

## 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:

<b>Stage</b>	<b>Description</b>
<a href="#"><u>Home Enquiry</u></a>	<i>When you enquire about our wide range of services by visiting one of our websites, completing an enquiry form, speaking to us over the telephone or visiting one of our residential homes</i>
<a href="#"><u>Home Visit</u></a>	<i>When you or a responsible party comes to visit us for a residential tour and to discuss our services in more detail</i>
<a href="#"><u>Care Assessment</u></a>	<i>When we undertake a more detailed assessment of your medical and care home needs</i>
<a href="#"><u>Care Agreement</u></a>	<i>When contract negotiations commence and / or agreement to proceed is obtained</i>
<a href="#"><u>Resident</u></a>	<i>During your stay with us as a resident</i>

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

### Home Enquiry

During this stage we rely on our '[Legitimate Interests](#)' to process your Personal Data.

Data Category	Reason for Processing
Personal Identifiers Contact Details	To provide you or a responsible party with information about services that you request or that we feel may be of benefit to you
Personal Identifiers Contact Details	To maintain contact with you and to provide you with ongoing information about related services that we feel may be of benefit to you
Personal Identifiers Contact Details	Internal record keeping and administration
Online identifiers	For system administration and internal tracking

### Home Visit

During this stage we rely on our '[Legitimate Interests](#)' to process your Personal Data with the exception of those areas marked with an (\*) below where we process your Personal Data because it is necessary for health or social care purposes.

Data Category	Reason for Processing
Personal Identifiers Contact Details	To provide you or a responsible party with information about products and services that you request from us
Personal Identifiers Contact Details	To provide you or a responsible party with information about products and services that we feel may be of benefit to you
Personal Identifiers Contact Details	To maintain contact with you and to provide you with ongoing information about related services that we feel may be of benefit to you
Personal Information Special Category Data Third Party Information Other Information	To understand the level of care required (including any medical treatment(s) and specialist care)
Personal Identifiers Contact Details Personal Information *Special Category Data Third Party Information Other Information	Internal record keeping and administration

### Care Assessment

During this stage we will rely on our '[Legitimate Interests](#)' to process your Personal Data with the exception of those areas marked with an (\*) below where we process your Personal Data because it is necessary for health or social care purposes.

<b>Data Category</b>	<b>Reason for Processing</b>
Personal Identifiers Contact Details	To provide you or a responsible party with information about products and services that you request from us
Personal Identifiers Contact Details	To maintain contact with you and to provide you with ongoing information about related services that we feel may be of benefit to you
Personal Information *Special Category Data Third Party Information Other Information	To understand the level of care required (including any medical treatment(s) and specialist care)
Personal Information Special Category Data Third Party Information Other Information	Internal record keeping and administration

### Care Agreement

During this stage will rely on '[Contractual Necessity](#)' to process your Personal Data with the exception of those areas marked with an (\*) below where we process your Personal Data because it is necessary for health or social care purposes.

<b>Data Category</b>	<b>Reason for Processing</b>
Personal Information Special Category Data Third Party Information Other Information	To determine the required pricing structure and prepare the contracts
Personal Information *Special Category Data Third Party Information Other Information	Internal record keeping and administration

### Resident Stage

During this stage will largely rely on '[Contractual Necessity](#)' to process your Personal Data with the exception of Personal Data marked with a (#) below where we will rely on '[Compliance with a Legal Obligation](#)' and with the exception of those areas marked with an (\*) below where we process your Personal Data because it is necessary for health or social care purposes.

<b>Data Category</b>	<b>Reason for Processing</b>
Personal Identifiers Contact Details Personal Information Third Party Information Other Information	To carry out our obligations to you arising from any contract Responding to your queries and every day residential needs
Personal Identifiers Contact Details Personal Information Third Party Information Other Information	To carry out our obligations to you arising from any contract Supporting your medical treatment or care and other benefits

Personal Identifiers Contact Details Personal Information Financial Information Third Party Information Other Information	<i>To carry out your obligations to us arising from any contract          Billing, accounting and payment services</i>
#Personal Identifiers #Contact Details #Personal Information *Special Category Data #Third Party Information #Other Information	<i>Responding to requests where we have a legal or regulatory obligation to do so</i>
Personal Identifiers Contact Details Personal Information Financial Information *Special Category Data Third Party Information Other Information	<i>Assessing the quality and type of care you have received and any concerns or complaints you may raise</i>
Personal Identifiers Contact Details Personal Information Financial Information *Special Category Data Third Party Information Other Information	<i>Internal record keeping and administration</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>

For further details of the data types contained within each category please refer to the [Annex of Personal Data Types](#) which can be found in section 1.11.

Your decision to provide any Personal Data described above to us is voluntary. If you chose not to provide any of the Personal Data requested, our ability to enter into a contract and or fulfil obligations to you arising from any contract may be limited.

## **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 the 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.

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.

#### 1.4 Health information collected during provision of treatment or services

Special category data (including information relating to your health) will only be disclosed to third parties in accordance with this Privacy Notice. That includes third parties involved with your treatment or care, or in accordance with UK laws and guidelines of appropriate professional bodies.

Where applicable, it may be disclosed to any person or organisation who may be responsible for meeting your treatment and or care. It may also be provided to external service providers and regulatory bodies for the purpose of clinical audit to ensure the highest standards of care and record keeping are maintained.

**Medical professionals working with us:** We may share clinical information about you with our medical professionals as we think necessary for your treatment and care.

**External practitioners:** If we refer you externally for treatment, we may share with the person or organisation that we refer you to, the clinical and administrative information we consider necessary for that referral. It will always be clear when we do this.

**Your GP:** If the practitioners treating you believe it to be clinically advisable, we may also share Personal Data about your treatment with your GP.

**The NHS:** If you are required to attend hospital, we may share the details of your treatment with the part of the NHS, as necessary to perform further treatment and care. We may also share your Personal Data with NHS Test and Trace to help minimise the transmission of COVID-19 and support public health and safety.

**Care home regulators:** We may be requested, and in some cases required, to share certain Personal Data (including Personal Data and Special Category Data) about you and your care with regulators such as Care Inspectorate and the CQC.

From time to time, we may also make Personal Data available on the basis of necessity for treatment, the provision of healthcare and payment.

In an emergency and if you are incapacitated, we may share your Personal Data (including Special Category Data) to third parties on the basis of protecting your 'vital interest' (i.e. your life or your health).

We will use your Personal Data in order to monitor the outcome of any treatment associated with your care.

## 1.5 [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.

## 1.6 [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 affiliates also take into consideration local laws, relevant regulations and contractual obligations.

## 1.7 [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.

## 1.8 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 Salutem Data Protection Officer:

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

## 1.9 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

## 1.10 Personal Data types & items \*

Data Type	Data Items
Personal Identifiers	Residential Account Number Client ID Number National Insurance Number NHS Number Online Identifiers (IP Address)
Contact Information	Name Address Email Telephone Room Number Community Name
Personal Information	Date of Birth Dietary Information Gender Marital Status Photograph Residential Status
Financial Information	Bank Details Personal Assets Personal Liabilities Residence Account Balance
Special Category Data	Ethnic Origin Health Information Religion
Third Party Information	Enquirer Details GP Details Guarantor Details NOK Details POA Details Responsible Party Details Spouse Details
Other Information	Date of Admission Details of Incident

## 1.11 Use of cookies

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

## 1.12 Glossary

### Affiliate

In relation to Aurem Care Shared Services Ltd 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 above.

## 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>
<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>