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**Ebury Court Residential Home Limited**

438 Rush Green Road, Romford, Essex, RM7 0LX

Telephone: 01708 728734

GDPR

WEBSITE PRIVACY POLICY

**“Website Privacy Policy”**

A link to this needs to be added to the Terms of Use on the website.

“16. **Privacy Policy**

Any information that you provide Ebury Court Care Home is subject to our Privacy Policy and Cookies Policy which governs our collection and use of your information. You understand that through your use of the Service you consent to the collection and use (as outlined in the Privacy and Cookies Policy) of this information. As part of providing you with the Service, we may need to provide you with certain communications, such as Invoice or order status messages. These communications are considered part of the Service and your account which you may not be able to opt-out from receiving.

Ebury Court Care Home may also use marketing emails to keep in touch with users and share industry news relating to the trade. You can always decide to opt out of marketing messages from us in the future by updating your marketing preferences on your dashboard and unticking any marketing options you no longer want to receive.”

This document outlines what personal information data we will collect from the customer and how we intend to use it.

Last Updated 16 May 2018

## Privacy Policy

## **This is the Privacy Policy for** Ebury Court Care Home **issued in accordance with the General Data Protection Regulation (GDPR) – please read it carefully.**

## This Privacy Policy is to let you know how we handle your personal data. This includes what you tell us about yourself, what we learn by having you as a customer, and the choices you give us about what marketing you want us to send you. This Privacy Policy explains how we do this and tells you about your privacy rights and how the law protects you.

**Your personal data is any information relating to you from which you can be identified.**

This policy sets out:

* how we will process any personal data that we collect from you and what it will be used for,
* the information that you are entitled to receive from us when we collect your personal data and
* your rights under the General Data Protection Regulation (GDPR) in connection with the way we handle your personal data.

This Privacy Policy applies to any personal data which you may provide to us in person, over the telephone, by e-mail, on our website and/or by post. This Privacy Policy also applies to any personal data which we may collect from third parties about you and/or which we may collect when you access our website and/or in the course of our relationship.

You can choose not to give personal data. We may need to collect personal data by law, or under the terms of a contract and/or relationship that we have with you. If you choose not to give us this personal data, it may delay or prevent us from meeting our obligations. It may also mean that we cannot perform services, so we cancel a product or service you have with us.

**Wherever we refer to “processing” of personal data in this Privacy Policy this includes any combination of the following activities: collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.**

This Privacy Policy only applies to personal data collected by or on behalf of Ebury Court Care Home via the company’s website or by any other means. The company’s website may from time to time contain links to and from other websites (partner networks, advertisers and affiliates). If you follow a link to any external website or alternatively reach our website from a third-party website, please be aware that these websites will have their own privacy policies, separate from ours, and we therefore do not accept any responsibility or liability for these policies. Please check their policies before you submit any personal data to these websites.

## Our Promise to You

We promise:

* To keep your personal data safe and only process it on valid legal basis
* To keep our records up to date and delete or correct inaccurate personal data
* Not to keep your personal data after the purpose has ended
* Not to sell your personal data
* To give you ways to manage and review your marketing choices at any time

## Legal Basis for Processing your Personal Data

We need to have a proper reason under the GDPR whenever we process your personal data ourselves or share it with others. These reasons are:

* To fulfil a contract we have with you or to take steps at your request prior to entering into a contract with you, or
* When it is our legal duty, or
* When it is in our legitimate interest or the legitimate interest of a third party except where such interests are overridden by your interests or your fundamental rights or freedoms, or
* When you consent to it.

A **legitimate interest** is when we have a business or commercial reason to process your personal data, but this must not unfairly go against your rights. If we rely on our legitimate interest, we will tell you what that is.

In the section below this one is a list of all the ways that we may process your personal data, and which of the reasons we rely on to do so. This is also where we tell you what our legitimate interests are.

## Information we collect and how we collect it

We may collect personal data from you in the following ways:

* when you create a Ebury Court Care Home account on our website.
* when you contact us in person, over the telephone, by email or by post.
* during the process of purchasing from us (payment and transaction data)
* in customer surveys.
* when you use our services.

We may collect your personal data from third parties we work with including

* Credit reference agencies
* Analytics providers

Our website uses ‘cookies’ - a small file of letters and numbers that are stored on your computer by the websites you visit. We use cookies to improve your user experience by enabling the website to ‘remember’ you, either for the duration of your visit (using a ‘session cookie’) or for repeat visits (using a ‘persistent cookie’), this enables us to show content relevant to you on your next visit. We also use cookies to track usage, analyse trends and gather information on how customers use our website which allows us to improve our website. Cookies are not linked to other personally identifiable information.

The type of information we may ask you to provide about yourself and therefore collect includes, but is not limited to:

* **Contact Details:** Name, address, contact telephone number and e-mail address.

This information is required by Ebury Court Care Homebased on **legitimate interest** to be able to manage the account and process orders. Users can request their account to be closed at any time via the “Online Support - Your Account” section of your dashboard.

* **Business Type:**

This information is optional and is collected based on **legitimate interest** to improve services and offering. Users can update or delete their “Business type” Preferences using the “My Account” section of your dashboard.

**Marketing Preferences:**

This information is optional and is collected based on **legitimate interest** to send you informational, news and promotional content in accordance with your marketing preferences. Users can update or delete their “Marketing” Preferences using the “My Account” section of your dashboard.

At the point of purchase, you may also provide your payment details, this is however sent directly to WorldPay payment gateway and is never stored on any Ebury Court Care Home systems.

How we are likely to use your personal data

We may use the personal data collected/provided by you as follows:

**Contact Details** (including full name, address, contact numbers and e-mail address) may be used by:

* Senior management to communicate with our customers about their account and provide customer support.
* Our website and database developers to provide, support, and improve the services we offer.
* Royal Mail to provide, support, and improve the delivery services we offer.
* WorldPay to take secure credit card payments using WorldPay's secure online payment portal.
* GDPR Compliant Telephone Provider, to take secure credit card payments over the phone via WorldPay.
* GDPR Compliant Marketing Company, to send you informational and promotional content in accordance with your marketing preferences.

**Business Type** **(Optional)** may be used by:

* Senior Management, to help improve business development.
* Web and Database developers, to provide, support, and improve the Services we offer
* Preferences can be updated in the “My Account” section of your dashboard

**Marketing Preferences (Optional)** may be used by:

* Senior Management, to send you informational and promotional content in accordance with your marketing preferences.
* Web and Database to provide, support, and improve the Services we offer.
* Marketing company, to send you informational and promotional content in accordance with your marketing preferences.
* Preferences can be updated in the “My Account” section of your dashboard

## Data retention

## We will not keep your personal data for longer than is necessary for the purposes outlined above.

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## Processing in line with your rights

## You have the right to:

* Request access to any personal data we hold about you.
* Ask to have inaccurate data held about you amended.
* Prevent processing that is likely to cause unwarranted substantial damage or distress to you or anyone else.
* Object to any decision that significantly affects you being taken solely by a computer or other automated process.

## Data security

## We will ensure that appropriate measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.

## We have in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction. We will only transfer personal data to a third party if they agree to comply with those procedures and policies, or if they have in place their own adequate measures that are satisfactory to us.

## Transfers of Personal Data outside of the Cousins Material House LTD

## Where relevant, we may give third party providers who supply services to us, or who process personal data on our behalf, access to your personal data in order to help us to process your order or manage your account. We only transfer data outside of the Ebury Court Care Home where we have in place suitable contractual provisions to ensure that the data is being stored and processed in accordance with our instructions, used only for the purpose for which it was obtained and retained in accordance with our Data Retention Policy.

## Ebury Court Care Home will not sell, rent or trade your personal data.

## Third Party Providers (Data Processors)

* **WorldPay**

Ebury Court Care Home use WorldPay as their preferred payment gateway for website transactions. Any website credit card payments are taken directly by WorldPay. As part of the process WorldPay will securely take the Payment Card Number, Expiry Date and Security number and only return to us a Card Reference. We then send through the payment request using the Card Reference they supply, along with the Order number, the Card name and the Payment amount.

No credit card details are ever stored on any Ebury Court Care Home systems. The only personal details taken in our system is the Name on the Card, e.g. MR M Smith.

This information is required by Ebury Court Care Homebased on **legitimate interest** to be able to take payment via our Website.

* **West Communications**

Ebury Court Care Home phone system provider is called West Communications. Any credit card payments taken over the phone are security proceeded according to PCI regulation using West Communications secure gateway API. As part of the process West Communications will securely take the Payment Card Number, Expiry Date and Security number and only return to us a Card Reference. We then send through the payment request using the Card Reference they supply, along with the Order number, the Card name and the Payment amount.

No credit card details are ever stored on any Ebury Court Care Home systems. The only personal details taken in our system is the Name on the Card, e.g. MR M Smith.

This information is required by Ebury Court Care Homebased on **legitimate interest** to be able to take payment over the phone.

* **Royal Mail, TNT & UK Mail**

Ebury Court Care Home use Royal Mail, TNT and UK Mail to deliver products to their customers. As part of the process Ebury Court Care Home may need to send a customer’s Full Name and address to the postal company to fulfil the delivery services provided by Cousins Material House LTD.

This information is required by Ebury Court Care Homebased on **legitimate interest** to be able to fulfil the delivery services.

* **Marketing Company**

Ebury Court Care Home use a GDPR compliant Marketing Company to send out any marketing material based on your Marketing Preferences. As part of the process Ebury Court Care Home may need to send a customer Full Name and email to the Marketing Company.

* This information is required by Ebury Court Care Homebased on **legitimate interest** to be able to fulfil the delivery services

## Data Subject Access Requests

## You have the right to know what personal data we hold about you. All personal data held on our customers is visible to them in their dashboard. We hold no other correspondence, anywhere else. If you would like to delete your account, please contact us through our online support.

## Breaches of data protection principles

## If you consider that the data protection principles have not been followed in respect of personal data about yourself or others you should contact us through our online support system. All such concerns will be investigated with the utmost seriousness and professionalism and in accordance with our obligations under the Act.

## If you believe that we have not handled any complaints relating to your personal data appropriately, you can contact the Information Commissioner’s Office (see [www.ico.gov.uk](http://www.ico.gov.uk)) who will be able to guide you as to your options should you wish to pursue the matter further.

**This Privacy Policy for** Ebury Court Care Home was last updated May 2018 to take into account the new **General Data Protection Regulation (GDPR).**