
PRIVACY POLICY

BACKGROUND:

The Carlton Care Group understand that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits our websites at <http://www.carltoncaregroup.co.uk>, <http://www.grangehillhouse.co.uk>, <http://www.beechcroft-residentialhome.co.uk/> and <http://www.lapalhouse.co.uk/> (“Our Sites”), and will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of one of Our Sites. If you do not accept and agree with this Privacy Policy, you must stop using Our Sites immediately.

1. Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

“Account”	means an account required to access and/or use certain areas and features of Our Sites;
“Cookie”	means a small text file placed on your computer or device by Our Sites when you visit certain parts of Our Sites and/or when you use certain features of Our Sites. Details of the Cookies used by Our Sites are set out in section 10, below;
“Cookie Law”	means the relevant parts of the UK GDPR;
“personal data”	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Sites. This definition shall, where applicable, incorporate the definitions provided in the UK General Data Protection Regulation and
“We/Us/Our”	means Carlton Care Homes, a limited company registered in England under company number 04534216, whose registered address is Grove House Coombs Wood Court, Steel Park Road, Halesowen, West Midlands, B62 8BF.

2. Information About Us

- 2.1 Our Sites are owned and operated by Carlton Care Homes, a limited company registered in England under company number 04534216, whose registered address is Grove House Coombs Wood Court, Steel Park Road, Halesowen, West Midlands, B62 8BF.
- 2.2 We are regulated by the Care Quality Commission.

3. **What Does This Policy Cover?**

This Privacy Policy applies only to your use of Our Sites. Our Sites may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

4. **Your Rights**

4.1 As a data subject, you have the following rights under the UK GDPR, which this Policy and Our use of personal data have been designed to uphold:

4.1.1 The right to be informed about Our collection and use of personal data;

4.1.2 The right of access to the personal data We hold about you (see section 12);

4.1.3 The right to rectification if any personal data We hold about you is inaccurate or incomplete (please contact Us using the details in section 14);

4.1.4 The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, as explained in section 6 but if you would like Us to delete it sooner, please contact Us using the details in section 14);

4.1.5 The right to restrict (i.e. prevent) the processing of your personal data;

4.1.6 The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);

4.1.7 The right to object to Us using your personal data for particular purposes; and

4.1.8 Rights with respect to automated decision making and profiling.

4.2 If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in section 14 and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.

4.3 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.]

5. **What Data Do We Collect?**

Depending upon your use of Our Site, We may collect some or all of the following personal data (please also see section 13 on Our use of Cookies and similar technologies):

5.1 IP address;

5.2 web browser type and version;

5.3 operating system;

5.4 a list of URLs starting with a referring site, your activity on Our Sites, and the site you exit to;

6. How Do We Use Your Data?

- 6.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the UK GDPR at all times. For more details on security see section 7, below.
- 6.2 Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests. Specifically, We may use your data for the following purpose:
 - 6.2.1 Analysing your use of Our Sites to enable Us to continually improve Our Site and your user experience;
- 6.3 With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email AND/OR telephone AND/OR text message AND/OR post with information, news and offers on Our services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the UK GDPR.
- 6.4 Third parties whose content appears on Our Sites may use third party Cookies, as detailed below in section 13. Please refer to section 13 for more information on controlling Cookies. Please note that We do not control the activities of such third parties, nor the data they collect and use and advise you to check the privacy policies of any such third parties.
- 6.5 You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.
- 6.6 We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected.

7. How and Where Do We Store Your Data?

- 7.1 We only keep your personal data for as long as We need to in order to use it as described above in section 6, and/or for as long as We have your permission to keep it.
- 7.2 Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through Our Site.

8. Do We Share Your Data?

- 8.1 Subject to section 8.2, We will not share any of your data with any third parties for any purposes.
- 8.2 In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal obligations, a court order, or a governmental authority.
- 8.3 We may compile statistics about the use of Our Sites including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify

you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.

8.4 In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal requirements, a court order, or a governmental authority.

9. What Happens If Our Business Changes Hands?

9.1 We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any personal data that you have provided will, where it is relevant to any part of Our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by Us.

10. Our Use of Cookies

10.1 Our Sites may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Sites and to provide and improve Our services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

10.2 By using Our Sites you may also receive certain third party Cookies on your computer or device. Third party Cookies are those placed by websites, services, and/or parties other than Us. Third party Cookies are used on Our Sites for analytical purposes. For more details, please refer to section 6, above, and to section 10.6 below.

10.3 All Cookies used by and on Our Sites are used in accordance with current Cookie Law.

10.4 The following first party Cookies may be placed on your computer or device:

Name of Cookie	Purpose
_GRECAPTCHA	SPAM prevention
<<insert description>>	<<insert description>>
<<insert description>>	<<insert description>>
<<insert file name>>	<<insert description>>
<<insert file name>>	<<insert description>>

10.5 Our Sites use analytics services provided by Google Analytics. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling Us to better understand how Our Sites are used. This, in

turn, enables Us to improve Our Sites and the services offered through it. You do not have to allow Us to use these Cookies, however whilst Our use of them does not pose any risk to your privacy or your safe use of Our Sites, it does enable Us to continually improve Our Site, making it a better and more useful experience for you.

10.6 The analytics service used by Our Sites use Cookies to gather the required information.

10.7 The analytics service(s) used by Our Site use(s) the following Cookies:

Name of Cookie(s)	First / Third Party	Provider	Purpose
__utma __utmb __utmc __utmz 1P_JAR CONSENT NID OGPC	First	Google Analytics	Analytical

10.8 In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third party Cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

10.9 You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Sites more quickly and efficiently including, but not limited to, login and personalisation settings.

10.10 It is recommended that you keep your internet browser and operating system up-to-date.

11. **Contacting Us**

If you have any questions about Our Sites or this Privacy Policy, please contact Us by email at admin@carltoncaregroup.co.uk, or by telephone on 0121 550 1312. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you.

12. **Changes to Our Privacy Policy**

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Sites and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Sites following the alterations. We recommend that you check this page regularly to keep up-to-date.