

## MHA Privacy Notice

### Processing of Personal Information of Relatives and Emergency Contacts

Thank you for taking the time to read our privacy notice.

Methodist Homes (MHA) is a registered charity whose mission is to 'enable people to live later life well'. We recognise the trust you place in us when you share your personal information with us. We are committed to operating with openness, honesty and transparency. This privacy notice provides information about: the personal information that MHA collects about you as a Relative or Emergency Contact; the ways in which your personal information may be used; and your rights.

This Privacy Notice will be updated from time to time. The latest version, and our other privacy notices, can be found on MHA's web site ([www.mha.org.uk/PrivacyPolicy](http://www.mha.org.uk/PrivacyPolicy)). If you have provided preferences for receiving general information about MHA, including fundraising, this will be covered by the 'Supporters Privacy Notice' available at the same link.

Please note that we may use additional privacy notices to supplement this notice. We will always bring any additional privacy notice to your attention.

#### 1. Who we are and contact details

MHA is the Data Controller for the personal data we process. MHA is a registered charity in England and Wales (No. 1083995) and Scotland (No. SC040155) and a Company limited by guarantee (No. 4043124). Our registered Office is: MHA, Epworth House, Stuart Street, Derby, DE1 2EQ.

If you have any questions about this privacy notice, or wish to exercise your rights, please contact MHA's Data Protection Officer using the contact details below.

- Email [DataProtectionOfficer@mha.org.uk](mailto:DataProtectionOfficer@mha.org.uk)
- Phone 01332 221 893
- Post Data Protection Officer, MHA, Epworth House, Stuart Street, Derby, DE1 2EQ

#### 2. Personal Information Collection

Personal information is information that can be used to identify you or is about you. Please contact us to provide an update if your personal information changes. MHA, or a company working on behalf of MHA, may request from you and process the following Personal Information (P) and Special Categories of Personal Information (S):

- Name
- Postal address
- Telephone number
- Mobile number
- Email address
- CCTV recordings
- Telephone calls and LiveChat with Trusted Care Contact Centre (P)
- Views and opinions

MHA processes Special Category data in accordance with its Appropriate Policy Document which can be found at [www.mha.org.uk/PrivacyPolicy](http://www.mha.org.uk/PrivacyPolicy).

### 3. Processing of Personal Information & Legal Basis

The Legal Basis for this processing is Legitimate Interest as an MHA resident, MHA Communities member or staff member (your friend or family member) has provided your details as a point of contact, including for use in an emergency.

As an emergency contact we may place your contact details in an emergency “grab and go” bag for use if the service needs to be evacuated. If you do not want your contact used for this purpose please inform the MHA home or housing scheme.

You can opt-out of being an emergency contact by informing the MHA service or MHA’s Data Protection Officer.

Some of processing may be carried out by external organisations (Data Processors) under a contract. MHA’s Data Processors include (data stays in the UK unless otherwise stated):

- Trusted Care Contact Centre. Phone calls and LiveChat processed on behalf of MHA. Calls may be recorded and the recordings passed to MHA and LiveChat transcripts may be passed to MHA..

**Memorial Services** MHA’s homes and schemes often hold memorial services to commemorate loved ones that have passed away in the previous year. If your love one passed away at one of our homes or schemes we deem it a **legitimate interest** of MHA to invite you to the service. You can opt-out of this by informing the home or scheme. We may also ask for consent to inform you of following services.

**Promoting MHA with Photos, Videos and Quotes:** We may use photos, videos and quotes: For Publicity, fundraising and advertising materials, including printed publications

- In Presentations and exhibition materials
- On Websites, social media channels and digital communications
- In News media and their associated websites and social media channels including print, television and radio

**Personal Photos and Quotes:** MHA will ask for your **consent** to use photos, videos and quotes, in which you are a focal point, taken by staff, professionals or third party agencies on behalf of MHA. MHA may contact you as the 5 year retention period comes to an end to ask for consent to continue using the photos or video.

**Group or Event Photos:** MHA may take photos during activities or events which include multiple people, where you are not the primary focus. The legal basis for taking these photos is **legitimate interest**. During such activities or events you will be informed where the photos or filming will take place allowing you to move in or out of camera shot.

**Your Views:** MHA is continuously seeking to improve. To help us in our process we have a **legitimate interest** to seek feedback and opinions from our supporters. To this end we may occasionally ask you to: complete a survey, take part in a discussion group, or give us your views in another way. If you would rather not be invited to participate please let us know and we will record your desire to opt-out.

#### **4. Information Sharing**

MHA uses carefully selected third party service providers (Data Processors), under contract, for the purposes of completing tasks and providing services to you on our behalf (e.g. to process donations and to send mailings). They will only use your data as instructed by MHA.

MHA may share your Personal Information with another department within MHA if it is necessary to achieve the purpose for which the data was provided. This includes sharing your contact information with our chaplaincy team for the purpose of inviting you to a memorial service for your friend or family member within a year of their passing.

MHA may share your name and contact details with other care professionals if next of kin contact information is requested.

MHA will not sell or share your data with any other third parties.

#### **5. Transfers to other countries**

MHA will not transfer your information outside of the UK or the European Economic Area.

#### **6. Securing your information**

MHA takes our duty to protect your personal information and confidentiality seriously.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Access to your personal information is only allowed on a need to know basis. Those with access will only process your personal information as instructed and are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal information breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

When your personal information is shared externally it is done so securely:

- **Email:** When information is shared via email it encrypted in transit. Methods include: 1) as a password protected file, 2) using Egress or similar secure email solution, and 3) to recipients accredited by NHS Digital as secure according to their Secure Email Standard (DCB1596) to which MHA is accredited.
- **Post:** Using a sign for mail service, e.g. the Royal Mail “Sign For” service or other courier service requiring a signature on delivery.

#### **7. Retention of Personal Information**

MHA will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal requirements. At the end of the retention period your information will either be securely and confidentially destroyed or anonymized. Anonymization is the process of removing personal information from the data so that it is not possible to identify individuals from the data.

Record	Retention Time
Waiting list for vacancy in service and general enquiries	6 months when requirements can't be met 1 year for open enquiries, but extended with permission
Personal contact information	While you agree to being an emergency contact
Waiting list for vacancy in service for family member and general enquiries	6 months, but can be extended with permission
CCTV footage	30 days
Photos, videos and quotes	5 years
Your views, surveys, etc	3 years

## 8. Your Rights in relation to your Personal Information

Under the Data Protection legislation you have the following rights:

- **the right to be informed** – covered by this Privacy Notice;
- **the right of access** – you have the right to make a Subject Access Request asking for information about, or copies of, the information we hold and the way it is used;
- **the right to rectification** – as soon as you become aware that some information is incorrect let your line manager know or inform the Data Protection Officer;
- **the right to erasure** – request the deletion or removal of personal information where there is no compelling reason for its continued processing;
- **the right to restrict processing** – you can request the we stop any processing if the information we are processing is incorrect;
- **the right to data portability** – you can request the personal information provided by yourself, be exported in to a universal format so it can be imported into another system;
- **the right to object** – to processing relating to marketing and profiling;
- **the right not to be subject to automated decision-making** including profiling.

To exercise any of these rights please contact the person to whom you provided your personal data or MHA's Data Protection Officer (contact details in section 1).

If you are unhappy with the way that MHA has processed your personal data you can raise a complaint with the Information Commissioner's Office (<http://ico.org.uk>). We would appreciate it if you could please let us know if you contact the ICO. If you feel able to contact us before you contact the ICO, we will take your concerns seriously and we promise to work with you to resolve any issues that you have (noting that we will tell you if you should refer the issue to the ICO and that we may also need to tell the ICO).