



**Little Sisters  
of the Poor**  
*HOSPITALITY AT HEART*

## **PRIVACY NOTICE – INDEPENDENT LIVING UNITED KINGDOM**

In accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, this Notice sets out what information Little Sisters of the Poor (LSP) holds on Independent Living Residents, their families or those with power or attorney. It explains how we use that information, how it is protected and the rights of those whose information we hold.

### **Who we are and Contact Details**

The Little Sisters of the poor is the Data Controller for the personal information that we process. The Little Sisters of the Poor care for the elderly poor in the spirit of humble service which we have received from Jeanne Jugan. The Little Sisters of the Poor have the following registered addresses.

**England** Registered Charity Number: 234434

Provincial Residence  
Little Sisters of the Poor  
St. Peters Residence  
2A Meadow Road  
South Lambeth  
London  
SW8 1QH



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**Scotland (Glasgow)** Scottish Charity Number: SC1047370

St Joseph's  
Little Sisters of the Poor  
14 Cumnock Road  
Glasgow  
G33 1QT

**Scotland (Greenock)** Scottish Charity Number: SC1047397

Holy Rosary  
Little Sisters of the Poor  
44 Union Street  
Greenock  
PA16 8DP

If you have any questions, wish to make a data protection complaint, or you wish to exercise your rights, please contact our Data Protection Officer, using the details below.

Email (England): [DPO@LSPLONDON.CO.UK](mailto:DPO@LSPLONDON.CO.UK)

Email (Scotland): [DPO@LSPSCOTLAND.COM](mailto:DPO@LSPSCOTLAND.COM)

Post: Data Protection Officer  
Little Sisters of the Poor  
St. Peters Residence  
2A Meadow Road  
South Lambeth  
London SW8 1QH

Title: Privacy Notice – Independent Living United Kingdom

Version: 4.0

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## **Independent Living Residents**

### **What data do we have?**

So that we can provide a safe and professional service, we need to keep certain records about you. We may process the following types of data:

- Your basic details and contact information e.g. your name, address, date of birth and next of kin;
- Your financial details e.g. details of how you pay us for your accommodation or your funding arrangements.

We also record the following data which is classified as “special category”:

- Health and social care data about you, which might include both your physical and mental health data.
- We may also record data about your race, ethnic origin, sexual orientation, Bio-Metric information or religion in order to provide you the holistic and individualised support, you can ask is not to record some of these if you wish.

### **Why do we have this data?**

We need this data so that we can provide high-quality care and support. By law, we need to have a lawful basis for processing your personal data. We process your data because:

- Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract, such as when you apply to become an Independent Living resident.
- Recognised Legitimate Interests: The Little Sisters of the Poor have recognised legitimate interests in processing personal data for the purpose of crime prevention, safeguarding, emergencies

We process your special category data because in addition to the lawful basis we also have the following exemption (article 9) justification(s).



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- Processing is necessary for the purposes of, the provision of health or social care or treatment or the management of health or social care systems and services
- Processing is done with your explicit consent to support you living in the independent living environment.

We also process your data with your consent. If we need to ask for your permission, we will offer you a clear choice and ask that you confirm to us that you consent. We will also explain clearly to you what we need the data for and how you can withdraw your consent at any time.

**Who we share data with**

So that we can provide you with high quality care and support we need specific data. This is collected from or shared with:

1. You or your legal representative(s);
2. Third parties such as GP, Other health & social care providers
3. Local Authorities
4. Funding Authorities
5. Your family and friends – with your permission
6. Organisations we have a legal obligation to share information with
7. The police or other law enforcement agencies if we have to by law or court order.
8. Payment processors – to enable us to process your payments. We use consistent third-parties who act as data processors on our behalf to provide specific services.

We do this face to face, via phone, via email, via post, via application forms, via digital transfer. The Little Sisters of the Poor store data within the UK and European Economic Area.

We may also share your data with third parties as part of a Company sale or restructure, or for other reasons to comply with a legal obligation upon us.



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We have a data processing agreement in place with such third parties to ensure data is not compromised. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

### **Information Security**

The Little Sisters of the Poor have in place organisational and technical measures to provide security to your information. This includes restricted access to your personal information to those Sisters, Staff and Volunteers whose role requires them to process your information to provide you with support.

### **How Long is your information kept**

The Little Sisters of the Poor only keep your personal information for as long as it is necessary to fulfil the purpose it was collected for, including satisfaction of legal requirements. At the end of the retention period your information will be confidentially and securely destroyed or anonymised.

For Independent Living Residents records this is currently 8 years after the date you leave the organisation.

### **Your rights**

Under Data Protection Legislation you have the following rights

1. You have the right to be informed about how and why your data is being used (Covered by this Privacy Notice)
2. The right to access the personal information we hold about you and obtain a copy of that information.
3. You have the right to rectification, ask us to correct any data we have which you believe to be inaccurate or incomplete by informing our Data Protection Officer.



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4. You have the right to ask that we erase any of your personal data which is no longer necessary for the purpose we originally collected it for.
5. You may also request that we restrict processing if we no longer require your personal data for the purpose, we originally collected it for, but you do not wish for it to be erased.
6. You have the right to data portability; you can request the personal information provided by yourself be exported in a universal format so it can be imported into another system
7. You have the right to object. If we are processing your data as part of our legitimate interests as an organisation or in order to complete a task in the public interest, you have the right to object to that processing. We will restrict all processing of this data while we look into your objection – please contact us to do so.
8. You have the right not to be subject to automated decision-making including profiling.

To exercise any of these rights please contact The Data Protection Officer for The Little Sisters of the Poor (Contact details in Contact Details and Who We Are and Contact Details Section)

You may need to provide adequate information for our staff to be able to identify you, for example, a passport or driver's licence. This is to make sure that data is not shared with the wrong person inappropriately. We will always respond to your request as soon as possible and at the latest within one month.



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**Raising a Complaint**

If you would like to make a complaint about how we have dealt with your request(s), or how we use your information, please contact:

Greg Mintern

Data Protection Officer

Email (England): [DPO@LSPLONDON.CO.UK](mailto:DPO@LSPLONDON.CO.UK)

Email (Scotland): [DPO@LSPSCOTLAND.COM](mailto:DPO@LSPSCOTLAND.COM)

Post: Provincial Residence  
Little Sisters of the Poor  
St. Peters Residence  
2A Meadow Road  
South Lambeth  
London SW8 1QH

If you are not satisfied with our response to your complaint, you are able to raise the issue and complain to our regulator, The Information Commissioner's Office (ICO), they can be contacted in the following ways:

Post: Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Online: <https://ico.org.uk/global/contact-us/>