

## BACKGROUND:

Care and Companions Limited understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, [www.careandcompanions.co.uk] ("Our Site") and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

### 1. Definitions and Interpretation

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

<b>"Account"</b>	means an account required to access and/or use certain areas and features of Our Site;
<b>"Cookie"</b>	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in Part 14, below; and
<b>"Cookie Law"</b>	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003.

### 2. Information About Us

Our Site is owned and operated by Care and Companions Limited, a limited company registered in England under company number 13327733.

Registered address: 16 Crendon Street, High Wycombe, Bucks, HP13 6LW.

Representative: [Clare Brooke-Little/Mandy Twine].

Email address: [info@careandcompanions.co.uk](mailto:info@careandcompanions.co.uk)

PHONE NUMBER: 01494 578127

Postal address: 8 Commonsides, Downley, High Wycombe, HP13 5XG

### 3. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. Our Site 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. What Is Personal Data?

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified.

Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

## **5. What Are My Rights?**

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about Our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact Us to find out more or to ask any questions using the details in Part 15.
- b) The right to access the personal data we hold about you. Part 13 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by Us is inaccurate or incomplete. Please contact Us using the details in Part 15 to find out more.
- d) The right to be forgotten, i.e. the right to ask Us to delete or otherwise dispose of any of your personal data that we hold. Please contact Us using the details in Part 15 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to Us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to Us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask Us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about Our use of your personal data or exercising your rights as outlined above, please contact Us using the details provided in Part 15.

It is important that your personal data is kept accurate and up to date. If any of the personal data we hold about you changes, please keep Us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about Our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

We would welcome the opportunity to resolve your concerns ourselves, however, so please contact Us first, using the details in Part 15.

## **6. What Data Do You Collect and How?**

Depending upon your use of Our Site, we may collect and hold some or all of the personal data set out in the table below, using the methods also set out in the table.

For the purpose of providing the services to you, we may process Sensitive Personal Data of Clients and of Carers on the basis that the individual data subject has given explicit consent to the treatment of her/his Sensitive Personal Data.

Please also see [Part 14](#) for more information about Our use of Cookies and similar technologies and Our Cookie Policy.

## 7. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we may use your personal data, and Our lawful bases for doing so:

What we Do	What Data we Use	Our Lawful Basis
Providing and managing your access to Our Site.	Name, email address, and other preferences.	Contract
Administering Our Site including monitoring how our websites and Apps are used so that we are able to provide a personalised browsing experience, to help us improve the websites and Apps to make them more user-friendly and help you find products that could be of interest.	Device information, IP address, analysis of website navigation via cookies event trackers, beacons and other technologies	Legitimate Interests
Administering Our business including calls to our customer service team, which are recorded to ensure a high level of customer service to our customers, to enable staff training and to manage complaints	Recordings of calls to our Customer service teams, customer name, account ID and order ID.	Legitimate Interests
Supplying Our services to you including communicating with you about your order and managing payments for Our services.	Contact details (name, address, postcode, phone number), delivery address.  Sensitive personal data as provided by you to us in your application form.	Contract  Consent
Personalising and tailoring Our services for you.	Name, email address, training purchases and other preferences.	Consent
When you have signed up to take part in our market research programmes.	Name, email address and dependent upon the type of research, other relevant information, for example age or place of domicile may also be collected.	Consent
When we have a service	Name and email address.	Legitimate Interest

message we need to send you via email confirming your order or informing you of any changes that might affect your order, our service to you or changes to terms and conditions		
When you use our services, we will use some of your personal data to carry out anti-fraud activities: we have a legitimate interest in carrying out this activity to prevent and prosecute any fraudulent activity.	Name, billing and shipping address, email address, phone number, payment information, previous order history.	Legitimate Interest
We may use your data to establish or exercise our legal rights or to defend against any legal claims.	Identification data and other personal data that may be relevant to the specific legal claim.	Legitimate Interest
When you use our services, we are required to process your personal data to meet our legal obligations in accordance with the tax provisions and other statutory rules which apply.	Contact details and details of your financial transaction with us.	Legal Obligation
When we process your information in response to you exercising your data subject rights.	Name, contact information, purchase history, other information you have specifically requested.	Legal Obligation

## 8. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept in accordance with our Retention Policy.

## 9. How and Where Do You Store or Transfer My Personal Data?

We will only store your personal data in the UK. This means that it will be fully protected under the Data Protection Legislation.

The security of your personal data is essential to Us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so.

Now the UK is no longer part of the European Union we rely on standard contractual clauses with third party processors who are providing a service that requires personal data to be transferred from the EU into the UK, alongside any supplementary measures that are deemed necessary on a case-by-case basis.

Some of the third parties listed in section 10 'Do you share my personal data?' may be located in countries outside the European Union that offer an adequate level of data protection, as established by specific decisions of the European Commission.

The lawful transfer mechanism of your personal data to countries that do not belong to the European Union and that have not been assessed as offering adequate levels of protection will be performed only:

- after Standard Contractual Clauses have been put in place alongside any supplementary measures that are deemed necessary on a case-by-case basis;
- if the transfer is necessary for the purchase of goods offered on our website or for registration on the website or use of services on the website;
- for the management of your requests.

## **10. Do You Share My Personal Data?**

Your personal data will be processed by the internal staff of Care and Companions Limited who have been specifically trained and authorised for this processing. In carrying out the processing for distribution of our products and managing our supply chain.

Your personal data will also be transmitted to third parties that we use to provide our services; these parties have been rigorously assessed for the way in which they manage personal data and may only use your data for the exact purposes that we specify in the contract with them.

The third parties in question belong to the following categories:

- Companies such as payment service providers that help us to process your order.
- Professional service providers, such as email delivery suppliers, IT software providers, marketing and research agencies, analytics companies and website hosts who help us to run our business,
- Credit reference agencies, law enforcement and fraud prevention agencies, so we can help tackle fraud.
- Governmental bodies and regulators to comply with our legal obligations.

Aggregated data that does not identify individuals is shared with internal teams, relevant service providers and brand partners for business planning purposes.

If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, Our obligations, and the third party's obligations under the law, as described above in Part 9.

If any personal data is transferred outside of the UK, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation, as explained above in Part 9.

If we sell, transfer, or merge parts of Our business or assets, your personal data may be transferred to a third party. Any new owner of Our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

## **11. How Can I Control My Personal Data?**

11.1 In addition to your rights under the Data Protection Legislation, set out in Part 5, when you submit personal data via Our Site, you may be given options to restrict Our use of your personal data. In particular, we aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails and at the point of providing your details).

11.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

## **12. Can I Withhold Information?**

You may access certain areas of Our Site without providing any personal data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

You may restrict Our use of Cookies. For more information, see [Part 14 and Our Cookie Policy](#).

## **13. How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask Us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 15.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover Our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of Our progress.

## **14. How Do You Use Cookies?**

Our Site 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 Site 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.

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

Before Cookies are placed on your computer or device, you will be shown a bar at the bottom of the page: *“We use cookies on our website to give you the most relevant experience by remembering your preferences and repeat visits. By clicking “Accept All”, you consent to the use of ALL the cookies. However, you may visit “Cookie Settings” to provide a controlled consent.”*requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended. [You will be given the opportunity to allow only first-party Cookies and block third-party Cookies.]

Certain features of Our Site depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. These Cookies are shown in the table below. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings as detailed below, but please be aware that Our Site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

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

Name of Cookie	Purpose	Strictly Necessary
cookieinlawinfo-checkbox-analytics	This cookie is set by GDPR Cookie Consent plugin. The cookie is used to store the user consent for the cookies in the category "Analytics"	Yes
cookieinlawinfo-checkbox-functional	The cookie is set by GDPR cookie consent to record the user consent for the cookies in the category "Functional".	Yes
cookieinlawinfo-checkbox-necessary	This cookie is set by GDPR Cookie Consent plugin. The cookies is used to store the user consent for the cookies in the category "Necessary".	Yes
cookieinlawinfo-checkbox-others	This cookie is set by GDPR Cookie Consent plugin. The cookie is used to store the user consent for the cookies in the category "Other".	Yes
cookieinlawinfo-checkbox-performance	This cookie is set by GDPR Cookie Consent plugin. The cookie is used to store the user consent for the cookies in the category "Performance".	Yes
viewed_cookie_policy	The cookie is set by the GDPR Cookie Consent plugin and is used to store whether or not user has consented to the use of cookies. It does not store any personal data.	Yes

Our Site uses 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 Site is used. This, in turn, enables Us to improve Our Site and the services offered through it.

The analytics service(s) used by Our Site use(s) Cookies to gather the required information. 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 Site, it does enable Us to continually improve Our Site, making it

a better and more useful experience for you.

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

Name of Cookie	Provider	Purpose
_ga	google analytics	Used to distinguish users
_gid	google analytics	Used to distinguish users
_ga_<container-id>	google analytics	<Used to persist session state
_gac_gb_<container-id>	google analytics	Contains campaign related information. If you have linked your Google Analytics and Google Ads accounts, Google Ads website conversion tags will read this cookie unless you opt-out. <a href="#">Learn more</a> .

Our Site 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 Site and to provide and improve Our services. In addition, Our Site uses analytics services provided by google analytics which also use Cookies. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling Us to better understand how people use Our Site.

#### 15. How Do I Contact You?

To contact Us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details for the attention of Clare Brooke-Little/Mandy Twine:

Email address: [info@careandcompanions.com](mailto:info@careandcompanions.com)

Telephone number: 01494 578 127

Postal Address: 8 Commonsides, Downley, High Wycombe, HP13 5XG

#### 16. Changes to this Privacy Policy

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change Our business in a way that affects personal data protection.

Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up to date. This Privacy Policy was last updated in June 2023.