

1. INTRODUCTION

1.1 Meallmore Ltd is committed to protecting the privacy and security of your information.

This privacy notice explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we will store and handle that data, and keep it safe.

It is likely that we will need to update the privacy notice from time to time. We will publicise any significant changes but you are welcome to ask us questions about the notice or check the online version at any time.

1.2 We will comply with data protection law. This 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.

2. RESIDENTS AND RELATIVES: PERSONAL DATA THAT WE PROCESS

2.1 The type of information we collect from you depends on our relationship with you – for example, whether you are a resident in a Meallmore Ltd Care home, a relative of a resident, or have simply made enquiries about our products and services.

2.2 The types of information we collect in relation to residents in care homes, includes:

1. Name and date of birth;
2. Contact details (including address, phone number(s), email);
3. Health information (which will include care needs, records of care assessments, clinical records about care or treatment, medical history, test results);
4. Anyone you have chosen, or who has been appointed to act on your behalf, including friends or relatives, next of kin, persons appointed as power of attorney or guardian, or any other legal status;
5. Billing details;
6. Records of our interactions with you, for example emails, letters, notes and in some cases voice recordings of telephone conversations you have had with our employees;
7. Pension or DVLA details;
8. Personal preferences (for example, in relation to activities or events); and
9. Feedback on services.

2.3 If you are a relative or representative of a resident in a Meallmore Ltd care home, we may collect:

1. Your name;
2. Your contact details (including address, telephone number(s) and email); and
3. Records of your interactions with us (including correspondence like letters and email).

3. HOW WE COLLECT YOUR INFORMATION

Meallmore Ltd collects information in a number of ways, including:

1. If you contact us by email, phone, post or online we will keep a record of that contact;
2. When you apply to become a resident in a Meallmore Ltd care home, we will have a record of your application and your resident agreement;
3. We will always endeavor to collect information from you directly, however in some cases we may collect information about you from others. For example, we may collect your information from:
 - Someone who is acting on your behalf, such as a relative, or someone has been formally appointed to act on your behalf, such a person who appointed as your power of attorney;
 - From your doctor, specialist, hospitals or other health professionals involved in your care or treatment; and
 - From government departments such as the adult and social care service.
4. If you are providing us information about another person on their behalf, you must ensure that you have their permission to do so and you should inform that person (where practicable) that we will handle their information in accordance with this policy.

4. WHAT WE MAY USE YOUR INFORMATION FOR

We use your personal information to provide, manage and administer our services to you and to operate an efficient and sustainable business. As part of doing so, we may use your personal information to:

1. Provide you with appropriate residential care and services;
2. Provide clinical services to you (for example, services by nurses, doctors or other healthcare professionals);
3. Contact you, or your relative or representative about matters relating to you, your care or the services we provide to you;
4. Schedule and book activities and services;
5. Process payments;
6. Answer your queries and resolve complaints;

7. Undertake quality assurance and service improvement;
8. Carry out internal functions like administration, finance, information technology, training and audit;
9. Undertake customer surveys, customer and market research and analysis;
10. Monitor, price and evaluate our services and products;
11. Conduct marketing and promotional activities;
12. Practice effective risk management; and
13. Comply with relevant laws and regulations.

5. DISCLOSING YOUR PERSONAL INFORMATION

Meallmore Ltd will disclose your personal information where required to provide you with our services. In some instances, we may disclose personal information to third parties, including to:

1. Anyone engaged on our behalf to provide services, such as contractors or service providers. We require all service providers that we engage to protect the privacy of your information and to comply with any relevant privacy laws;
2. Healthcare providers who are involved in your care, such as doctors, hospitals, allied health professionals and specialists;
3. Government and regulatory bodies including local authorities and NHS;
4. Any persons acting on our behalf, including professional advisers;
5. Where disclosure is permitted or required by law

6. HOW WE USE YOUR PERSONAL DATA

6.1 We will only process your personal data if we have a legitimate (Legitimate Access) and lawful grounds for processing such data. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform a contract between us.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

6.2 We may also use your personal data in the following situations, for example:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest or for official purposes.

6.3 When that information is important to some named organisations for their work. These include:

1. The Care Inspectorate (for purposes relating to their role as a regulator of care homes)

2. The Scottish Social Security Council (for purposes relating to their role as the registrar for care workers)
3. The Information Commissioner (for purposes relating to their role as the regulator for Data Protection)
4. If a court or a law tells us we need to release information.
5. Health and Safety Executive
6. Nurse and Midwifery Council
7. HMRC
8. Local Government and Government agencies
9. Insurance purposes

6.4 We sometimes use third parties to provide us with services and they may need to process information to do so. This may include people or organisations who provide us with services necessary for us to conduct our business.

These include:

1. IT services
2. Legal services
3. Professional advisers and consultants
4. Independent complaints review services
5. Courier and secure shredding services
6. Survey management and processing services

6.5 We monitor and assess all the work we do to improve the quality of our work and to help us know when we need to put training in place.

7. DATA RETENTION

7.1 We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

7.2 To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

7.3 In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

7.4 Once you are no longer an employee, worker or contractor of the company we will retain or securely destroy your personal information in accordance with applicable laws and regulations.

8. HOW WE USE OUR WEBSITE

8.1 When you use our websites we collect information to help us understand how our website is being used. We also use cookies to help make our website easier to use by:

1. Enabling a service to recognise your device so you don't have to give the same information during one task, for example to remember the information you entered on the first page of a multi-page form.
2. Remembering settings so you don't have to re-enter them every time you visit a new page.
3. Measuring how many people are using the website and how they navigate the website, so that we can identify ways to make it easier to use and make sure that there is enough capacity for the website to perform well and respond quickly.

8.2 Our cookies aren't used to identify you personally. They're just here to make the site work better for you. Indeed, you can manage and/or delete these small files as you wish. We provide more information about our cookies, how they are used and how long they are stored for directly on our website in our Cookie Policy.

9. MARKETING COMMUNICATIONS

9.1 You will receive marketing communications from us if you have:

1. requested information from us or purchased goods or services from us; or
2. if you provided us with your details and ticked the box at the point of entry of your details for us to send you marketing communications; and
3. in each case, you have not opted out of receiving that marketing.

9.2 You can ask us to stop sending you marketing messages at any time by checking or unchecking relevant boxes to adjust your marketing preference or by emailing us at gdprenquiry@meallmore.co.uk at any time.

9.3 Where you opt out of receiving our marketing communications, this will not apply to personal data provided to us as a result of a service provided, service experience or other transactions.

10. COLLECTING INFORMATION VIA SURVEYS

When you respond to any surveys we will collect and analyse the responses you give us to help us improve our service. We will not process any data that is included in any response to a survey that could identify an individual. Personal information will be destroyed as soon as we become aware of it. We may use third party services such as Survey Monkey. Their privacy notice is available on their website <https://www.surveymonkey.com/mp/legal/privacy-policy> (link is external).

11. TRANSFERS OUTSIDE OF THE EEA

11.1 We may transfer your personal information outside the EEA. If we do, you can expect a similar degree of protection in respect of your personal information.

11.2 Where we transfer your personal data to countries where there is no adequacy decision by the European Commission in respect of that country, we will put in place certain measures to ensure that your personal data does receive an adequate level of protection, such as contractual clauses that have been approved by the European Commission.

12. RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

12.1 It is important that the personal data we hold about you is accurate and up to date. Please keep us informed if your personal information changes.

Under certain circumstances, by law you have the right to:

1. **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
2. **All requests will be handled** without undue delay and, in any case, within one month of receipt of the request. There are limited circumstances in which this timescale can be extended, in which case an extension of two months may apply, but we as the employer must tell the employee of the extended response period within one month of the request, providing the reasons for the extended timeframe.
3. **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
4. **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
5. **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
6. **Request the restriction** of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
7. **Request the transfer** of your personal information to another party.
8. **If you want to review**, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to

another party, please contact Data Protection Officer by emailing gdprequiry@meallmore.co.uk or in writing to:

Data Protection Officer, Meallmore, Caulfield House, Cradlehall Business Park, Inverness IV2 5GH

12.2 You will not have to pay a fee to access your personal data or to exercise any of the other rights under data protection laws. However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

12.3 We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

13. RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please email us at gdprequiry@meallmore.co.uk . Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.