

PRIVACY NOTICE FOR DIGITAL PLATFORM VISITORS

In accordance with the General Data Protection Regulation (GDPR), we have implemented this privacy notice to inform you of the types of data we process about you. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

This notice applies to visitors of our digital platforms; website, social media etc.

A) DATA PROTECTION PRINCIPLES

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a) processing is fair, lawful and transparent
- b) data is collected for specific, explicit, and legitimate purposes
- c) data collected is adequate, relevant and limited to what is necessary for the purposes of processing
- d) data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- e) data is not kept for longer than is necessary for its given purpose
- f) data is processed in a manner that ensures appropriate security of personal data, including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- g) we comply with the relevant GDPR procedures for international transferring of personal data

B) TYPES OF DATA HELD

We keep several categories of personal data in order to carry out effective and efficient processes. We collect this data through our digital platforms and hold it in our computer systems.

Specifically, we hold the following types of data:

- a) personal details such as name, address, phone numbers
- b) IP address

C) LAWFUL BASIS FOR PROCESSING

Page **1** of **4** Care, Trust, Respect and Progress www.progresscaresolutions.com The law on data protection allows us to process your data for certain reasons only. The information below categorises the types of data processing we undertake and the lawful basis we rely on.

Activity requiring your data	Lawful basis
Understanding your areas of interest	Our legitimate interests
Sending requested information	Our legitimate interests
Following up on your enquiry	Our legitimate interests

D) FAILURE TO PROVIDE DATA

Your failure to provide us with data prevents us from understanding your areas of interest and responding to your enquiry.

E) WHO WE SHARE YOUR DATA WITH

Employees within our company who have responsibility for marketing and processing enquiries will have access to your data which is relevant to their function. All employees with such responsibility have been trained in ensuring data is processed in line with GDPR.

Data is shared with third parties for the following reasons:

- a) Supporting digital marketing
- b) Supporting website efficiency

We may also share your data with third parties as part of a company sale or restructure, or for other reasons to comply with a legal obligation upon us. We have a data processing agreement in place with such third parties to ensure data is not compromised. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

PROTECTING YOUR DATA

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.

F) RETENTION PERIODS

We only keep your data for as long as we need it for, which will be for the duration of your enquiry. Some data retention periods are set by the law. Retention periods can vary depending on why we need your data.

G) AUTOMATED DECISION MAKING

Automated decision making means making decision about you using no human involvement e.g. using computerised filtering equipment. No decision will be made about you solely on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

H) 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.

I) MAKING A COMPLAINT

If you think your data rights have been breached, you are able to raise a complaint with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner's Office,

Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745.

J) DATA PROTECTION COMPLIANCE

Our appointed compliance officer in respect of our data protection activities is:

Vanessa Griffin

VGriffin@progresscare.co.uk

K) SUBJECT ACCESS REQUEST

To make a Subject Access Request (SAR) you should contact Vanessa Griffin on VGriffin@progresscare.co.uk and complete a Subject Access Request Form

Version	Date	Changes	By whom	Review
	Last review April 2018		Emma Ruffinato	