

marketing enquiries: **online, face to face** and **telephone** privacy statement

1 Purpose of our Privacy Statement

1.1 The Data Protection Act 2018 and the UK GDPR, says that we have to tell you:

- Why we want information about you/the resident
- What we do with the information
- Who we share the information with.

2 Who are we?

- 2.1 We are Sanctuary Care, an organisation which is part of Sanctuary Group.
- 2.2 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

4 What information are we collecting?

- 4.1 We collect personal information including your name and contact details to send you marketing information via the following methods:
- Emails
 - E-newsletters or e-bulletins
 - Printed materials e.g. newsletters, leaflets, brochures, posters, displays etc.
 - Social media content e.g. Facebook, Twitter, LinkedIn etc.
 - Advertising
 - Telephone.

5 What we are going to do with your information

- 5.1 Data protection laws say how we can use your information.
- 5.2 It will be collected and used by us fairly and openly for the purpose of marketing the services we provide.

- 5.3 We will follow the law and may keep and use your information in the following ways:
- It will be collected and used by us fairly and openly for the purpose of marketing the services we provide
 - It may also be used to improve the marketing materials you receive from us: we use the Flashtalking platform to create and analyse tailored online advertising. Further detail is set out below under 7.1
 - We monitor activity throughout our website using a third-party provider (Mediahawk) to improve our digital marketing using a Cookie (see Cookie Policy). Further detail is set out below.
 - It may also be used as part of market research for us to improve our services and products
 - We may also use your data for profiling and automated decision-making to help us evaluate certain things about you, for example, your personal preferences and your interests, for direct marketing purposes only. Further detail is set out below.
- 5.4 You may choose to tell us about special types of personal information - sensitive information to help us improve our services. Examples of this type of personal information are:
- Health
 - Disability
 - Ethnic background.

By providing us with this information, you consent to our use of this information for this purpose.

- 5.5 Data protection laws say that we must have a "legal basis" for using your information.
- 5.6 Our legal basis for using your information for marketing purposes (your non-sensitive information and sensitive information) is that you have specifically agreed for us to use the information for this purpose.
- 5.7 You can change your mind at any time.

6 Sharing your information

- 6.1 A number of different organisations make up Sanctuary Group. We will share the information with other organisations in Sanctuary Group when needed so that we can provide the best service.
- 6.2 All of the organisations in the Group will follow this Notice. You can get more information from www.sanctuary.co.uk/about-us
- 6.3 We may need to share some information with our partners for the purposes you have agreed to. We will also share information with -
- Our regulators who are permitted access to this information
 - Other organisations where we have to by law share information with them.
 - Our suppliers where they need the information to help us deliver our services including carehome.co.uk
- 6.4 We sometimes use other organisations to carry out consumer and market research to improve our services. This may involve sharing and processing personal data on our behalf. Where we do this, those companies are required to follow the same rules and information security requirements as us, and are not permitted to reuse the data for other purposes.

7 Tailored Advertising

- 7.1 Sanctuary uses the Flashtalking platform to create and deliver tailored online advertising, for device recognition and to enable advertising campaign analysis, applying both cookie-based and cookieless technologies to identify and connect devices. Learn more about Flashtalking's use of data and your choices in their consumer privacy statement at www.flashtalking.com/consumer-privacy.

8 Live chat

- 8.1 Sanctuary uses a live chat service provided by SnapEngage to allow our Enquiry Support Team to answer your queries about our care homes and to provide you with relevant marketing materials if you would prefer to chat online with us. Learn more about SnapEngage's use of your data in their privacy policy: <https://snapengage.com/privacy-policy/>

9 Mediahawk

- 9.1 We track sources which are effective at helping visitors find out about our website and make calls to us. We use IP addresses, geo-location data, caller telephone number, and voice recordings.

10 Profiling

- 10.1 We may lead or ask other organisations to carry out some of our consumer and market analysis to improve our marketing processes. This involves sharing personal information relating to our customers with third parties who specialise in profiling and segmenting people (putting people into groups of different types of customer, based on different kinds of information collected about them, to help us to better target our products to them). These companies match the information we give them with information they get from other sources to improve the accuracy of their analysis. We use the results of this analysis to help us target marketing and offers.

11 Security of your information

- 11.1 The information that you provide will be stored securely on our systems and any hard copies of the form that you complete will be stored securely before being shredded at the appropriate time. Our security measures and procedures reflect the seriousness with which we approach security and the value we attach to your information.
- 11.2 Only relevant members of staff will access the information you provide to us, and all staff are subject to duties of confidentiality.

12 Can we use the information for any other purpose?

- 12.1 If we want to use your information for another purpose we will let you know before we start using your information in this way.

13 Storing your information and deleting it

- 13.1 We will keep using your information for marketing purposes as long as you continue to consent. We will review and renew consent with you regularly..

14 Transferring your information abroad

- 14.1 We use a third party processor, Campaign Monitor, for some of our email campaigns and we transfer your information to Campaign Monitor for the purpose of sending e-marketing and communication emails to you. Campaign Monitor is a global business that is headquartered in Australia and uses a data centre located in the United States of America, so their processing of your personal data will involve a transfer of data outside the UK.
- 14.2 Whenever we transfer your information out of the UK in this way we ensure it is protected in the same way as it would be under UK law. Please let us know if you would like to find out more about how we protect your information when it is transferred abroad.

15 Your rights

15.1 You have the following rights with any information we hold on the resident or you:

- To ask to see any information we hold about you or the resident
- To correct any mistakes or changes to the information
- To ask us to delete information about you or the resident
- To limit what we do with the information
- To tell us not to use the information
- To ask us to give some information to another person.

15.2 For information we are using on the basis of your consent, you are entitled to change your mind and withdraw your consent at any time. If you do this, our use of your information before you changed your mind will remain valid.

16 How to exercise your rights

- Speak to any member of staff: They will tell the Data Protection Officer on your behalf.
- Write to: The Data Protection Officer, Sanctuary House, Chamber Court, Castle Street, Worcester, Worcestershire, WR1 3ZQ.
- Email: data.protection@sanctuary.co.uk

17 Information Commissioner's Office

17.1 You can also complain to the Information Commissioner's Office (ICO) if you are not happy with the way we use your information: ICO, Wycliffe House, Water Lane, Wilmslow, Cheshire, K9 5AF.