

## **Reflexion Care Group Limited Young Person's Privacy Notice ("Notice")**

Reflexion Care Group Limited ("the company", "we", "our", "us") who's registered office is Black Birches, Hadnall, Shrewsbury, Shropshire, SY4 3DH is the Data Controller for the purposes of the General Data Protection Regulation 2018, and any other data protection legislation applicable to our operations within the United Kingdom, for the Company, any Holding Company, any trading style, and/or any subsidiary.

We have developed this Notice so that our customers ("you", "your") understand how we collect, use, disclose and store personal information in respect of the Young People who are placed with us by you.

Please take time to read and familiarise yourself with this Notice. Through the act of placing a young person into any of our services, whether under a formal contract or not, you acknowledge acceptance of this Notice, and any terms implied, as to how we collect, process, disclose and store personal information about you in accordance with this Notice.

### **Data protection principles**

Under the GDPR, there are six data protection principles that the Company must comply with. These provide that the personal information we hold about the Young Person must be:

- Processed lawfully, fairly and in a transparent manner.
- Collected only for legitimate purposes that have been clearly explained to you and not further processed in a way that is incompatible with those purposes.
- Adequate, relevant and limited to what is necessary in relation to those purposes.
- Accurate and, where necessary, kept up to date.
- Kept in a form which permits your identification for no longer than is necessary for those purposes.
- Processed in a way that ensures appropriate security of the data.

The Company is responsible for, and must be able to demonstrate compliance with, these principles. This is called accountability.

### **What personal information do we collect?**

The type of personal information that we will collect will include the Young Person's name, address, date of birth, parental details, convictions, health details, and contact information in respect of you.

We will collect information about the Young Person when you contact us, from documents that you may supply to us, from information provided to us by third parties who have been previously involved with providing services for the Young Person, and from any correspondence or communications that may take place between you and us.

### **How will we use the personal information that we collect about the young people?**

We use the personal information collected in respect of the Young Person to:

- Manage and facilitate the provision of services by us to you;
- undertake risk assessments to manage the Young Person;
- Respond to any enquiry or feedback we receive from you;
- Comply with any legal requirements placed upon us;
- Contact you to discuss the young person and the services that we are about to, or have, provided
- Contact relevant third parties who have an interest or involvement in the Young Person
- Provide anonymous statistical analysis for both internal and external purposes to improve or assist in the manner in which we provide the services

The Legal Basis upon which we process the personal information will either be to meet our contractual obligations (should a formal contract exist between you and us), to meet our legal obligations or for a legitimate interest. We will only use the personal information that we collect about the Young Person where it is fair to do so.

On occasions certain types of processing of the personal information of the Young Person may require us having to obtain explicit consent from the legal guardian. In such circumstances the Legal Basis that we will rely upon for processing the Young Persons personal information will be consent.

#### **How long will we retain the Young Person's personal information for?**

We will only keep the personal information for the length of time that we are required to keep it for the purposes we have set out in this Policy and to comply with any legal requirements to retain such personal information. Certain personal information in respect of the Young Person will have to be held up to a maximum of the Young Person's 75<sup>th</sup> birthday. Except for any legal requirement, we would not normally retain the information we collect about a Young Person for no more than seven years after it was last used for the purposes set out in this Notice.

#### **Will we share the Young Person's personal information with anyone else?**

We may share personal information in respect of the Young Person with any member of our group of companies.

Upon obtaining legal guardian consent we will share the Young Person's personal information with any Government Agency, Public Body, the Health Services and/or any other third party service engaged by you to support the Young Person

We may disclose the Young Person's personal information to third parties:

- If we have appointed a third party to perform certain functions on our behalf, where those third parties need to have access to your personal information to properly perform their function:
- If we become involved in a merger, acquisition or transaction involving the sale of some or all of our group company's assets, user information (including the personal information collected from you) may be included in the assets which are transferred to the new owner; or
- If we are under a duty to disclose or share your personal information in order to comply with any legal obligation.

We will never share any Young Persons personal information with anybody outside of our group of companies for any mailing or marketing purposes.

#### **How do we store the Young Person's personal information?**

We have put in place measures to ensure the security of the Young Person's personal information that we collect and store about them, and we will use all reasonable endeavours to protect the personal information from unauthorised disclosure and/or access. Unfortunately the transmission of information via the internet, or via any postal service, is not completely secure and therefore we cannot guarantee the security of any personal information that you may transmit to us over this media or which you post to us. As a consequence, any delivery of a Young Person's personal information using either of these forms of communication is at your own risk

#### **Accessing the Young Person's personal information**

You, the Young Person, and any Legal Guardian has the right to know whether we hold personal information about the young Person, and, if we do, to request a copy of it. If you would like a copy of some or all of the personal information held in respect of a Young Person that was placed into one of our services by you that we retain, please contact us by writing to the Data Controller care of the address stated in this Notice

#### **Accuracy of the Young Person's personal information**

We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove any personal information you think is inaccurate

If you have any concerns about how we process your personal information please contact us by writing to the Data Controller care of the address stated in this Notice. If we are unable to satisfactorily deal with your concerns then you are entitled to lodge a complaint with the Information Commissioners Office.

**Changes to this Notice**

We keep this Notice under review and we will place updates on this web page.

This Notice was last updated May 2018