

Visitor Privacy Notice

All personal information collected about you will be under the control of Anchor Hanover Group (**Anchor**) acting as Data Controller and will be processed in line with applicable UK data protection legislation including, but not limited to, the UK General Data Protection Regulation (EU) 2016/679 (UK **GDPR**) and the Data Protection Act 2018 (the **DPA**). Anchor is registered with the Information Commissioner's Office (**ICO**) and our registration number is Z7000835.

This document tells you about the sort of personal information we collect and how it will be used by us.

Who does the privacy notice apply to?

This privacy notice tells you what to expect when Anchor collects personal information about you. It applies to people who visit our website, email, call, social media message, write to us, or visit in person. The information we process about you will vary depending on the reasons you have contacted or visited Anchor.

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What is personal information?

Personal information is information about someone which allows that person to be identified. Examples of personal information that we may request and hold about you include:

- Your full name
- Address and contact details
- Vehicle registration
- Proof of your identity

What information do we hold for visitors?

Depending on the nature of your visit we may keep a record of:

- Your contact with us (phone, email, social media, writing or in person)
- CCTV images
- Call recordings
- Other images when you have agreed for these to be shared for social media purposes
- Health screening information captured to protect our residents and colleagues.
- Recording of calls to our Customer Centre
- Vehicle registration

For visitors to our website further information is available in the terms and conditions and Cookie Policy.

How do we collect your personal information?

- Directly from you
- CCTV images taken using our own CCTV systems.

Such information may be collected over the phone; by face-to-face contact; when receiving written correspondence; or electronic correspondence such as e-mails, faxes, online application forms, questionnaires, and text messages.

How do we use your personal information?

Our main legal basis for processing personal information is with your consent or where it is necessary for the purpose of the legitimate interests pursued by Anchor. These include to improve customer service and for the security and health and safety of Residents, Staff and Visitors to our sites. We will use the information that you provide for varied reasons and different legal bases may apply depending on the reason for which we have collected or obtained your personal information. The main reasons we process your information are to:

- Respond to your enquiry or complaint
- For organising and assisting community events
- To manage a contract we may have with you
- For security and health and safety reasons
- To meet our legal obligations

What information do we ask for, and why?

We do not collect more information than we need to fulfil our stated purposes and will not keep it longer than necessary.

Details of what information we collect, and store can be found in <u>Appendix A for Visitors</u>.

The purpose and lawful basis for processing your information

Depending on the processing activity, we rely on the following lawful basis for processing your personal information under the GDPR:

- Article 6(1)(a) which relates to processing where you have given us your explicit consent for one or more purposes
- Article 6(1)(b) which relates to processing necessary for the performance of a contract.
- Article 6(1)(d) to protect your vital interests or those of another person.
- Article 6(1)(f) for the purposes of our legitimate interest to manage a complaint or enquiry

Special category data

Where the information we process is special category data, for example your health data, the additional bases for processing that we rely on are:

 Article 9(2)(a) which relies on your explicit consent

Your rights in relation to this processing

As an individual you have certain rights regarding our processing of your personal information, including a right to lodge a complaint with the Information Commissioner's Office as the relevant supervisory authority.

More information about your individual rights is detailed in the Section <u>Your rights as a data subject</u>.

Who do we share information with?

Your personal information will be kept secure and confidential. Our employees have restricted access to personal information on a 'need to know' basis. There may be times when we share information about you with other organisations for example, in the event of an emergency at the location you are visiting. The information we share with others will be the minimum necessary to enable them to carry out their task. Examples of who we may share your information with include but are not limited to:

- Emergency Services
- Our regulators who require your personal information to assure them that the services we provide to you comply with essential standards of safety and quality.
- Those who require your personal information to protect the vital interests of an individual (in a life-or-death situation)

The information we share with others will be the minimum necessary to enable them to carry out their task. Anchor may also share information with others where we believe it is in your, or the public's interested to do so, such as to keep

residents, staff, or visitors safe, or as required by

We will not transfer your personal information outside of the United Kingdom or European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal information.

We will ensure that anyone we pass personal information to agrees to treat it securely and confidentially and to use or process it solely for the reasons it is provided.

How we secure your information

Anchor operates a robust process for assessing, managing, and protecting new and existing systems. Your information is protected by multiple layers of security.

Our employees complete mandatory IT (Information Technology) security and data protection training every year. Your information is available to our employees on a strictly need to know basis.

Anchor is based in the United Kingdom and most of our information is stored within either the United Kingdom or European Union. We will only allow organisations that provide services to us to store your information outside of the United Kingdom or European Union if your information is protected.

How long is your personal information kept for?

We will only use and store your information for as long as it is required for the purposes it was collected for. How long information will be stored for depends on what it is being used for. Sometimes we may also need to keep information for statutory or regulatory purposes or to deal with any legal claims.

We usually keep:

- Recordings of telephone calls and CCTV images for 28 days
- Details of guest room bookings for 1 year

- Signing in sheets for 1 year
- Complaints for 6 years after resolution
- Call recordings for 1 year

Your rights as a data subject

At any point while we are in possession of or processing your personal information, you, the data subject, have the following rights:

- Right of access you have the right to request a copy of the information that we hold about you.
- Right of rectification you have a right to correct information that we hold about you that is inaccurate or incomplete.
- Right to be forgotten in certain circumstances you can ask for the information we hold about you to be erased from our records.
- Right to restriction of processing where certain conditions apply you have a right to restrict the processing.
- Right of portability you have the right to have the information we hold about you transferred to another organisation.
- Right to object you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you have the right not to be subject to the legal effects of a decision based solely on automated processing or profiling.
- Right to judicial review: if Anchor refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in the clause below.

Can I find out the personal information that Anchor holds about me?

Anchor at your request can confirm what information we hold about you and how it is processed. If Anchor does hold personal information about you, you can request the following information:

• The purpose and legal basis for processing

- If the processing is based on the legitimate interests of Anchor or a third party, information about those interests
- The categories of personal information collected, stored, and processed
- The recipient(s) or categories of recipients that the information is/will be disclosed to
- If we intend to transfer the personal information to a third party or international organisation, information about how we ensure this is done securely
- How long the information will be stored
- Information about your right to withdraw consent at any time
- Whether the provision of personal information is a statutory or contractual requirement, or a requirement necessary to enter a contract, as well as whether you are obliged to provide the personal information and the possible consequences of failing to provide such information
- The source of personal information if it was not collected directly from you; and
- Any details regarding automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing

If we need to establish your identity before responding to a request to exercise your rights, we may request that you provide us with ID, for example passport, driving licence, birth certificate or utility bill (within the last three months).

You can exercise any of your information rights by contacting the Data Protection Team using the details provided in the 'How to contact us' Section. This can be a verbal request, in writing, via email or by completing one of our bespoke forms. You may also ask someone to do this on your behalf. contact us by using the details below. No charge will be made for this service.

Complaints

If you wish to make a complaint about how your personal information is being processed by

Anchor or any of our third parties, or how your complaint has been handled, please contact Anchor's Data Protection Officer using the details provided in the 'How to contact us' Section.

You also have the right to complain to the ICO about how we have processed your personal information. The ICO can be contacted at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, by telephone on **0303 123 1113** or through the website www.ico.org.uk.

How to contact us

You can contact us in the following ways to discuss any aspect of this notice or about the information we hold about you:

- Writing to the Data Protection Officer at Anchor, 2 Godwin Street, Bradford, BD1 2ST
- Email us at data.protection@anchor.org.uk
- Using the 'Contact us' section on our website
- Telephoning the Data Protection Team on 01274 026141

Please note that if you contact us by telephone, your call may be recorded for training and quality purposes.

This privacy notice may change from time to time. Please check our website on a regular basis to read our latest version at www.anchor.org.uk.

"We" "us" or "Anchor" means Anchor Hanover Group and its subsidiary and or associated organisations or members of its group.

Name: Anchor Hanover Group, Registered Office: 2 Godwin Street. Bradford. BD1 2ST

Registration: A charitable housing association registered as a society under the Co-operative and Community Benefit Societies Act 2014, No. 7843 and registered with the Regulator of Social Housing, No. LH4095.

Appendix A – Visitor Information

What information we collect	Why do we ask for this?
Your name, address, and contact details, including email address and telephone number.	To process your enquiry or complaint. To contact you when you are the next of kin and preferred contact of a resident.
Recording of calls to our Customer Centre	Training & monitoring purposes to improve our service and for the purpose of complaint resolution
Name and contact details, internet protocol (IP) address, and Uniform Resource Locators (URLs) when visiting our website	For visitors to our website, we use the contact details you provide to process your enquiry or complaint. In addition, technical information about your visit such as the full URL (Uniform Resource Locators) are captured to support website functionality
When required by regulations or to reduce the risk of certain contagions, we may also capture and hold health screening information	To protect care home residents and employees
CCTV Images	Store in accordance with CCTV policy and only access where there is a need i.e., crime prevention and investigation etc.
Images for social media	With your consent, we may capture your image when you attend organised events at our care homes or housing schemes.