

### Privacy Notice – Social Media

This document sets out what information Springhill House (Accrington) Limited t/a Springhill Care Home collects from visitors, how it uses the information, how it protects the information and your rights.

Springhill House (Accrington) Limited t/a Springhill Care Home is committed to ensuring your privacy is protected in accordance with Data Protection Standards.

Springhill House (Accrington) Limited t/a Springhill Care Home, is using the following definition for Personal Data:

Personal data	<p><i>Information relating to identifiable individuals, such as job applicants, current and former employees, agency, contract and other staff, clients, suppliers and marketing contacts.</i></p> <p><i>Personal data we gather may include: individuals' contact details, educational background, financial/credit worthiness and pay details, details of certificates and diplomas, education and skills, job title, and CV.</i></p>
Sensitive personal data	<p><i>Personal data about an individual's marital status, nationality, racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership (or non-membership), physical or mental health or condition, criminal offences, or related proceedings—any use of sensitive personal data will only ever be carried out with the express permission of the individual.</i></p>

Springhill House (Accrington) Limited t/a Springhill Care Home may change this policy from time to time by updating this page. This policy is effective from 1<sup>st</sup> May 2018 but we ask you to check this page from time to time. Any updates or changes to the use of your personal data will be advised to you, prior to that change of use.

#### What this Privacy Notices relates to

This Privacy Notice relates to our use of images on our social media platforms (Twitter, Facebook and our Web Site)

#### Who We Are?

Springhill House (Accrington) Limited, 11 Cannon Street, Accrington, Lancashire, BB5 1NJ, United Kingdom

#### Contact Us

You can contact us by

On-Line : <https://www.springhillcare.com>

Email : [info@springhillcare.com](mailto:info@springhillcare.com)

Phone : 01254 304500

Post: Springhill House (Accrington) Limited, 11 Cannon Street, Accrington, Lancashire, BB5 1NJ, United Kingdom

## **Our General Privacy Policy**

This Privacy Policy relates to the specific activity identified above, however our general Privacy Policy is available on the privacy policies page of our website.

## **Your Rights**

A copy of 'your rights' is available on the privacy policies page of our website.

## **What Personal Data are we collecting?**

In order to ensure that we are able to record your authority we will be recording the following:

- Your Full Name.
- Your Email Address.
- Images that you have authorised us to use.

## **Are we likely to need any Sensitive Personal Data?**

No.

## **Why we need this information?**

We need this information to enable us to comply with your wishes in respect of images that we may use as outlined above.

Your preferences will be used to ensure that we comply with your wishes.

## **What is the legal basis of processing?**

We will only use your images for as long as we have your consent and on the basis of receiving your consent in the first place.

The legal basis of processing your Personal Information is CONSENT, which you have the right to withdraw at any time, through withdrawing consent.

Because we are operating on the basis of consent, we will seek to explicitly re-confirm your consent every 6-months. If we do not obtain your consent at that point, we will assume that we no longer have your consent and we will undertake the processes as outlined in the "withdrawing consent" process below.

## **How do I withdraw consent or change my preferences?**

You can withdraw your consent at any time by:

1. Opting out of the newsletter using the opt-out option at the bottom of each newsletter we send out.
2. By contacting us letting us know what you would like to change.
3. By updating your preferences within the preference centre.

If you withdraw your consent, we will undertake activities to ensure that we remove any imagery that we have used on the social media platforms outlined at the top of this policy.

However, we only have control over our accounts and we are not able to remove images that have been taken and used by other parties.

### **What decisions are going to be made using my Personal Data?**

We are not making any decisions based on the information you are providing other than to comply with your preferences.

### **Is there any Automated Decision-making being applied to my Personal Data?**

There is no automated decision-making being made using your personal data.

### **Can I limit the use of my images?**

Yes, you can call us or write to us and request that we limit the use of your images and we will follow the process outlined in **Removing Your Images**.

You can tell us at the time we obtain your consent of any limitations that you wish to put on the use of your imagery. Depending on the limitation you request, we may choose to apply even greater limits on use and reserve the right to potentially not use the imagery at all if we believe that it is safer to take a “do not use” approach.

### **Will my information be shared with any third-parties?**

Because social media platforms are by their very nature, open and public platforms, any images we have your permission to use will be available to anyone with access to those platforms or places where we share this information. We will however periodically remove images that we consider no longer relevant e.g. if they were for a specific event.

### **What safeguards are in place to protect my Personal Data?**

Springhill House (Accrington) Limited operates a Security by Design and By Default methodology that means we are continually checking the security, both new and current. This enables us to adhere to the Privacy by Default and By Design principles.

We will not change the use of your Personal Data in respect of this policy or share your data with a third party (other than the social platforms outlined above), without obtaining your explicit consent.

Any third-party we share your data with will need to comply with the necessary data protection requirements of GDPR and PECR before we use them as a processor.

### **Retention Period**

We will retain your information so long as we have your consent.

In the event that you withdraw your consent, we will undertake the activities outlined in **Removing Your Images**.

## **Removing Your Images**

If you withdraw your consent or request that we limit the use of your images, we will undertake activities to ensure that we remove any imagery that we have used on the social media platforms outlined at the top of this policy.

However, we only have control over our accounts and we are not able to remove images that have been taken e.g. copied and used by other parties.

## **Security**

Springhill House (Accrington) Limited t/a Springhill Care Home operates a Privacy By Design and By Default policy. This means that before we use your data we have already considered the potential impact on you were your data to be lost, stolen, shared or compromised.

We undertake routine reviews of our processes and security policies in order to ensure that we can take all reasonable precautions in protecting your data.

Where at all possible we encrypt all information that is either stored or transmitted to third-parties. Where data is stored or transmitted to a Third Country (any country outside of the European Economic Area (EEA) we will ensure appropriate adequacy protection is in place in accordance with Data Protection Legislation.

Consequently, we may also need to sometimes undertake further security and screening questions when undertaking our routine dealings with you these are there to protect your personal data and security.

Whilst we undertake all reasonable precautions, encryption, software updates and patches, we cannot guarantee the safety of data transmitted over the internet.