

## **HAMMONDCARE INTERNATIONAL LIMITED Privacy Notice**

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### **1. Introduction and who we are**

HammondCare International Limited and our group of companies ("HammondCare", "we", "our" or "us") are strongly committed to being responsible custodians of the information you provide us and the information we collect in the course of operating our business.

This Privacy Notice explains how HammondCare, as a data controller, may collect, use, share and protect information that we obtain about you directly or indirectly in accordance with applicable data privacy laws.

Where you use our services, or your personal data is processed in connection with such services, and we control the purpose for which such personal data is processed, HammondCare will be the data controller of such information.

From time to time, there may be more than one data controller of your information within our group where you have engaged different parts of our broader organisation to provide different or jointly delivered services.

This Privacy Notice does not apply to, and HammondCare is not responsible for, any third party websites which may be accessible through links from this website (please see section 11 (Online services - Links to third party sites, services and content) below for more information).

### **2. Scope of Privacy Notice**

This Privacy Notice explains and describes:

- When this Privacy Notice applies.
- How we collect your personal data.
- Legal basis for usage of your personal data.
- How we use the personal data we collect.
- How and when we may disclose personal data that we collect.
- What happens if your personal data is transferred overseas.
- How long we hold your personal data.
- How we protect your personal data and keep it secure.
- What cookies are and how we use them.
- What happens when you access third-party services and content?
- Your legal choices and rights.
- The status of this Privacy Notice and any changes that are made to it.
- How to request further information.
- Our contact details.

### **3. When this Privacy Notice applies**

This Privacy Notice applies:

- to your use of any of our services where we are performing a data controller function;

- where you receive health and aged care services from us;
- where you apply to us for a job or work placement;
- your supply of services to us where this involves any personal data; and/or
- to any personal information collected from third parties where we are the controller of such information.

This Privacy Notice additionally applies to our website and online services, including [www.hammondcare.com.au](http://www.hammondcare.com.au); [www.dementiacentre.com](http://www.dementiacentre.com); [www.dementia.com.au](http://www.dementia.com.au); [www.dementiaconference.com](http://www.dementiaconference.com); MelonMail; and any other website, mobile app or other online service created or hosted by us from time to time on which this Privacy Notice appears (together, our "**online services**") through which we may collect certain details if, for example, you want to subscribe to any publications or newsletters that we may periodically issue.

Please note that our online services make use of cookies and similar technologies, as described in more detail in section 10 (Cookies Policy) below.

#### 4. How we collect your personal data

"**Personal data**" is any information that can be used to identify you or that we can link to you.

Where you **use our services**, we will collect personal data directly from you including where you receive care from us in a personal capacity.

If you are receiving care from us in a personal capacity then we will collect personal information from you that may include:

- Any contact we have had with you and when you have visited us.
- Notes and reports about your health and any treatment you have received, either from us or from other healthcare providers.
- Relevant information from your relatives or those who care for you and know you well.
- Your NHS number and details of your next of kin.
- Any other personal information shared with us as described in this section.

In the provision of health and aged care services, we will routinely collect **sensitive personal information**, which is defined in the relevant data protection legislation as information about your health, religious beliefs, ethnicity and political opinions. This information requires more protection and we will only collect and/or use your sensitive personal information where we have a valid legal basis, as set out in section 5 below.

We may also collect personal data from third parties such as your employing organisation, regulatory authorities, recruitment agencies, credit reporting agencies, information or service providers, publicly available records, and the third parties described in section 7 (Disclosure of your information) below.

We collect information that you voluntarily provide to us, including when you communicate with us via email or other channels; when you sign up for or request that we send you newsletters, alerts, or other materials; when you sign up for a webinar or event; and when you respond to our communications or requests for information.

The information you provide may include current and historical personal data including your name, contact details, title, identification, employment, positions held and enquiry/complaint

details and information about the organisation with which you are affiliated. We may also collect personal data about your other dealings with us and our clients, including any contact we have with you in person, by telephone, email or online.

We will handle any unsolicited information in accordance with law, including destroying or de-identifying such information where we are required to do so.

When you use our **online services**, we may collect the following:

- Information you provide by completing forms (this includes information you give us, submitting material, requesting services, entering competitions, registering for any of our online offerings or subscribing to our newsletters or other services).
- Information you provide by your participation in competitions, live chats, message boards.
- Information you provide to us if you contact us, for example to report a problem with our online services or raise a query or comment.
- Details of visits made to our online services including, but not limited to, the volume of traffic received, logs (including, where available, the IP address and location of the device connecting to the online services and other technical information and identifiers about the device and the nature of the visit) and the resources accessed.
- Where our online services require that you enter a password or other information in order to access certain features, we will collect such credentials when you enter them.

**Where others pass your personal information to us** (“the Discloser”) **because you are receiving care or support from us in a personal capacity** and we are given personal information about you from an NHS healthcare team or residential care home staff or hospice staff or you are referred to us by a nurse, GP or hospital consultant. In this relationship, HammondCare is processing such personal information in a capacity as data processor and the Discloser will ensure that it has secured all necessary consents, registrations and notifications as may be required to enable the lawful transfer of the personal data to HammondCare.

**If you apply for a job or work placement with HammondCare** then you may need to provide information about your education, employment, racial background and state of health. As part of your application you will be asked to provide your express consent to our use of this information to assess your application and to allow us to carry out both recruitment analytics and any monitoring activities which may be required of us under applicable law as an employer. We may also carry out screening checks (including reference, background, directorship, financial probity, identity, eligibility to work, vocational suitability and criminal record checks) and consider you for other positions.

We may exchange your personal data with academic institutions, recruiters, screening check providers, health service providers, professional and trade associations, law enforcement agencies, recruitment analytics providers, referees and your current and previous employers. We may also gather additional information about you from publicly available resources such as LinkedIn or other social or professional media platforms and collate this with the information that you provide to us. Without your personal data, we may not be able to progress considering you for positions with us.

In some instances, personal data must be provided to us in order for us to legally or contractually perform services to you, for example where we *are obligated to gather personal*

*data for protection purposes when working with vulnerable people.* Where relevant we will highlight to you those details that we are obligated to collect.

## 5. Legal basis for usage of personal data

Where we intend to use your personal data, we rely on the following legal grounds:

**Performance of a contract:** We may need to collect and use your personal data to enter into a contract with you or to perform a contract that you have with us. For example, undertaking a research project or providing training, and where we respond to your requests and provide you with services in accordance with our terms and conditions or other applicable terms of business agreed with you or with your employing organisation.

**Legitimate interests:** Where we consider use of your information as being (a) non-detrimental to you, (b) within your reasonable expectations, and (c) necessary for our own, or a third party's legitimate purpose, we may use your personal data, which may include:

- for our own direct marketing or continued communication;
- the prevention of fraud;
- our own internal administrative purposes;
- provision and personalisation of the service(s) we provide to you;
- ensuring network and information security, including preventing unauthorised access to electronic communications networks and stopping damage to computer and electronic communication systems; and/or
- reporting possible criminal acts or threats to public security to a competent authority.

**Compliance with a legal obligation:** We may be required to process your information due to legal requirements, including employment laws, tax laws and other regulatory provisions applicable to HammondCare as a provider of research, education, health and aged care services, for example, where we need to share your personal data with regulatory bodies which govern our work and services.

**Consent:** You may be asked to provide your express consent in connection with certain services that we offer, for example in respect of any processing of your personal data for our marketing purposes where you or your employing organisation is not a client of HammondCare. We may also require your explicit consent in respect of certain special categories of personal data such as your health or racial background due to the circumstances in which such information is gathered or transferred and where we do not have another lawful basis as set out in this Privacy Notice. Where we are reliant upon your consent, you may withdraw this at any time by contacting us in accordance with section 14 (Further information) below, however please note that we will no longer be able to provide you with the products or services that rely on having your consent.

**Public Task:** In the event that we are required by law to carry out a specific task in the public interest or are compelled by the exercise of official authority, we may share or process your personal information.

### **Sensitive personal information (special category data)**

Under applicable data protection laws we are prohibited from processing sensitive personal information (special category data) unless additional conditions are met. In such circumstances, we will rely on the following legal bases:

**Explicit consent:** Explicit consent is used in respect of processing your sensitive personal information in the same way as for your non-sensitive personal information, as set out above in the section above headed Consent.

**Vital interests:** Where it is in your or someone else's vital interests, such a medical emergency suffered by an individual using our services who is physically unable to give their consent, we may be required to use your personal and sensitive personal information.

**Provision of health and social care:** We may need to process and share sensitive personal information for the purposes of providing direct care to you or for administrative purposes related to the provision and management of your care.

**Social security & protection:** We may need to process or share your sensitive personal information in order to comply with social security and social protection legislation.

## 6. How we use your personal data

Depending upon the circumstances in which we gather your personal data, we may use your information to provide you with services and information, or for any of the following purposes:

- To provide you with HammondCare's services (as noted above) that you or your employing organisation request.
- To respond to your enquiries.
- To carry out our obligations arising from any contracts entered into between you and us.
- To facilitate our internal business operations, including to fulfil our legal or regulatory requirements.
- To maintain and develop our relationship with you.
- For our business purposes, including data analysis, submitting invoices, detecting, preventing, and responding to actual or potential fraud, illegal activities, or intellectual property infringement.
- To maintain and update our records including our database of contacts.
- To tailor our services to your preferences, e.g. dietary requirements at a HammondCare event you are attending.
- To provide you on an ongoing basis with information and services, including relevant marketing communications related to HammondCare, and other information or materials, that you request from us or which we feel may interest you where you have indicated that you would like to receive these from us.
- To evaluate, recruit, and hire personnel.
- To help us to improve our services, products or online services
- To measure the popularity and effectiveness of services such as newsletters and seminar invitations, in order to improve what we offer to you and other recipients.
- To ensure that content from our online services is presented in the most effective and secure manner for you and the device on which you are accessing our services, and to troubleshoot, and improve such online services.
- To allow you to use or access interactive features or secure areas of our online services, when you choose to do so.

- For research, planning, service development, security or risk management.
- As we believe reasonably necessary or appropriate to: comply with our legal obligations; respond to legal process or requests for information issued by government authorities or other third parties; or protect your, our, or others' rights.

If you are receiving care from HammondCare in a personal capacity, we may use your personal and sensitive personal information to:

- Plan your care and provide you with a high standard of care.
- Provide health and social care professionals who are involved in your care with relevant, accurate and up-to-date details about your health and other needs.
- Investigate any concerns or complaints you may have, either about your care or the standards of any health or social care professionals looking after you.
- Check and make improvements to our services.
- In some cases, use your anonymised information (by removing anything that identifies you) for research purposes and to help us improve the quality of our services.

We may not be able to do some or all of these things without your personal data.

If at any time we intend to change the purpose for which we hold your personal data, for example to offer you with a complimentary service that we may provide in the future, we will give you prior information of that new purpose so you are aware of this.

## **7. Disclosure of your information**

We may, in providing our services and operating our business, allow access to your personal data to the different entities within HammondCare's group for our internal administrative purposes such as billing, promoting our events and services, and providing you or your organisation with services, provided in all instances that such processing is consistent with section 5 (Legal basis for usage of personal data) above and applicable law.

We may exchange your personal data with third-party service providers contracted to HammondCare where any of the following apply:

- You have consented to us sharing your personal data in this way.
- We deem it reasonably necessary to provide you with the services that you have required at any particular time.
- Such sharing is provided for under contract, including our terms and conditions for any particular service that we may provide to you.
- Such sharing is to law enforcement bodies or other government authority.
- We need to enforce or apply our terms and conditions to which you have agreed (or other terms that have been agreed to apply to our relationship with you or your employing organisation).
- It is necessary for the provision of care and/or medical research to share information with healthcare professionals, medical researchers and other relevant organisations.
- It is necessary to protect the rights and interests, property, or safety of HammondCare, our clients or others.

- It is relevant in the circumstances to disclose the information to parties with whom we have co-promotional arrangements (such as jointly sponsored events, external venues, or caterers).
- Our agents or contractors who assist us in providing our services require such information, for example in fulfilling requests for information, receiving and sending communications, updating marketing lists, analysing data, providing support services or in other tasks from time to time. Our agents and contractors will only use your information to the extent necessary to perform their functions.
- We use third party service providers to provide services that involve data processing, for example archival, web-hosting, analytics providers in connection with the operation of our online services, event hosting, information technology providers, auditing, reference checking, professional advisory (including legal, accounting, financial and business consulting), mailing vendor, delivery, technology, website, research, banking, payment, client contact, data processing, insurance, forensic, litigation support, marketing and security services.
- All, or most, of the assets of HammondCare or any single business unit within HammondCare are merged with or acquired by a third party, or we expand or re-organise our business, in which case your personal data may form part of the transferred or merged assets.
- We are under a legal, regulatory or professional obligation to do so (for example, in order to comply with a Court Order).

Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on HammondCare's behalf. When such third parties no longer need your personal data to fulfil this service, they will dispose of such details in line with HammondCare's procedures unless they are themselves under a legal obligation to retain information (provided that this will be in accordance with applicable data privacy laws). If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

We also provide anonymous statistical information about users of our websites and related usage information to reputable third parties, including analytics and search engine providers.

We own the database rights in the information collected via our online services. We do not sell, rent, or otherwise share information that reasonably identifies you or your organisation with unaffiliated entities for their independent use except as expressly described in this Privacy Notice or with your express prior permission.

We may share information that does not reasonably identify you or your organisation as permitted by applicable law.

## **8. International Transfers**

Where you are submitting personal data from within the European Economic Area ("EEA"), such information may be transferred to countries outside the EEA.

By way of example, this may happen if one or more of our third party service providers with whom we share personal data in accordance with section 7 (Disclosure of your information) are located, or have their servers located, outside your country or the country from which the data were provided.

If we transfer your information outside the EEA in this way, we will take steps to ensure that your privacy rights continue to be protected.

## **9. Retention of your data**

We retain the information we collect no longer than is reasonably necessary to fulfil the purposes that such data was originally collected in accordance with our internal data retention policies or to comply with our legal and regulatory obligations.

Please note that special rules apply to health records and these may often be kept for longer periods of time than other personal data collected about you in accordance with our internal retention policy.

A maintained copy of our retention policy is available upon request.

### **Security**

We take steps to hold information securely in electronic or physical form.

Our information security policy is supported by a variety of processes and procedures, and we store information in access controlled premises or electronic databases requiring logins and passwords. All employees, officers or contractors of HammondCare and third party providers with access to confidential information are subject to access controls and confidentiality obligations, and we require our third-party data storage providers to comply with appropriate information security industry standards.

Whilst we continually strive to ensure that our systems and controls are updated to reflect technological changes, the transmission of information via the internet is not completely secure, and as such we cannot guarantee the security of your data transmitted to our online services which is at your own risk.

If you communicate with us using a non-secure web platforms, you assume the risks that such communications between us are intercepted, not received, delayed, corrupted or are received by persons other than the intended recipient.

Once we have received your information, we will take reasonable steps to use procedures and security features to try to prevent unauthorised access, modification or disclosure.

You can help us to keep your information secure by ensuring that any user name or password in relation to our online services is kept strictly personal to you and not be made available to any other person. You should stop using your username and password and notify us immediately if you suspect that someone else may be using your user details or password.

## **10. Cookies Policy**

Our website and services delivered online use cookies and other similar technologies, for example, to distinguish you from other users when you browse our websites or use our online services and to allow us to improve our online services.

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently to improve the user experience, as well as to provide certain information to the owners of the site.

We may, for example, collect information about the type of device you use to access our online services, the operating system and version, your IP address, your general geographic location as indicated by your IP address, your browser type, the content you view and features you access on our online services, the web pages you view immediately before and after you



access our online services, whether and how you interact with content available on our online services, and the search terms you enter on our online services.

HammondCare's website sets cookies which remain on your computer for differing times. Some expire at the end of each session and some remain for longer so that when you return to our website, you will have a better user experience.

### **Which cookies we use**

Detailed below are the cookies we use and why and how long they last.

#### **For the dementia.com.au website, managed by DDSN (our website agency)**

Google Analytics:

User and event data retention: 26 months

Session timeout: 30 minutes

Campaign timeout: 6 months

Cookies from the CMS:

cm3sessioncm3sidfrontend: 8 hours (or browser is closed)

cmUserCookie: approx. 14 days (depending on use)

#### **For hammond.com.au dementiacentre.com and dementiaconference.com, managed by Butterfly (our other website agency)**

For hammond.com.au dementiacentre.com and dementiaconference.com, managed by Butterfly (our other website agency)

<i>Cookie Name</i>	<i>Expiration Time Description</i>
<i>_ga</i>	<i>2 years. Used to distinguish users.</i>
<i>_gid</i>	<i>24 hours. Used to distinguish users.</i>
<i>_gat</i>	<i>1 minute. Used to throttle request rate. If Google Analytics is deployed via Google Tag Manager, this cookie will be named dc_gtm&lt;property-id&gt;.</i>
<i>AMP_TOKEN</i>	<i>30 seconds to 1 year. Contains a token that can be used to retrieve a Client ID from AMP Client ID service. Other possible values indicate opt-out, inflight request or an error retrieving a Client ID from AMP Client ID service.</i>
<i>gac&lt;property-id&gt;</i>	<i>90 days Contains campaign related information for the user. If you have linked your Google Analytics and Google Ads accounts, Google Ads website conversion tags will read this cookie unless you opt-out. Learn more.</i>

We collect standard internet log information and details of visitor behaviour patterns by using Google Analytics cookies. We do this to compile reports and to help us find out things such as the number of visitors to the various parts of our website, so that this can be improved. This

*information does not identify visitors or collect any personal details. We do not make any attempt to find out the identities of those visiting our websites. We will not associate any data gathered in this way with any personal data from any source. For more information about Google Analytics cookies please see the link [here](#).*

*To provide website visitors with more choice on how their data is collected by Google Analytics, Google have developed the Google Analytics Opt-out Browser Add-on. The add-on communicates with the Google Analytics JavaScript (ga.js) to indicate that information about the website visit should not be sent to Google Analytics. The Google Analytics Opt-out Browser Add-on does not prevent information from being sent to the website itself or to other web analytics services. For more information about Google Analytics Opt-out Browser Add-on please see the link [here](#).*

#### Control of cookies

Web browsers allow you to exercise some control of cookies through the browser settings. Most browsers enable you to block cookies or to block cookies from particular sites. Browsers can also help you to delete cookies when you close your browser. You should note however, that this may mean that any opt-outs or preferences you set on our website will be lost. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org) which includes information on how to manage your settings for the major browser providers

### **11. Online services - Links to third party sites, services and content**

In addition to our online services, which we control directly, we also use and provide links to websites which are controlled by third parties, which may include:

- Twitter, LinkedIn and YouTube, where we have certain HammondCare accounts and profiles.
- Facebook, where we have a social page.
- Instagram, Vimeo, Google drive

If you use or follow a link to any of these third-party websites, please be aware that these websites have their own privacy policies and that we cannot accept any responsibility for their use of information about you.

Our online services may include integrated content or links to content provided by third parties (such as video materials). This Privacy Notice does not address the privacy, security, or other practices of the third parties that provide such content.

We engage third parties that support the operation of our online services, such as analytics providers. These third parties may use technologies to track your online activities over time and across different websites and online platforms. Please see section 10 (Cookies Policy) above for more information.

### **12. Your Rights**

Under applicable data protection legislation, we have a duty of care to ensure that your personal data is accurate and up to date. Therefore, please contact us to update or correct your information if this changes or if you believe that any information that we have collected about you is inaccurate at [europa@dementiacentre.com](mailto:europa@dementiacentre.com) or [Privacy@hammond.com.au](mailto:Privacy@hammond.com.au).

Where you have consented to our processing of certain personal data, you can at any time withdraw such consent and/or tell us not to contact you with updates and information regarding our products and services (or part of them) either at the point such information is collected, (by leaving the relevant box unticked) or, where you do not wish us to continue to use your information in this way, by following the unsubscribe instructions on any communications sent to you. Please note that where you withdraw your consent we will no longer be able to provide you with the products or services that rely on having your consent. You can also exercise this right at any time by contacting us using the contact details at the end of this Privacy Notice.

You can request:

- access to the personal data we hold about you
- corrections or updates to your details;
- the erasure of your personal data;
- the portability of personal data that you have provided to us in a structured, commonly used and machine-readable format.

You also have the right to object to, or request the restriction of, our use of your personal data.

If you would like to exercise any of the rights set out in this section, please contact us using the details set out in sections 14 and 16 (Further information) below. We may refuse to provide access where we have legitimate reasons for doing so under applicable data privacy laws, and in exceptional circumstances may charge a fee for access if the relevant legislation allows us to do so, in which case we will provide reasons for our decision.

You may submit a complaint to the Information Commissioners Office, details of which can be found at <https://ico.org.uk/global/contact-us>.

If you make a privacy complaint, we will respond to let you know how your complaint will be handled. We may ask you for further details, consult with other parties and keep records regarding your complaint.

### **13. Status of this statement**

Your provision of personal data to us or use of our online services constitutes your acceptance of the terms of this Privacy Notice.

As technologies and information governance practices develop, and data privacy laws (and surrounding guidance) evolve, we may need to revise this Privacy Notice. You should therefore review this page regularly to ensure that you are aware of any changes to its terms.

We will post any Privacy Notice changes on this page and, if the changes are significant or may materially impact upon your rights, we will provide a more prominent notice or contact you by other means (including, for certain services, email notification of Privacy Notice changes).

### **14. Further information**

To find out more about HammondCare please visit [www.hammond.com.au](http://www.hammond.com.au); [www.dementia.com.au](http://www.dementia.com.au); [www.dementiaconference.com](http://www.dementiaconference.com); or [www.dementiacentre.com](http://www.dementiacentre.com).

HammondCare at your request, can confirm what information we hold about you and how it is processed. If HammondCare does hold personal data about you, you can request the following information by contacting us using the details below:

- Identity and the contact details of the person or organisation that has determined how and why to process your data.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of HammondCare or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- How long the data will be stored.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

In order to verify the identity of those who make a request to us, we will accept the following forms of ID when information on your personal data is requested:

- Passport,
- Driving licence, Birth certificate,
- Utility bill dated within the last 3 months.

## 15. Contact

Due to our size, we have determined that we are not required to have a Data Protection Officer (DPO) at this current time, as we do not yet process special categories of data on a large scale. Nonetheless, to ensure that every individual's data rights are respected and that there is the highest level of data security and protection in our organisation, we have appointed a Privacy Officer as detailed below.

The position of the Privacy Officer, its responsibilities and the nature of the data we process is under regular review. Where circumstances require us to appoint a DPO then this Privacy Notice will be updated to include the details of the appointed DPO.

The Privacy Officer will report to the highest management level of the organisation. We will support the Privacy Officer with the necessary resources to carry out their tasks and ensure that they can maintain expertise.

If you have any questions, concerns or comments about this Privacy Notice, or want to submit a written complaint about how we handle your personal data, please contact us via any of the following means:

Our contact details are as follows:

UK contact address: Julie Christie, HammondCare International Ltd., 10 John Street,  
London, WC1N 2EB

Email: [europa@dementiacentre.com](mailto:europa@dementiacentre.com)

Tel: [+44 \(0\) 7787 168168](tel:+44(0)7787168168)

The Acting Privacy Officer for HammondCare International is: Julie Christie

*HAMMONDCARE INTERNATIONAL LIMITED PRIVACY NOTICE FOR WEBSITE*

Australia contact address: Marie Alford, HammondCare, Level 4, 207B Pacific Highway,  
St. Leonards, NSW 2065, Australia

Email: [australia@dementiacentre.com](mailto:australia@dementiacentre.com)

Tel: [+61 2 8437 7355](tel:+61284377355)

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