

MHA Privacy Notice

For 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).

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
- Phone 01332 221 893
- Post Data Protection Officer
Methodist Homes
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. It is important that the personal information we hold about you is accurate and current. Please Contact Us to provide an update if your personal information changes. MHA may request from you and process the following Personal Information:

- Name
- Postal address
- Telephone number
- Mobile number
- Email address
- CCTV recordings
- Views and opinions

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 has provided your details 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.

NHS Test and Trace is a key part of the Government’s COVID-19 response. If we can rapidly detect people who have recently come into close contact with a COVID-19 case, we can take swift action to minimise transmission of the virus. MHA will therefore share relevant information (name, contact information, dates visited a home or scheme) with Test and Trace as and when required. The legal basis for the sharing of this information is it is a necessary task carried out in the **public interest**.

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 residents and their family members. 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.

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.

4. Information Sharing

MHA will not sell or swap your data with any third parties. We will not share your information with any third party for marketing purposes.

5. Transfers to other countries

MHA will not transfer other personal data outside of 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.

However, a requirement for the “grab and go” bag is that it is easily accessible in an emergency meaning that it could be accessed by those that do not need to know your contact details.

7. Retention of Personal Information

We 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, accounting, or reporting 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
Personal contact information	While you agree to being an emergency contact for a resident, MHA Communities or staff member
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>) which is the Supervisory Authority for the 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).