

We are TLC Care at Home Ltd, a company registered in England. Our company number is 09390359 and our registered address is as follows:

Compass House, 58 Load Street, Bewdley, Dy12 2AP.

Our promise to you

We respect your privacy and comply with data protection law whenever we process your data. The law says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that We have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes We have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes We have told you about.
6. Kept securely.

At TLC Care at Home Ltd we are committed to ensuring that your privacy is protected. We comply with the UK General Data Protection Regulation (“**UK GDPR**”) unless and until the UK GDPR is no longer directly applicable in the UK. We also follow all national implementing laws, regulations and secondary legislation as amended or updated from time to time in the UK, and any successor legislation to the UK GDPR and the DPA (together “**Data Protection Legislation**”). We are the data controller of data you pass to us pursuant to this policy. Our Data Protection Officer can be contacted at jacqui@tlc-careathome.co.uk.

This Privacy Policy together with our website terms and conditions and cookie policy, sets out how we collect personal information from you and how the personal information you provide will be processed by us. By visiting our website at, you are accepting and consenting to the practices described in this Privacy Policy. If you do not consent, please do not submit any personal data to us.

What information does TLC Care at Home Ltd hold and how will we use it?

- Information you give TLC Care at Home Ltd: You may give us information about you by completing enquiry forms on the website or by requesting via the website that we send you marketing information, including Name and job title.
- Contact information including email address.
- Demographic information such as postcode, preferences, and interests
- Other information relevant to customer surveys and/or offers.

We will retain this information while we are corresponding with you or providing services to you or to a client you represent, or while processing a job application.

We will only collect data for specified explicit and legitimate use in relation to the recruitment process and care enquiry. By filling in forms on this website, you consent to us holding the information contained within the forms submitted to TLC Care at Home. If successfully shortlisted, data will also include shortlisting scoring and interview records. We would like to keep this data until the vacancy is filled. (We cannot estimate the exact time period, but we will consider this period over when a candidate accepts our job offer for the position for which we are considering you. When that period is over, we will either delete your data or inform you that we would like to keep it in our database for future roles.

You have a right for your data to be forgotten, to rectify or access data, to restrict processing, to withdraw consent and to be kept informed about the processing of your data. If you would like to discuss this further or withdraw your consent at any time, please contact the Registered Manager to discuss this further.

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction, and abuse. We have implemented processes to guard against such.

National Data Opt-Out:

TLC Care at Home reviews all of our data processing on an annual basis to assess if the national data opt-out applies. This is recorded in our Record of Processing Activities. All new processing is assessed to see if the national data opt-out applies.

Retention Periods

We only keep your data for as long as we need it for, which, in relation to unsuccessful candidates, is six months to a year.

If your application is not successful and we have not sought consent or you have not provided consent upon our request to keep your data for the purpose of future suitable job vacancies, we will keep your data for six months once the recruitment exercise ends.

If we have sought your consent to keep your data on file for future job vacancies, and you have provided consent, we will keep your data for nine months once the recruitment exercise ends. At the end of this period, we will delete or destroy your data, unless you have already withdrawn your consent to our processing of your data in which case it will be deleted or destroyed upon your withdrawal of consent.

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data and there will be no consequences of withdrawing consent.

If your application is successful, your data will be kept and transferred to the systems we administer for employees. We have a separate privacy notice for employees, which will be provided to you.

Record	Statutory Retention
Staff rota records will be archived in a safe place, with the contents recorded on the outer package.	6 years after due date which they relate to.
Records of TLC staff will be archived in a safe place, with the contents recorded on the outer package.	6 years from the end of the scheme year.
Employee records will be archived in a safe place, with the name of the employee recorded on the outer packaging.	6 years.
Record	Recommended Retention
Assessment under health and safety regulations and records of consultations with safety representatives and committees.	Permanently.
HRMC approvals.	Permanently.
Money purchase details.	6 years after due date which they relate to.
Parental leave.	6 years after due date which they relate to.
Pension scheme investment policies.	6 years after due date which they relate to.
Pensioners' records.	6 years after due date which they relate to.
Personnel files, training records (disciplinary records, and working time records).	6 years after due date which they relate to.
Redundancy details, calculations of payments, refunds, and notification to the Secretary of State.	6 years after due date which they relate to.
Statutory sick pay records, calculations, certificates, and self-certificates.	6 years after due date which they relate to.
Timecards.	6 years after audit date.
Trade Union agreements.	6 years after due date which they relate to.
Works Council minutes.	Permanently.

Information TLC Care at Home Ltd collects about you: TLC Care at Home Ltd may collect the following information from you when you visit the website:

- Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system, and platform; and
- Information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from the website (including date and time), products you viewed or searched for, page response times, website errors, length of visits to certain pages, page interaction information, methods used to browse away from the page and any phone number used to call our helpline.

Information we receive from other sources: This includes information we receive about you when you use other websites operated by us or other services we provide. This information may include your name, email address, postal address and phone number.

Cookies

The Website uses cookies to distinguish you from other users of the website. For detailed information on the cookies, we use and the purposes for which we use them, please see our Cookie Policy

Use Made of the Information

We may use the information we receive and/or collect about you to:

- Fulfil our obligations under any contract that we have entered into with you or with a client that you represent, and to provide you or the relevant client with information or services that you or the client has requested.
- Send you newsletters and marketing information if you have consented to us doing so.
- Notify you of products and services that we feel may interest you or permit third parties to do so if you have provided the appropriate consent.
- Monitor website usage and provide statistics to third parties for the purposes of improving and developing the website and the services we provide via the website.

TLC Care at Home Ltd processes personal information for certain legitimate business purposes, which include some or all the following:

- Where the processing enables TLC Care at Home Ltd to enhance, modify, personalise or otherwise improve the website, its services or communications.
- To identify and prevent fraud.
- To enhance the security of the network and information systems of TLC Care at Home Ltd
- To better understand how people interact with the websites of TLC Care at Home Ltd
- To administer the website and carry out data analysis, troubleshooting and testing; and
- To determine the effectiveness of promotional campaigns and advertising

If we obtain consent from you to do so, we may provide your personal details to third parties so that they can contact you directly with respect to services in which you may be interested.

Where we are processing personal data that we have obtained via the website on the basis of having obtained consent from you, you have the right to withdraw your consent to the processing of your personal data at any time. If you would like to withdraw your consent or prefer not to receive any of the above-mentioned information (or if you only want to receive certain information from us) please let us know by contacting us via the following webpage www.tlccareathome.com Please bear in mind that if you object, this may affect our ability to carry out the tasks above for your benefit.

If you wish to have your information removed from our database or if you do not want us to contact you for marketing purposes, please let us know by clicking the "Unsubscribe" option in any email we send to you and providing the details requested or by contacting us via the following webpage [*insert webpage link*] and we will take steps to ensure that this information is deleted as soon as reasonably practicable.

We will not share, sell or distribute any of the information you provide to us (other than as set out in this policy) without your prior consent, unless required to do so by law.

TLC Care at Home Ltd
Compass House, 58 Load Street, Bewdley DY12 2AP.
Phone: 01299 272897/01299 405605
Website Privacy Statement



THIRD PARTY SITE

Our website may contain links to third party websites, including websites via which you are able to purchase products and services. They are provided for your convenience only and we do not check, endorse, approve or agree with such third-party websites nor the products and/or services offered and sold on them. We have no responsibility for the content, product and/or services of the linked websites. Please ensure that you review all terms and conditions of website use and the Privacy Policy of any such third-party websites before use and before you submit any personal data to those websites.

How Safe is your Information?

Where we have given you (or where you have chosen) a password which enables you to access certain parts of the website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Protecting your security and privacy is important to us and we make every effort to secure your information and maintain your confidentiality in accordance with the terms of the Data Protection Legislation. The website is protected by various levels of security technology, which are designed to protect your information from any unauthorised or unlawful access, processing, accidental loss, destruction and damage.

We will do our best to protect your personal data but the transmission of information via the Internet is not completely secure. Any such transmission is therefore at your own risk.

Disclosure of your Information

We may share your personal information with any member of our group, which means our subsidiaries, our ultimate holding company, and its subsidiaries, as defined in section 1159 of the Companies Act 2006. We may share your information with selected third parties including:

- Business partners, suppliers, and subcontractors for the performance of any contract we enter into with them or you.
- Third parties who may wish to contact you in respect of services or products they offer or sell which may be of interest to you, provided we receive your consent to such disclosure; and/or advertisers and advertising networks that require the data to select and serve relevant adverts to you and analytics and search engine providers that assist us in the improvement and optimisation of the website.

Please note, we may need to disclose your personal information where we:

- Sell any or all of our business or assets or we buy another business or assets in which case we may disclose your personal data to the prospective buyer or seller.
 - Are under a legal duty to comply with any legal obligation or to enforce or apply our terms and conditions; or
 - Need to disclose it to protect our rights, property or the safety of our customers or others, including the exchange of information with other companies, organisations and/or governmental bodies for the purposes of fraud protection and credit risk reduction.
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Website Privacy Statement



Enquiries for care services

We will retain this information while we are corresponding with you regarding providing services to you or to a client you represent.

We will only collect data for specified explicit and legitimate use in relation to the care enquiry. By filling in forms on this website, you consent to us holding the information contained within the forms submitted to TLC Care at Home.

If you wish to continue with your application for our care services:

We have privacy policies that you can request for further information. Please be assured that your data will be securely stored by the Registered Manager and only used for the purpose of this care application

Your Rights in Respect of your Data

If any of the information you provide to us via the website changes, please let us know as soon as possible so that we can make the necessary changes to the information we hold for you on our database. If you wish to make any changes to your information, please contact us via the following webpage *[insert webpage link]*.

If you wish to access or rectify the information we hold about you, or request that such information be transmitted directly to another data controller, please contact us via the following webpage *[insert webpage link]*. We shall process your request to access your information within one month of receipt, or we will let you know within that timeframe if we need more information from you. We will process your request free of charge.

To request that your information is deleted or if you wish to restrict or object to the processing of your information, please contact us via the following webpage *www.tlccareathome.com*

If you have any complaints about our use of your personal data, please contact us. You also have the right to complain to the relevant supervisory authority in your jurisdiction. In the UK, the supervisory authority is the Information Commissioner's Office. Contact details for the ICO can be found at <https://ico.org.uk/>.

If you have any further queries or comments on our Privacy Policy, please contact us via the following webpage *[insert webpage link]* or you can contact us by emailing *[insert email address]*. We also welcome your views about our website and our Privacy Policy.

Note: All Policies are reviewed annually, more frequently, or as necessary.

TLC Care at Home Ltd Data Privacy Policy – External

[This Notice should be circulated to non-employees, including clients, although TLC Care at Home Ltd should consider the extent to which the provisions are applicable to clients and other contacts.]

When TLC Care at Home Ltd processes your personal data, it is required to comply with the Data Protection Act 2018 (“DPA”) and the UK GDPR (the DPA and UK GDPR are together referred to as the “Data Protection Legislation”).

Your personal data includes all the information we hold that identifies you or is about you, for example, your name, email address, postal address, date of birth, location data and in some cases opinions that we document about you; as well as special categories of data, including but not limited to, medical and health records, Care Plans and information about your religious beliefs, ethnic origin and race, sexual orientation

and political views *[Update as necessary to reflect the personal data that is being processed about the Data Subjects to whom this data privacy policy will be provided]*.

Everything we do with your personal data counts as processing it - including collecting, storing, amending, transferring and deleting it. We are, therefore, required to comply with the Data Protection Legislation to make sure that your information is properly protected and used appropriately.

This data privacy policy provides information about the personal data we process, why we process it and how we process it.

Our responsibilities

TLC Care at Home Ltd is the data controller for the personal data you provide. We have appointed Jacqueline Jackson as Privacy Officer and they will have day to day responsibility for ensuring that we comply with the Data Protection Legislation and for dealing with any requests we receive from individuals exercising their rights under the Data Protection Legislation.

What personal data do we process about you?

We process your personal data in order to provide you with the services you have requested, to fulfil the contract we have entered into with you and/or to receive services or goods from you. We may also process your personal data to respond to any queries or comments you submit to us and to correspond with you on a day-to-day basis. *[Note, this paragraph tries to cover all bases including provision and receipt of services. TLC Care at Home Ltd may feel it is more appropriate to use more than one data privacy policy for non-employees].*

We may need personal data from you to be able to provide services to you, to meet our legal obligations, to enter into a contract with you and/or to provide you with all the information you need. If we do not receive the personal data from you, we may be unable to fulfil our obligations to you.

Clients

[Personal data that we may process about you (depending on the extent of the information you have provided to us) includes:

- Identity data such as your first name, middle names, last name, marital status, title, date of birth and gender
- Contact data such as your address, email address and telephone numbers.
- Financial data including your bank account and payment card details.
- Special categories of data including information about your medical background and health and diversity/equality information such as your race and ethnicity]

We process most of your information on the grounds of consent from you, legitimate interests (such as performance of a contract we have entered into with you, protection of the vital interests of a Data Subject or, in the case of special categories of data, processing for the provision of health or social care or treatment or the management of health or social care systems or services.

Suppliers]

Personal data that we may process about you includes:

Identity data such as your first name, middle names, last name, marital status, title, date of birth and gender

- Contact data such as your billing address and delivery address (whether residential or your company address), email address and telephone numbers.
- Financial data including your bank account and payment card details (except to the extent the financial information is company rather than personal information); and
- Transaction data including details about payments made to you (where you are an individual)]

We process most of your information on the grounds of our legitimate interests (including a business relationship with you or the company for which you work) and fulfilment of our contract with you (where you are an individual). Any information we process about the company for which you work rather than you as an individual is not covered by this data privacy policy.

Candidates

Personal data that we are likely to process about you includes:

- Identity data such as your first name, middle names, last name, marital status, title, date of birth and gender
- Contact data such as your postal address, email address and telephone numbers
- Background data such as your education, career background and work experience
- Personal information such as your skills and qualities
- Any other information that you include on any CV, application or covering letter you send to us. If this information includes special categories of data we will process that information on the grounds of consent, because you have chosen to provide it to us.

We process most of your information on the grounds of our legitimate interests to determine whether or not we have a suitable vacancy for you.

If we obtain consent from you to the processing of your personal data, you can withdraw your consent at any time. This will not affect the lawfulness of any processing we carried out prior to you withdrawing your consent.

Who will receive your personal data?

Please note - although the UK is no longer part of the EU, we still comply with the following:

We only transfer your personal data to the extent we need to. Recipients of your personal data include: Data base, mana

We do not transfer your personal data outside of the EEA. *[If TLC Care at Home Ltd transfers personal data outside of the EEA, delete this sentence and include the paragraph below instead].*

How long will we keep your personal data?

We will retain your personal data for

client	Adult Social Care Records	Paper/Electronic	8 years from when care ceased if no serious incidents recorded
client	Child Social Care Records	Paper/Electronic	25th Birthday if no serious incidents recorded
client	Records of Detention, Restraint, DoLS	Paper/Electronic	3 years

client	Care Records with standard retention periods	Electronic	Where the electronic system has the capacity to destroy records in line with the retention schedule, and where a metadata stub can remain demonstrating that a record has been destroyed, then the code should be followed in the same way for electronic records as for paper records with a log being kept of the records destroyed. If the system does not have this capacity, then once the records have reached the end of their retention periods they should be inaccessible to users of the system and upon decommissioning, the system (along with audit trails) should be retained for the retention period of the last entry related to the schedule
client	Incidents (serious)	Paper/Electronic	20 years and review
client	Incidents (non-serious)	Paper/Electronic	10 years

Your information will be kept securely at all times. Following the end of the relevant retention period, your files and the personal data covered by the retention period will be permanently deleted or destroyed.

What are your rights?

You benefit from several rights in respect of the personal data we hold about you. We have summarised the rights which may be available to you below, depending on the grounds on which we process your data. More information is available from the Information Commissioner’s Office website (<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>). These rights apply for the period in which we process your data.

1. Access to your data

You have the right to ask us to confirm that we process your personal data, as well as having the right to request access to/copies of your personal data. You can also ask us to provide a range of information, although most of that information corresponds to the information set out in this data privacy policy.

We will provide the information free of charge unless your request is manifestly unfounded, excessive or repetitive, in which case we are entitled to charge a reasonable fee. We may also charge you if you request more than one copy of the same information.

We will provide the information you request as soon as possible and in any event within one month of receiving your request. If we need more information to comply with your request, we will let you

know.

2. Rectification of your data

If you believe personal data, we hold about you is inaccurate or incomplete, you can ask us to rectify that information. We will comply with your request within one month of receiving it unless we do not feel it is appropriate, in which case we will let you know why. We will also let you know if we need more time to comply with your request.

3. Right to be forgotten

In some circumstances, you have the right to ask us to delete personal data we hold about you. This right is available to you:

- Where we no longer need your personal data for the purpose for which we collected it
- Where we have collected your personal data on the grounds of consent, and you withdraw that consent.
- Where you object to the processing and we do not have any overriding legitimate interests to continue processing the data
- Where we have unlawfully processed your personal data (i.e., we have failed to comply with UK GDPR); and
- Where the personal data has to be deleted to comply with a legal obligation

There are certain scenarios in which we are entitled to refuse to comply with a request. If any of those apply, we will let you know.

4. Right to restrict processing

In some circumstances, you are entitled to ask us to suppress processing of your personal data. This means we will stop actively processing your personal data, but we do not have to delete it. This right is available to you:

- If you believe the personal data, we hold is not accurate – we will cease processing it until we can verify its accuracy.
- If you have objected to us processing the data – we will cease processing it until we have determined whether our legitimate interests override your objection.
- If the processing is unlawful; or
- If we no longer need the data but you would like us to keep it because you need it to establish, exercise or defend a legal claim.
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5. Data portability

You have the right to ask us to provide your personal data in a structured, commonly used and machine-readable format so that you are able to transmit the personal data to another data controller. This right only applies to personal data you provide to us:

- Where processing is based on your consent or for performance of a contract (i.e., the right does not apply if we process your personal data on the grounds of legitimate interests); and
- Where we carry out the processing by automated means

We will respond to your request as soon as possible and in any event within one month of the date we receive it. If we need more time, we will let you know.

6. Right to object

You are entitled to object to us processing your personal data:

- If the processing is based on legitimate interests or performance of a task in the public interest or exercise of official authority
- For direct marketing purposes (including profiling); and/or
- For the purposes of scientific or historical research and statistics

In order to object, you must have grounds for doing so based on your particular situation. We will stop processing your data unless we can demonstrate that there are compelling, legitimate grounds which override your interests, rights and freedoms or the processing is for the establishment, exercise or defence of legal claims.

Automated decision making

We do not carry out any automated decision making using your personal data

You have the right to complain about our processing.

If you think we have processed your personal data unlawfully or that we have not complied with UK GDPR, you can report your concerns to the supervisory authority in your jurisdiction. The supervisory authority in the UK is the Information Commissioner's Office ("ICO"). You can call the ICO on 0303 123 1113 or get in touch via other means, as set out on the ICO website: <https://ico.org.uk/concerns/>.

Any questions?

If you have any questions or would like more information about the ways in which we process your data, please contact us.

Jacqui Jackson jacqui@tlc-careathome.co.uk
