





Privacy Notice

This notice applies to all websites, apps & services developed and delivered by Care App Solutions Ltd. Care App Solutions Ltd is a Scottish Registered Company based in Scotland (SC534162) and considers Scottish law to be its lead supervisory authority. All significant decisions about data processing and policy implementation will be made using GDPR. This policy is set out to help you understand the types of data that we collect from you and or your business and how that data is used and managed

Commitment

We are committed to protecting the privacy and security of your personal information, we continually monitor compliance through implementing policies & procedures to safeguard data and by setting regular reviews to manage these policies and procedures.

Data Controller

In accordance with ICO Requirements of Data Controllers Care App Solutions Ltd is registered with the Information Commissioners office (ZA279938). As a software Solutions provider to other data controllers Care App Solutions Ltd provides GDPR business support & software solution platforms on a Business-to-Business Relationship for the purposes of Business operations & care provision.

Information we collect

We have a number of different applications & business processes that collect information. We will collect some or all the categories listed. Each business we provide a platform to has individual responsibility to adhere to the requirements of UK GDPR the conditions listed in Article 9(2) of UK GDPR and will require explicit consent where applicable

- Personal Information such as name, address, date of birth, gender, email, phone number, Photo ID
- Sensitive information such as Health & Medical History, Religious, Sexual Orientation, Race, Ethnic Origin
- Information around day-to-day health and wellbeing including GP practice and Key care providers
- **Biometrics information**
- Operating Systems, IP address, Mobile & Desktop device identifiers
- Relationship information, Friends Family and Legal relationship documentation
- Case Study information including media images around the use of the software we have delivered
- Criminal Records Data such as Disclosure Certificates

How we use your information

- To carry out our obligations arising from any contracts entered into by you and us
- Seek your views or comments on the services we provide
- Notify you of changes to our services
- Case study information may be available on our website for marketing purposes
- Carry out GDPR Business Support on behalf of other organisations
- Validation of Identity
- Profiling we may analyse your personal information to create a profile of your interests and preferences so that we can contact you with information relevant to you. We may make use of additional information about you when it is available from external sources to help us do this effectively. We may also use your personal information to detect and reduce fraud and credit risk.
- Like many other websites we use cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. For

- example, we use cookies to store your country preference. This helps us to improve our website and deliver a better more personalised service. It is possible to switch off cookies by setting your browser preferences. Turning cookies off may result in a loss of functionality when using our websites
- Our website may contain links to other websites run by other organisations. This privacy policy applies only
 to our website, so we encourage you to read the privacy statements on the other websites you visit. We
 cannot be responsible for the privacy policies and practices of other sites even if you access them using links
 from our website. In addition, if you linked to our website from a third-party site, we cannot be responsible
 for the privacy policies and practices of the owners and operators of that third party site and recommend
 that you check the policy of that third party site.
- Job applications form part of our recruitment process to validate and evaluate and review potential and existing staff.

Lawful Basis

We apply the GDPR principles to all personal & Sensitive data that we hold or process

- 1) Processed lawfully, fairly and in a transparent manner in relation to individuals.
- 2) Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.
- 3) Adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.
- **4)** Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.
- 5) Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals.
- 6) Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Sharing Information

- We will not sell or rent your information to third parties
- We will not share your information with third parties for marketing purposes
- We may be required to transfer your information to a third party as part of a sale of some or all of our business assets to third party as part of any business restructuring or reorganization.
- We may also be required to disclose or share your personal data in order to comply with any legal obligation or to enforce or apply our terms of use or to protect the rights, property or safety of our supporters and customers. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.

Children

We do not anticipate providing services directly to children, however we do understand that if this change occurs, we will make provisions to verify age. We will also make further provisions to gain parental or guardian consent for data processing activity where required.

Data Breaches

Care App Solutions will continue to look for new ways to protect data however in the event of a data breach. we will notify the ICO within 72 hours of becoming aware of the breach, where we don't yet have all the relevant details we will notify when we expect to have the results of the investigation. we have implemented the ICO guidance framework on managing a security breach document 20121212 version :2.1 This framework includes the following

- *Containment and recovery
- * Assessing the risk/impact
- * Notification of Breaches
- * Evaluation & Response

International

All significant decisions about data processing and policy implementation will be made using UK & EU GDPR. As part of the services offered to you the information which you provide to us will not be transferred to countries outside the European Union ("EU") with the exception of the UK our servers are Located inside the UK. If we have a requirement to transfer your information outside of the EU in any way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy.

If you use our services while you are outside the UK or EU, your information may be transferred outside the EU in order to provide you with those services.

Your data protection rights

Under data protection law, you have rights we need to make you aware of. The rights available to you depend on our reason for processing your information.

Your right of access- You have the right to ask us for copies of your personal information. This right always applies. There are some exemptions, which means you may not always receive all the information we process.

Your right to rectification - You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies.

Your right to erasure- You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your information in certain circumstances.

Your right to object to processing - You have the right to object to processing if we are able to process your information because the process forms part of our public tasks, or is in our legitimate interests.

Your right to data portability- This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another or give it to you. The right only applies if we are processing information based on your consent or under, or in talks about entering into a contract and the processing is automated.

Please contact us at lnfo@careappsolutions.com if you wish to make a request.

Further information around your rights can be found at https://ico.org.uk/your-data-matters/

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