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# PRIVACY POLICY

LifeCare Residences Limited and its group companies are committed to protecting the privacy and security of the personal information you provide to us.

This privacy policy explains how we collect, use and protect your data when you visit our website including any data you may provide to us when you register your interest in a development, sign up for our mailing list or provide services to us.

Please note that we have separate privacy policies for:

- \* [Residents and Prospective Residents of our Villages and Nursing Homes](#)
- \* [Employees, Workers and Contractors](#)
- \* [Prospective Employees and Contractors](#)

By browsing and using this website or providing us with any personal information you are consenting to us processing that data and agree to this policy governing your use of it.

This privacy notice is issued on behalf of LifeCare Residences and its group companies. Where this notice refers to “LifeCare Residences”, “we”, “us” or “our”, we are referring to the relevant company in the group responsible for processing your data. LifeCare Residences is the controller and responsible for this website.

## 1. IMPORTANT INFORMATION

### Changes to this privacy policy and your details

From time to time, we may change or update the terms of this privacy policy. We recommend you regularly review this page or contact us if you have any questions regarding this privacy policy.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### Third-party links

Please note our website may include links to other websites which are not owned or managed by us. LifeCare Residences is not associated with these third-party websites which may allow third parties to collect or share data about you. We cannot guarantee the privacy of any information that may be obtained by those third parties and we therefore strongly encourage you to read the privacy policies of any website you visit before supplying information through that website.

## 2. WHAT DATA DO WE COLLECT ABOUT YOU?

“Personal data”, or “personal information”, means any information about an individual that does or can be used to identify you. It does not include data where the identity has been removed (anonymous data).

There are “special categories” of more sensitive personal data which require a higher level of protection.

We have categorised below the type of personal data which we may collect, use and store:

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Contact information	Includes first name, surname, maiden name, marital status, title and date of birth, home address, telephone numbers, email addresses, details of relatives or primary advisers (where relevant).
Financial data	Includes bank account details and details of payments to and from you.
IT data	Includes internet protocol (IP) address, browser type and devices used.
Information about your preferences	Includes details of your interests, preferences, feedback, and survey responses.
Usage data	Includes information about your browsing activity, the pages you visit and how you use our website and services.
Marketing and communication data	Includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We do not collect any special categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, information about your health and genetic and biometric data). We also do not collect any information about criminal convictions and offences.

## **If you fail to provide personal data**

Where possible, we indicate the basic information that is required to enable us to respond to your enquiry, to fulfil a contract with you or that we are required to collect by law. We will make it clear where your response is voluntary, and you are free not to provide us with the information if you would prefer not to do so.

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel a service you are providing to us but we will notify you if this is the case at the time.

## **3. HOW IS YOUR PERSONAL DATA COLLECTED?**

We use different methods to collect data from you – you may correspond with us by post, phone or email, chat with us at an open day or complete online forms.

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You may provide us with personal data when you: -

- \* enquire about one of our developments via the website or by telephone or email.
- \* attend an open day or event which we attend.
- \* arrange a property viewing.
- \* subscribe to our mailing list, newsletter or other marketing communications or request a brochure.
- \* agree to provide us with services.
- \* enter a promotion or survey.
- \* provide feedback.
- \* submit a CV or recruitment enquiry via our website.

We may also collect IT Data automatically as you interact with our website. We collect this personal data by using cookies and other similar technologies. If you disable or refuse cookies, some parts of this website may become inaccessible or not function properly. Please see our Cookie Policy for further details.

We may receive personal data about you from various third parties and publicly available sources as set out below: -

- \* IT Data from analytics providers.
- \* Information to identify and contact you from publicly available sources.
- \* Contact information from telephone tracking services.
- \* Information to identify and contact you from events which we have sponsored and/or attended.
- \* Information to identify and contact you from estate agents and/or customer referrals.
- \* Health professionals.

#### 4. HOW DO WE USE YOUR PERSONAL DATA?

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- \* Where we need to perform the contract, we have entered into with you.
- \* Where we need to comply with a legal or regulatory obligation.
- \* 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.

We may also use your personal information in the following situations, which are likely to be rare:

- \* Where we need to protect your interests (or someone else's interests).
- \* Where it is needed in the public interest.

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You have the right to withdraw consent to marketing at any time by contacting us or unsubscribing to any marketing information sent to you.

### Purposes for which we will use your personal data

We have set out below, a description of all the ways that we might use your personal data, and which of the legal bases we rely on to do so.

Purpose	Type of data	Lawful basis for processing
To add you to our database and/or mailing list	Contact information	(a) Consent (b) Necessary for legitimate Interest (to ensure that interested parties are kept up to date with relevant information about our products and services)
To manage our relationship with you which will include: (a) Notifying you about important changes or developments (b) Asking you to provide feedback and respond to surveys etc. (c) Inviting you to events / send you newsletters	Contact information Information about your preferences Marketing and Communication data	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/ services) (c) Consent
To respond to specific requests for information about services and other enquiries and to progress your interest in our services	Contact information Marketing and Communication data	(a) Performance of a contract with you (b) Necessary for our legitimate interests (c) Consent (where appropriate)
To administer our contract with you (in the case of suppliers)	Contact information Financial details	Performance of our contract with you
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance and reporting)	Contact Information IT data	(a) Necessary for our legitimate interests (provision of administration and IT services, to prevent fraud and protect network security) (b) Necessary to comply with a legal obligation

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To deliver relevant website content and advertisements to you	Contact information IT data Information about your preferences Usage data Marketing and Communication data	(a) Necessary for our legitimate interests (to understand how customers and potential customers use our products/services and so that we can improve, support and develop those services) (b) Consent
To improve our website, products/services, marketing, customer relationships and experiences using data analytics	IT data Usage data	Necessary for our legitimate interests (to improve user experience, to identify potential new customers, to keep our website updated and for training and quality purposes)
To make suggestions and recommendations about other goods or services that may be of interest to you	Contact information IT data Information about your preferences Usage data	(a) Consent (b) Necessary for our legitimate interests (to develop our products/services and grow our business)

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

### Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. If you wish to update the nature of your consent or your communication preferences, please contact us.

You will receive marketing communications from us if you have provided us with your specific and informed consent to receiving such marketing and, in each case, you have not opted out of receiving that marketing.

### Opting out

You can ask us or third parties to stop sending you marketing messages at any time by emailing [info@lifecareresidences.com](mailto:info@lifecareresidences.com) or by clicking on the link to unsubscribe in any email alerts sent to you.

### Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

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If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### 5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your data with third parties, including third-party service providers and other entities in our group for the purposes set out above.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU.

If we do, you can expect a similar degree of protection in respect of your personal information.

#### **Why might you share my personal information with third parties?**

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

#### **Which third-party service providers process my personal information?**

“Third parties” includes third-party service providers (including contractors and designated agents) and other entities within our group.

The following third-party service providers may process personal information about you for the following purposes:

- \* Marketing agencies/consultants – for the purposes of marketing campaigns and/or market research.
- \* Financial/payroll providers – to deal with billing/payment of invoices etc.
- \* Providers of data analytics services – to help us with compiling statistical or demographic data.
- \* IT service providers – for trouble shooting, system maintenance and IT issues.
- \* Professional advisers (e.g. auditors, tax advisers, lawyers) – as required to enable them to provide professional services to us to allow us to comply with our legal and regulatory requirements.
- \* Telephone tracking services to track telephone calls from specific ads across a variety of media channels.

#### **How secure is my information with third-party service providers and other entities in our group?**

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information. We do not allow our third-party service providers to use your personal data for their own purposes. We only

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permit them to process your personal data for specified purposes and in accordance with our instructions.

### **When might you share my personal information with other entities in the group?**

We will share your personal information with other entities in our group as part of our regular reporting activities on company performance, in order to identify, confirm and/or reconcile lists of prospective customers, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data.

### **What about other third parties?**

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

## 6. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 7. DATA RETENTION

### **How long will you use my personal data for?**

We will only retain your personal data 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.

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.

By law we have to keep basic information about our customers (including Contact details and Financial data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

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### 8. WHAT RIGHTS DO I HAVE ABOUT THE USE OF MY PERSONAL DATA?

If you are a resident of the EEA, you have certain rights regarding our use of your personal data. Some of these rights, e.g. the right to be forgotten or the right to request that we transfer your information to a third party will only apply in certain circumstances.

We have listed below the rights you have over your personal data and how you can use them. Please note that these are subject to restrictions under European data protection law and, subject to the exemptions in that law, may only apply to certain types of information or processing: -

- \* We need your consent for some of the ways we use your personal information. You can remove that consent at any time.
- \* You can ask us to confirm if we are processing your Personal Information and if we are, you can ask for access to that information and details including why we are using your information, who we have shared it with, any transfers of your information to countries outside the EEA and safeguards in place and your right to a copy of that information.
- \* You can ask us to correct your information if it's wrong.
- \* You can ask us to delete some of your information.
- \* You can ask us to restrict how we use your information.
- \* You can ask us to help you move some of your information to other companies.
- \* You have a right to ask that we provide your information in an easily readable format to another company.
- \* You can ask us to stop using your information, but only in certain cases.
- \* You have the right to complain to the relevant supervisory authority.

You also have a right to object to us processing your information in certain circumstances. You can ask us to stop processing your information at any time. In certain circumstances we may not be able to do this or may not be required to do this. For example, if there are outstanding contracts between us, if we required by law to keep the information or if the information is relevant to a legal dispute then we may not stop processing your information.

#### **No fee usually required.**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

#### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.



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### Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### 9. WHAT IF I HAVE QUESTIONS REGARDING THIS POLICY?

If you have any queries about this policy, please get in touch using the contact details set out below:

Email address: [info@lifecareresidences.com](mailto:info@lifecareresidences.com)

Postal address: 15 Savile Row, London, W1S 3PJ

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.