

# marketing and pr

## individual photo, video and personal or sensitive information privacy statement

### 1 Purpose of our Privacy Statement

- 1.1 Under the Data Protection Act 2018 and General Data Protection Regulation, we are required to explain why we are asking for this information about you, how we intend to use the information you provide and whether we will share this with anyone else.

### 2 Who are we?

- 2.1 We are Sanctuary Care Limited and its wholly owned subsidiaries, part of Sanctuary Group ("Sanctuary") which is one of the UK's leading providers of housing, care and commercial services. Our address is Chamber Court, Castle Street, Worcester, Worcestershire, WR1 3ZQ.

### 3 Our Data Protection Officer

- 3.1 Our Data Protection Officer is responsible for overseeing what we do with your information and monitoring our compliance with data protection laws.
- 3.2 If you have any concerns or questions about our use of your personal data, you can contact our Data Protection Officer by writing to The Data Protection Officer, Sanctuary House, Chamber Court, Castle Street, Worcester, Worcestershire, WR1 3ZQ or emailing [data.protection@sanctuary.co.uk](mailto:data.protection@sanctuary.co.uk)

### 4 Why are we collecting your information?

- 4.1 The information that you provide to us is to use to publicise Sanctuary through the methods outlined in 5.1. Consent is completely voluntary and is not required by Sanctuary in order to provide our basic services to you.

### 5 What information are we collecting?

- 5.1 The information which we are collecting about you might include photographs, video, verbal or written information collected and used via the following methods:
- Press releases
  - Telephone
  - E-newsletters or e-bulletins
  - Printed materials e.g. newsletters, leaflets, brochures, posters, displays etc.
  - Website content
  - Videos e.g. YouTube
  - Award submissions
  - Social media content e.g. Facebook, Twitter, LinkedIn etc.
  - Staff communications channels e.g. emails, intranet, newsletters etc.
  - Stakeholder briefings
  - Advertising

- 5.2 Some of the information we collect will include personal data. We may also collect special categories of personal data (also called 'sensitive personal data'), which may include information about your health, political opinions; religious or philosophical beliefs; trade union membership; genetic/ biometric data; sex life or sexual orientation and racial or ethnic origin.

## **6 What we are going to do with your information**

- 6.1 The information you provide to us will be used for the following purposes:
- It will be stored and used by us in accordance with this privacy statement and also in accordance with your rights under General Data Protection Regulation;
  - It will be collected and used by us fairly and openly for the purpose of PR and marketing of the services we provide.
  - It may be used to improve the services you receive from us.
- 6.2 Some of the information which we collect may be special categories of personal data ('sensitive personal data'), such as information about your ethnic background or any disability you may have. By providing us with this information, you consent to our use of this information for this purpose.

## **7 What is the legal basis for using your information?**

- 7.1 In accordance with data protection laws, we need a 'legal basis' for collecting and using information about you. There are a variety of different legal basis for processing personal data which are set out in the data protection laws.
- 7.2 The lawful basis on which we rely in order to use the information collected about you for the purposes set out in this notice will be:
- That you have provided your explicit consent to our use of your information.
- 7.3 The lawful basis on which we rely in order to use the special categories of personal information, your 'sensitive data', which we collect about you will be:
- That you have provided your explicit consent to our use of your information.

## **8 Sharing your information**

### **Members of Sanctuary Group**

- 8.1 Sanctuary Group is made up of a number of related companies. Your information will only be accessed by other companies in the Group where it is necessary to do so. The obligations which are set out in this notice shall apply to the other members of the Group to the same extent that they apply to us. For more information on which companies make up Sanctuary Group, please go to [www.sanctuary.co.uk/about-us](http://www.sanctuary.co.uk/about-us)

### **Contractors and sub-contractors**

- 8.2 It may be necessary to share information about you with our contractors and sub-contractors for the purposes you have consented to. The contractors and sub-contractors shall be contractually required to ensure that they adhere to the security requirements imposed by the General Data Protection Regulation.
- 8.3 Our contractors and sub-contractors will not share your information with any other parties and will only be able to use the information when completing work on behalf of us.

### **Regulators and other legal obligations**

- 8.4 We may also be required to share your information with our regulators who are permitted

access to this information by law and with other organisations where we have a legal obligation to share the information with them.

## **Other organisations**

- 8.5 We may from time to time share your information with other organisations, such as:
- The police for the purpose of detection and prevention of crime;
  - Local authorities, including Safeguarding teams, for the purpose of providing relevant information about you;
  - The NHS and other healthcare professionals for the purpose of providing relevant information about you; and
  - Organisations with a function of auditing and/or administering public funds etc. for the purpose of detection and prevention of fraud.
  - Media organisations, care sector organisations, our regulators and other stakeholder organisations.

## **9 Transferring your information abroad**

- 9.1 We will not transfer the information you provide to us outside of the European Economic Area.

## **10 Security of your information**

- 10.1 The information that you provide will be stored securely on our systems. Our security measures and procedures reflect the seriousness with which we approach security and the value we attach to your information.
- 10.2 Only relevant members of staff will have access the information you provide to us.

## **11 Can we use your information for any other purpose?**

- 11.1 In limited circumstances we may use your information for a purpose other than those set out in this policy. If we intend to do so, we will provide you with information relating to that other purpose before using it for the new purpose.

## **12 Storing your information and deleting it**

- 12.1 We will store the personal data which you provide to us for as long as you continue to provide consent. We will review and renew consent with you on a regular basis.

## **13 Your rights**

- 13.1 In relation to the information which we hold about you, you are entitled to:
- Ask us for access to the information;
  - Ask us to rectify the information where it is inaccurate or is incomplete;
  - Ask us to erase the information and take steps to ask others who we have shared your information with to also erase it;
  - Ask us to limit what we do with your information;
  - Object to our use of your information and ask us to stop that use;
  - Instruct us to provide you with the information we hold about you in a structured and commonly used format or transmit that information directly to another organisation.

- 13.2 Our obligations to comply with the above rights are subject to certain exemptions.
- 13.3 Where we are using your information because you have provided your consent to that use, you are entitled to withdraw your consent at any time. The lawfulness of our use of your information before consent was withdrawn is not affected.
- 13.4 To exercise any of the rights referred to above, you should contact our Data Protection Officer as per 3.2.
- 13.5 You also have the right to complain to the Information Commissioner's Office (the 'ICO') if you are not satisfied with the way we use your information. You can contact the ICO by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.