

Privacy Policy

LAST UPDATED: 4 July 2017

C.L.C.A. Company Limited obtains and processes personal data relating to clients and employees (including self-employed contractors). We ask that you read this Privacy Policy carefully as it contains important information about what to expect when we collect personal information about you and how we will use your personal data.

This Privacy Policy applies to our use of any and all Data collected by us or provided by you in relation to your use of the Website and/or our Call Centre and/or the services we provide through the Website and/or our Call Centre. We have a legal and ethical responsibility to safeguard the privacy of our clients, employees and other parties by protecting all personal data in our possession. We are bound by the Data Protection Act 1998 and other relevant laws and regulations. We are also bound by codes of conduct implemented by the ICO and by industry codes of practice.

We may make changes to this Privacy Policy from time to time. We may notify you of such changes by any reasonable means, including by posting the revised version of this Privacy Policy on the Website. You can determine when we last changed this Privacy Policy by referring to the 'LAST UPDATED' statement above. Your use of the Website following changes to this Privacy Policy will constitute your acceptance of those changes.

1. Definitions and Interpretations

1.1. In this Privacy Policy, the following definitions are used:

Data	collectively all information that you submit to us via the Website or the Call Centre. This definition incorporates, where applicable, the definitions provided in the Data Protection Act 1998.
Call Centre	C.L.C.A. Call Direct, Suite 202, Corporate Centre Building, 948 Aurora Blvd, Cubao, Quezon City, Philippines.
C.L.C.A. Company Limited we, us or our	a company incorporated in England and Wales with registered number 08326310 whose registered office is Moneybrook Lodge, Hereford Road, Shrewsbury, Shropshire SY3 9LB.
Cookies	a small text file placed on your computer by this Website when you visit certain parts of the Website and/or when you use certain features of the Website. Details of the cookies used by this Website are set out in the clause below (Cookies).
UK and EU Cookie Law	the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011.

User or you	clients, employees and other parties who provide personal Data through the Website and/or Call Centre.
Website	the website that you are currently using, https://www.carerbooking.com , and any sub-domains of this site unless expressly excluded by their own terms and conditions.

1.2. In this Privacy Policy, unless the context requires a different interpretation:

1.2.1. the singular includes the plural and vice versa;

1.2.2. references to sub-clauses, clauses, schedules or appendices are to sub-clauses, clauses, schedules or appendices of this Privacy Policy;

1.2.3. a reference to a person includes firms, companies, government entities, trusts and partnerships;

1.2.4. "including" is understood to mean "including without limitation";

1.2.5. reference to any statutory provision includes any modification or amendment of it;

1.2.6. the headings and sub-headings do not form part of this Privacy Policy.

2. **Data we collect about you**

2.1. For the Purpose of the Data Protection Act 1998, C.L.C.A. Company Limited is the 'data controller'.

2.2. We and our Call Centre may collect some or all of the following Data, which includes sensitive personal Data, from you. The actual Data that we collect will depend upon whether you are a client or prospective client or an employee or prospective employee.

Name;

Date of Birth;

Gender;

Racial or Ethnic Origin;

Religious Beliefs;

Physical or Mental Health or Condition;

Details of Criminal Convictions;

Job Title;

Profession;

Contact Information such as email addresses and telephone numbers;

Demographic information such as post code, preferences and interests;

Financial information such as credit / debit card numbers;

IP address (automatically collected);

Web browser type and version (automatically collected);

Operating system (automatically collected);

A list of URLs starting with a referring site, your activity on this Website, and the site you exit to (automatically collected);

House entry instructions;

General conditions;

Favourite activities;

Pets at home;

Footwear allowed in the home;

Transportation preferences;

Diet;

Smoking;

Emergency information;

Service related health information in each case, in accordance with this Privacy Policy.

3. How we will use the Data about you

3.1. We and our Call Centre gather this information for the following purposes and use:

3.1.1. *Clients*: to allow us to process your registration as a client or prospective client, process any requests or preferences for care provision, identify how the care is to be funded, assist you in arranging funding where appropriate, deliver the services requested, and seek payment from you or third parties for those services provide statements of your account and to communicate with you on any matter relating to the conduct of your account and services in general;

3.1.2. *Employees*: for all purposes associated with the administration of the employer/employee relationship (including subcontractors, agency staff and consultants), to enrol you as a carer available to work through the Website, to administer our relationship with you including the monitoring of our communications and to check for compliance with our relevant policies and legal obligations.

3.2. If you agree, we may also contact you about other products and services we think may be of interest to you.

3.3. We may also use aggregate information and statistics for the purposes of monitoring website usage in order to help us to develop our website and our services.

3.4. We may also provide such aggregate information to third parties. These statistics will not include information that can be used to identify you.

3.5. From time to time we may provide your information to our customer service agencies for research and analysis purposes so that we can monitor and improve the services we provide.

3.6. We or our agents and sub-contractors may contact you by post, email or telephone to ask you for your feedback and comments on our services.

4. Third party websites and services

- 4.1. We may, from time to time, employ the services of other parties for dealing with certain processes necessary for the operation of the Website. The providers of such services have access to certain personal Data provided by Users of this Website. This would include for example our Call Centre and card payment service providers.
- 4.2. Any Data used by such parties is used only to the extent required by them to perform the services that we request. Any use for other purposes is strictly prohibited. Furthermore, any Data that is processed by third parties will be processed within the terms of this Privacy Policy and in accordance with the Data Protection Act 1998.

5. **Marketing**

- 5.1. We may also wish to provide you with information about special features of our website or any other service or products we think may be of interest to you. If you would rather not receive this information, please notify us by email to cherry.adams@clcacompanyltd.co.uk. If you agree to us providing you with marketing information, you can always opt out at a later date.
- 5.2. We may also want to provide you with related information from third parties we think may be of interest to you. If you would rather not receive this information, please notify us by email to cherry.adams@clcacompanyltd.co.uk. If you agree to us providing you with third party marketing information, you can always opt out at a later date.
- 5.3. We may also provide your information to carefully selected third parties whose products or services we believe may be of interest to you. If you do not wish us to disclose your information in this way, please notify us by email to cherry.adams@clcacompanyltd.co.uk.

6. **Cookies**

- 6.1. This Website may place and access certain Cookies on your computer. We use Cookies to track visitor use of the website; to compile statistical reports on website activity; to improve your experience of using the Website; and to improve our range of services.
- 6.2. All Cookies used by this Website are used in accordance with current UK and EU Cookie Law.
- 6.3. Before the Website places Cookies on your computer, you will be presented with a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies, you are enabling us to provide a better experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of the Website may not function fully or as intended.
- 6.4. This Website may place the following Cookies:
 - Strictly necessary cookies:* These are cookies that are required for the operation of the Website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
 - Analytical/performance cookies:* They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
 - Functionality cookies:* These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

Targeting cookies: These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

- 6.5. You can choose to enable or disable Cookies in your internet browser. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser.
- 6.6. You can choose to delete Cookies at any time; however you may lose any information that enables you to access the Website more quickly and efficiently including, but not limited to, personalisation settings.
- 6.7. It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.

7. How we protect your information

- 7.1. Data security is of great importance to us and to protect your Data, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure Data collected via this Website and our Call Centre. This includes using antivirus protection, firewalls and passwords for restriction of access to secure areas. All staff involved in processing Data, including staff in our Call Centre, have received training by us. The transfer of personal data between us and third parties is done using encryption technologies.
- 7.2. If password access is required for certain parts of the Website, you are responsible for keeping this password confidential.
- 7.3. We will use all reasonable efforts to safeguard your personal information. However, you should be aware that the use of the Internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal information which is transferred from you or to you via the Internet.

8. Overseas transfers

- 8.1. The information you provide may be transferred to countries outside the European Economic Area (EEA) that do not have similar protections in place regarding your Data and restrictions on its use as set out in this policy. However, we will take steps to ensure adequate protections are in place to ensure the security of your Data. The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein.
- 8.2. By submitting your Data you consent to these transfers for the purposes specified above.

9. Call Centre

- 9.1. Our Call Centre is based in the Philippines. The Data privacy legislation in the Philippines generally does not apply to Data lawfully collected from residents of foreign jurisdictions. The Data that you provide to the Call Centre by telephone will be input by them to a computer linked to a server owned by us in the UK. The Call Centre, whilst still an independent legal entity to us, has been set up by us and the staff running this are trained by us. The Call Centre is contractually obliged to us to treat your Data in accordance with the Data Protection Act 1998.
- 9.2. By submitting your Data through the Website and/or the Call Centre, you consent to this for the purposes specified above.

10. Access to your information and updating and correcting your information

- 10.1. You have the right to ask for a copy of any of your personal Data held by us (where such Data is held). We may make a small charge for this service.
- 10.2. We want to ensure that your personal information is accurate and up to date. If any of the information that you have provided to us changes, for example if you change your email address, name or payment details, or if you wish to cancel your registration, please let us know the correct details by sending an email or letter to us.
- 10.3. You may ask us, or we may ask you, to correct information you or we think is inaccurate, and you may also ask us to remove information which is inaccurate.

11. **Sale of business**

- 11.1. If our business is sold or integrated with another business your details may be disclosed to our advisers and any prospective purchasers and their advisers and will be passed on to the new owners of the business.

12. **Your consent**

- 12.1. By submitting your Data you consent to the use of that information as set out in this policy.

13. **Changes to Privacy Policy**

- 13.1. We reserve the right to change this Privacy Policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website and you are deemed to have accepted the terms of the Privacy Policy on your first use of the Website following the alterations.

14. **How to contact us**

- 14.1. We welcome your views about our website and our Privacy Policy. If you would like to contact us with any queries or comments please send an email to cherry.adams@clcacompanyltd.co.uk; or send a letter to Mrs C. Adams, C.L.C.A. Company Limited, Unit 7 Henry Close, Battlefield Enterprise Park, Shrewsbury, Shropshire SY1 3TJ.

15. **Links to other websites**

- 15.1. Our Website may contain links to other websites. This Privacy Policy only applies to this Website so when you link to other websites you should read their own privacy policies.

16. **General**

- 16.1. You may not transfer any of your rights under this Privacy Policy to any other person. We may transfer our rights under this Privacy Policy where we reasonably believe your rights will not be affected.
- 16.2. If any court or competent authority finds that any provision of this Privacy Policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this Privacy Policy will not be affected.
- 16.3. Unless otherwise agreed, no delay, act or omission by us in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.
- 16.4. This Privacy Policy is governed by and interpreted according to English law. All disputes arising under this Privacy Policy are subject to the exclusive jurisdiction of the English courts.