

All You Need to Know

ABOUT OUR PRIVACY POLICY AT UNTOLD LIVING

Welcome to the Untold Living Privacy Policy

This information has been produced to help you understand everything you need to know about the way Untold Living collects, uses and shares personal data, what your legal rights are and how to exercise them.

We hope you'll take some time to read this document; we've tried to keep it all as simple as possible and to avoid jargon, and we'll make our best efforts to keep you informed if there are any changes to the way we process your personal data in the future.

Untold Living takes its responsibility of protecting your data very seriously and we do advise you get to know our practices – If there's anything here you don't understand or if you want to ask any questions, please feel free to contact us (details are at the end).

Who is the Data Controller?

We are Ruby Senior Living Ltd, trading as Untold Living
Registered address: 4 The Courtyard, Holmsted Farm, Staplefield Road, Haywards Heath RH17 5JF.
Registered in England & Wales Number. 08685407.

In this document Ruby Senior Living Ltd, trading as Untold Living may be referred to as "we", "us", or "our".

What kinds of personal data does Untold Living process?

Untold Living collects personal data for specific purposes; with that in mind we have created a list of the types of personal data that we may collect, either directly from yourself or from other sources, in order to achieve those purposes.

The kinds of personal data we may collect are:

If you are a:	We may process these types of personal data:
Staff member	Name, address, DOB, telephone, email address, work experience, nationality, marital status, education history, national insurance number, passport details, driver's license information which may include details of driving offenses, bank details, health information, gender, tax information, criminal background checks, next of kin details, children's names and DOB.
Job applicant	Name, address, DOB, telephone, email address, work experience, nationality, marital status, education history, national insurance number, passport details, driver's license information which may include details of driving offenses, bank details, health information, gender, tax information, criminal background checks, next of kin details, children's names and DOB. (KEPT FOR 3 MONTHS IF UNSUCCESSFUL)
Resident at one of our villages	Name, address, DOB, telephone, email address, national insurance number, bank details, health information, gender, next of kin details, medical history, previous occupation.
Customer	Name, address, telephone, email address, bank details.
Supplier	Name, business, address, bank details, email address

What are the purposes Untold Living collects personal data for?

Untold Living uses personal data firstly to fulfil any contractual obligations that exist between us and yourself; where we request personal data be provided to enter into, or meet the terms of any such contract, you will be required to provide the relevant personal data or we will not be able to deliver the goods or services you want. In such cases the lawful basis of us processing the personal data is that it is necessary for the performance of a contract.

We are required by law to process personal data for purposes relating to our legal obligations, these include:

- To provide for the organisations' financial commitments, or to relevant
- To comply with regulatory requirements and any self-regulatory schemes
- To carry out required business operations and due diligence (E.g. administration, reorganisations, security, investment or corporate/asset sales)
- To cooperate with relevant authorities for reporting criminal activity, or to detect and prevent fraud
- To investigate any insurance claims, claims of unfair dismissal, claims of any kind of harassment or of discrimination, or any other claim whereby the organisation may have to defend itself

Where we have received your consent to do so; Untold Living will use your personal data for the following purposes:

- To monitor certain activities, either through online means or otherwise, to identify trends and/or behavioural patterns, or for profiling.

You may withdraw your consent for us to process your personal data for these purposes at any time; after a withdrawal of consent request is received, we may have to contact you to verify the request.

Withdrawing your consent for us to process your personal data will not affect the lawfulness of the processing beforehand.

We will also process personal data to achieve our various legitimate business interests; these are purposes that have been defined by us where we have balanced the necessity on our part to process the data for each purpose against your own expectations, interests and legal rights.

Our legitimate interests for processing personal data are:

- To provide goods and services where it has been requested
- To inform customers of other goods and services we provide or offers that may interest them
- To improve the quality of the services offered, and to better understand customers' needs by requesting feedback, or reviews of the services provided, or sending survey forms
- To send notifications of any changes to the goods and/or services provided that may affect people
- To improve the organisations website so content is delivered more efficiently
- To enhance the security measures in place that protect data the organisation is responsible for
- To protect the organisations' assets

We may process personal data where it is necessary to protect your own, or another person's, vital interests, or where it is necessary for the performance of tasks which are carried out in the public interest.

Where we process special categories of personal data other than when we have your consent to do so, we will rely on one or more of the following lawful basis:

- It is necessary to protect your vital interests where you are physically or legally incapable of giving consent.
- It is necessary for preventive or occupational medicine, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems or pursuant to contract with a health professional

Where does Untold Living obtain personal data from?

We will collect personal data directly from you in various ways. This could include when you complete an online form, or if you provide the data directly to a member of our team or representative at one of our retirement villages.

Who will Untold Living share your personal data with?

In order to achieve the above stated purposes for which we process your personal data, we may have to share your personal data with some specific third-party organisations.

We shall make all reasonable efforts to ensure that any third-party we share your personal data with is also compliant with data protection law.

The third parties we may share your personal data with include:

- Third party organisation acting as either data processors or data controllers where it is necessary to provide goods or services that have been requested, or to achieve our business purposes.
- Third party data processors or data controllers necessary to setup various resources.
- Third party data processors acting as marketing agents.

The specific types of third-party Untold Living may share your personal data with include:

- Chantry Court Westbury Ltd. (The management company at Chantry Court Retirement Village)
- Welldeal Ltd. (The lettings agent at Chantry Court Retirement Village)
- We will take responsibility for the data protection compliance of any of these third parties.
- If we sell or reorganise our business, or if otherwise required by law or by an authorised regulator, we may transfer your personal data as a part of the general business data to the relevant parties.

We will not share your personal data with any third party for marketing purposes without your prior consent.

If you subscribe to any mailing list, you will be able to unsubscribe at any time by contacting us or by clicking on an 'unsubscribe' link in an email.

Where will Untold Living store your personal data?

We will not transfer your personal data to any country outside the European Union (EU) other than those that have been granted an adequacy decision under the General Data Protection Regulation.

We may however share your personal data with third-party organisations who then intend to transfer the data outside the EU. We shall take all reasonable measures to ensure those third parties are also compliant with data protection law.

How long will Untold Living keep your personal data for?

We will keep your personal data only for as long as required in order to achieve the purposes for which it was collected, in line with this privacy notice.

The following criteria apply that determine the period for which we will store your personal data:

- Until we are no longer required to do so in order to comply with any regulatory requirements or financial obligations that we are subject to.
- Until we are no longer required to do so by any law it is subject to.
- Until all purposes for which the data was originally gathered have become irrelevant or obsolete.

Where the lawful basis of our processing is based on protection of vital interests and insofar any relevant health and safety obligations apply, Untold Living may retain your personal data for up to 40 years.

Your Rights, Our Responsibility

There are several rights granted to you immediately upon providing us with your personal information; some of these are mentioned above. We'd like you to know that at Untold Living we take your rights as a Natural Person seriously and will always conduct ourselves in a way that is considerate of our responsibility to serve your legal rights.

The Right of Access

This grants you the right to confirm whether or not your personal data is being processed, and to be provided with relevant details of what those processing operations are and what personal data of yours is being processed.

If you would like access to the personal data we have about you, we ask that you contact us by using our details below.

The Right to Rectification

This one is fairly straight forward; if you notice that the data we have about you is inaccurate or incomplete, you may request we rectify the mistake. We will make every effort to respond to requests of this type immediately.

The Right to Objection

The right to object is a basic freedom all democracies enjoy. If you wish to object to the way we use, or have used, your personal data you may do so freely.

The Right to Portability

This is a legal right afforded to you that states we must pass on all of the details you have provided to us in a machine-readable format, either to your or to another provider of your choosing.

The Right to Complain

We will always try to maintain the highest standards and encourage the confidence our customers have in us as an organisation. In order that we can achieve this we do request that any complaints be first brought to our attention so we can properly investigate matters; if however you would like to complain about Chantry Court Retirement Village to a supervisory authority you may do so by contacting the **Information Commissioners Office on 0303 123 1113, or by visiting their website - <https://ico.org.uk/concerns>**

Untold Living contact details:

Ruby Senior Living Ltd, trading as Untold Living
4 The Courtyard, Holmsted Farm, Staplefield Road,
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Who is the Untold Living Data Protection Officer?

Ametros Group Ltd
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Untold Living's responsible person is: Russell Jewell