (correction)

You can request that your personal information be corrected if you believe the information we hold about you is incorrect or incomplete.

Inaccurate data is not necessarily the same as a difference of opinion.. If you don't agree with our opinion we will record your view alongside ours.

Right to erasure (to be forgotten)

Under certain circumstances, you have the right to request the deletion or removal of personal information we hold about you. This right is available if the information is no longer covered by a lawful purpose or if we rely on your consent as a lawful basis and you withdraw your consent. We may be required to retain information as required by our Retention Policy and/or in the case of legal claims.

In some cases we may request a reasonable fee based on our administrative costs or be unable to comply if a request is unfounded or excessive.

Right to data portability

You have the right to receive personal information in an electronic format or if technically feasible to have it transferred to another data controller in some circumstances. This right covers information you have provided us under the lawful basis of consent and where the information is stored in an electronic format that has not been anonymised.

Right to restrict processing

You have the right to restrict the processing of your personal data if you have issues with the content of the information we hold or disagree with how we have processed your information.



Right to withdraw consent

Where you have given consent for us to collect and use your personal information (for example, when you subscribe to a mailing list) you can change your mind and withdraw that consent and stop the further use of it for those purposes. This does not apply if we have collected your personal data in line with our legal obligations or other lawful basis for processing.

### Cookies

'Cookies' are small text files that record information on your computer about the websites you visit and how you use them. Our website uses cookies to help us understand who is visiting our website, how they interact with it. We do not track your actions outside of our website and do not access any information stored in cookies placed on your machine by other websites.

You can prevent cookies from being stored on your computer by following instructions on your Internet browser. If you do prevent our cookies you may not be able to access certain services or features on our website.

## Links to Other Websites

This Privacy Notice does not cover links within CoVista Living websites to other externally operated websites. If you transfer to another site, please read the Privacy Notice relating to their website. We do not take responsibility for the privacy practices of third party sites.

### Contact us

If you have any questions regarding this notice or the processing of your personal data by Radis, please contact our Data Protection Officer:

By email: hi@covistaliving.co.uk

In writing: Data Protection Officer, The Courtyard Peddars Close, Ixworth, IP31 2HD

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## Your Right to Complain

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

You can contact them by;

Calling 0303 123 1113. Online at ico.org.uk/concerns (please note we can't be responsible for the content of external websites)

If you are based outside the UK, you have the right to lodge your complaint with the relevant data protection regulator in your country of residence.