

INTRODUCTION

Aurem Care Shared Services Limited ("Aurem Care" or "we") provide quality private residential and assisted living services including access to nursing, respite and dementia care.

This Privacy Notice describes how Aurem Care, as a data controller, collects, uses and manages the Personal Data it holds about you, including how the Personal Data may be shared and how the confidentiality of Personal Data is maintained.

We share and process your Personal Data with certain third parties, including its affiliates, as described in the "Data Sharing and Transfers" section below. The affiliates process your Personal Data and are controllers in common with Saludem. Full details of the affiliates can be found in the glossary at section 1.13. The information marked * below also applies in relation to processing of your Personal Data by the affiliates.

The "At a Glance" section contains some very important information that will help explain what Personal Data we process and why. Capitalised terms used in this Privacy Notice are defined in the Annex of Personal Data Types (section 1.11) and the glossary (section 1.13).

AT A GLANCE

1.1 When do we collect Personal Data about you? *

When we refer to Personal Data in this notice, we mean information that can or has the potential to identify you as an individual.

We will collect and process Personal Data about you at the following stages:

Stage	Description
Enquiry	<i>When you enquire about a potential vacancy by visiting one of our websites, speaking to us over the telephone or visiting us at one of our residential homes</i>
Application	<i>When you submit an application for consideration and an assessment of your suitability is undertaken. This may involve collecting your Personal Data from you directly or from third parties including employment/recruitment agencies, referees, former employers and background checking authorities.</i>
Contract and ongoing employment relationship	<i>When you have successfully passed the vetting and on boarding process and have signed a contract of employment and during the course of your ongoing employment</i>

1.2 **What Personal Data may we collect from you and why?**

Enquiry

We will largely rely on our '[Legitimate Interests](#)' to process your Personal Data with the exception of those areas marked with an (*) below where we will require your '[Consent](#)'.

Data Category	Reason for Processing
Personal Identifiers Contact Details Personal Information	To communicate with you regarding your initial enquiry
*Personal Identifiers *Contact Details Personal Information	To retain your personal information and to contact you regarding future career opportunities
Personal Identifiers Contact Details	Internal record keeping and administration

Application

We will largely rely on our '[Legitimate Interests](#)' to process your Personal Data with the exception of those items marked with an (#) below where we will rely on '[Compliance with a Legal Obligation](#)' and items marked with a (*) below where we will require your '[Consent](#)'. Where we process Special Category Data (marked with a (+) below) we do so to comply with obligations under employment law.

Data Category	Reason for Processing
Personal Identifiers Contact Details	To communicate with you regarding your application for employment
Personal Identifiers Contact Details Personal Information	To assess your suitability (skills, strengths, behaviours for the role)
*Personal Identifiers *Contact Details *Third Party Information	To verify the information that you have provided, in particular relating to your previous work history, education and professional qualifications
#Personal Identifiers #Contact Details Personal Information +Special Category Data	To undertake activities needed to complete the on-boarding and screening process should your application be successful

Contract and ongoing employment relationship

We will largely rely on '[Contractual Necessity](#)' to process your Personal Data with the exception of those areas marked with an (#) below where we will rely on '[Compliance with a Legal Obligation](#)'

Where we process Special Category Data (marked with a (+) below) we do so to comply with obligations under employment law, to assess working capacity on health grounds or for reasons of substantial public interest.

Data Category	Reason for Processing
Personal Identifiers Contact Details	<i>General management of personnel and work activities inc. appraisals, performance management, managing disciplinary matters, grievances and terminations, planning and monitoring of training requirements and career development activities and creating and maintaining one or more internal employee directories etc</i>
Personal Identifiers Contact Details Personal Information Financial Information Employment Information Special Category Data Third Party Information	<i>To carry out our obligations and benefits to you arising from any contract inc. payroll processing, healthcare, pensions, business expenses and reimbursements etc</i>
Personal Identifiers Contact Details Personal Information Financial Information +Special Category Data Third Party Information Other Information	<i>For internal audit and accounting purposes together with the preparation and review of management information</i>
#Personal Identifiers #Contact Details +Special Category Data	<i>To comply with legal and other requirements, such as income tax and national insurance deductions, record-keeping and reporting obligations, physical access policies, conducting audits, management and resolution of health and safety matters, such as accident and insurance claims, compliance with government inspections and other requests from government or other public authorities, responding to legal process such as subpoenas, responding to and controlling infection outbreaks, pursuing legal rights and remedies, defending litigation and managing any internal complaints or claims, conducting investigations and complying with internal policies and procedures</i>

For further details of the Personal Data types contained within each category please refer to the [Annex of Personal Data Types](#) which can be found in section 1.10

Your decision to provide any Personal Data described above to us is voluntary. In addition, we will only contact third party referees if you give consent for us to do so. If you chose not to provide any of the Personal Data requested, or do not consent to us contacting third party referees regarding your application, our ability to consider you as a candidate may be limited, we may not be able to perform your contract of employment (such as paying you or providing a benefit) and we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

If you are offered a position at us, you will be required to complete an application form for the Disclosure and Barring Service, and to provide a copy of any certificate conferred by the Disclosure and Barring Service to us.

We are allowed to use your Personal Data in this way to carry out our legal rights and obligations in connection with employment and we have in place an appropriate policy and safeguards which are required by law to maintain when processing such Personal Data. If you fail to provide a satisfactory certificate issued by the Disclosure and Barring Service to us, this may lead to rejection of your application for employment or immediate termination of your employment if it has already commenced.

FURTHER DETAILED INFORMATION

1.3 Data sharing and transfers *

In the usual course of business Aurem Care may disclose your Personal Data which will include health information as recorded below (to the extent necessary) to (i) its Affiliates, and (ii) certain third-party processors Aurem Care has retained to perform services on its behalf and pursuant to its instructions. This may include sharing with:

- Operating Companies to deal with any legal and compliance matters (including compliance with any matters relating to the Care Quality Commission), for record keeping, internal audit, reviews, management information, operational, administrative and reporting purposes. Full details of our Affiliates and Operating Companies can be found in the glossary. The Operating Companies may disclose your Personal Data to their Affiliates.
- business partners, suppliers and sub-contractors for the provision of the contracted services,
- organisations providing IT systems support and hosting in relation to the IT systems on which your Personal Data is stored,
- third party debt collectors for the purposes of debt collection,
- delivery companies for the purposes of transportation,
- third party service providers who perform services on our behalf based on our instructions, for instance, for the purposes of storage of Personal Data and confidential destruction. We do not authorise these service providers to use or disclose the Personal Data except as necessary to perform services on our behalf or comply with applicable legal obligations.
- NHS test and trace to help minimize the transmission of COVID-19 and support public health and safety.

Where a third-party data processor is used, we ensure that they operate under contractual restrictions with regard to confidentiality and security, in addition to their obligations under data protection laws.

We also reserve the right to transfer your Personal Data in the event of an audit or if they or any of their Affiliates sell or transfer all or a portion of their business or assets (including in the event of a merger, acquisition, joint venture, reorganization, dissolution or liquidation).

1.4 [How we protect your Personal Data](#)

We maintain appropriate technical and organisational measures designed to protect your Personal Data against loss or accidental, unlawful or unauthorised, alteration, access, disclosure or use.

1.5 [Retention period](#)

We retain Personal Data for as long as we reasonably require it for legal and business purposes. In determining data retention periods, Aurem Care and our Operating Companies also take into consideration local laws, relevant regulations and contractual obligations.

1.6 [Your rights as a data subject](#)

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

- Right of access – you have the right to request a copy of the Personal Data that we hold about you. Aurem Care and our Operating Companies reserve the right to charge a reasonable fee based on our or their administration costs where further copies are requested.
- Right of rectification – you have the right to correct Personal Data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the Personal Data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply you have the right to request that we restrict the processing.
- Right of portability – in certain circumstances you have the right to have the Personal Data 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 and profiling

All of the above requests will be forwarded on should there be a third party involved in the processing of your Personal Data.

If you would like to exercise any of your data subject rights, please contact us using one of the methods highlighted below.

1.7 [Contact Information](#)

If you have any questions about this notice or the processing of your Personal Data by us or any of the Operating Companies, please contact the Aurem Care Data Protection Officer:

- By email at dataprotectionofficer@aurum-care.com
- By writing to us at Data Protection Officer, Aurem Care Shared Services Ltd
167-169 Great Portland Street Great Portland Street, 5th Floor, London,
England, W1W 5PF

1.8 [Complaints](#)

In the event that you wish to make a complaint about how your Personal Data is being processed by us (or third parties as described in 1.3 & 1.4 above) please contact the Data Protection Officer at the address detailed above.

If you are not satisfied with how your complaint has been handled you have the right to lodge a complaint directly with the supervisory authority at the Information Commissioner's Office (ICO) Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. Tel 0303 123 1113 or 01625 5457.

1.9 [Personal data types & items](#)

Data Type	Data Items
Personal Identifiers	National Insurance Number NHS Number Online Identifiers (IP Address) Passport Number Immigration documents Visas
Contact Information	Name Address Email Telephone Room Number Community Name
Personal Information	Date of Birth Gender Marital Status Photograph Nationality
Financial Information	Bank Details Employment Loan Details Life Assurance Details Pension Details PMI Details Tax Details
Employment Information	Absence Details Employment Details (Current) Employment Details (Historic)

	Maternity Details Performance Details Disciplinary and grievance records Qualification and Training Details Reference Details Remuneration Details
Special Category Data	Ethnic Origin Health Information inc. Covid-19 and other infectious test results Race Religion Criminal records
Third Party Information	Children's Details Dependent Details Guarantor Details NOK Details Reference Details Spouse Details

1.10 [Use of cookies](#)

You can read more about our use of cookies on our [Cookies page](#)

1.11 [Glossary](#)

Affiliate

In relation to Aurem Care or any Operating Company, any subsidiary or holding company of that entity and any subsidiary of a holding company of that entity.

Consent

In certain circumstances, we are required to obtain your consent to the processing of your Personal Data in relation to certain activities.

Article 4 of the GDPR states that (opt-in) consent is "any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of Personal Data relating to him or her." In plain language, this means that:

- you have to give us your consent freely;
- you have to know what you are consenting to;
- you should have choice over which processing activities you consent to and which you don't; and
- you need to take positive and affirmative action in giving us your consent

We will keep records of the consents that we have received from you.

You have the right to withdraw your consent to these activities. You can do so at any time, and details of how to do so can be found in section 1.8.

[Contractual Necessity](#)

Article 6 of the GDPR states that we can process your Personal Data on the basis that such processing is necessary in order to enter into or perform a contract with you.

The "Contractual Necessity" lawful basis permits the processing of personal data in two different scenarios:

- Situations in which processing is necessary for the performance of a contract to which you, the data subject, is a party. This may include, for example, processing your health details for the provision of residential care.
- Situations that take place prior to entering into a contract such as pre-contractual relations. For example, a formal review of the health confirmation collected during the care package assessment to determine the level of care required and the associated residential costs.

From the point at which contract negotiations commence and throughout your stay with us we will rely on Contractual Necessity as the lawful basis for the majority of Personal Data processing activities.

[Compliance with a Legal Obligation](#)

Article 6 of the GDPR states that we can process your Personal Data on the basis that we have a legal obligation to perform such processing. Processing is permitted if it is necessary for compliance with a legal obligation.

[Legitimate Interests](#)

Article 6 of the GDPR states that we can process your Personal Data where it is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of you which require protection of Personal Data.

[Operating Companies & Affiliates](#)

<i>Name</i>	<i>Reference Number</i>
<i>Aaron House Limited</i>	<i>ZA312193</i>
<i>New Century Care (Southampton) Limited</i>	<i>Z8580190</i>
<i>New Century Care (Finchley) Limited</i>	<i>Z6015568</i>
<i>New Century Care (Colchester) Limited</i>	<i>Z6015693</i>
<i>New Century Care (Borough Green) Limited</i>	<i>Z8244073</i>
<i>New Century Finance and Leasing Limited</i>	<i>ZB043987</i>

Aurem Care PRIVACY NOTICE

Document Control
Reference: HRL1.2.3
Issue No: 0.4
Issue Date: 16/08/2023
Page: 9 of 9

<i>New Century Care (Caterham) Limited</i>	<i>Z888554X</i>
<i>New Century Care Limited</i>	<i>ZB209046</i>
<i>Custodes AcqCo Limited</i>	<i>ZB208887</i>
<i>Hailsham House and Operations Limited</i>	<i>ZA725991</i>
<i>Kettlewell House and Operations Limited</i>	<i>ZA725990</i>
<i>Salutem SL Bidco I Limited</i>	<i>ZA726547</i>
<i>Salutem SL OpCo I Limited</i>	<i>ZB233473</i>
<i>Aurem Care Limited</i>	<i>ZA742491</i>
<i>SHL2 Limited</i>	<i>ZA726585</i>
<i>Salutem HealthCare Limited</i>	<i>ZA726575</i>
<i>Fox Covert Ltd T/A Hillcrest Care Home</i>	<i>Z1546949</i>
<i>Lostock Lodge Limited</i>	<i>Z8812080</i>