



KareInn

Data Privacy Policy

KareInn (“We”) are committed to protecting and respecting your privacy, whether you are a service user under the care of one of our customers (a “Care Provider”), an employee of a Care Provider, an external professional engaged in a service users care, or a member of the public engaging with us. Our mission is to assist care teams in co-ordinating high-quality care and we consider protection of the data we process a central component of our work. Our services are designed for caring for service users including those who may be vulnerable and unable to provide consent to treatment or understand this policy. Where this policy is addressed to service users, it should be read as also addressed to family, friends and representatives with the legal authority to act on a service user’s behalf if applicable.

This policy (together with our terms of use any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. If you represent a Care Provider, your agreement with us and any T&Cs we ask you to sign will also govern the way we process personal data.

For the purpose of the EU General Data Protection Regulation 2016/679 (GDPR), the controller of your data is KareInn Limited a company registered in England and Wales under company number 09705701 whose registered office is at Huckletree, 18 Finsbury Square, London, United Kingdom, EC2A 1AH.

All your data will be held and used in accordance with the GDPR and any relevant national laws which implement the GDPR and any legislation that replaces it (“Data Protection Legislation”).

Information We may Collect from You

We may collect and process the following data about you:

- **Information you give us.** You may give us information about you by filling in forms on the KareInn sites <https://www.kareinn.com/> or <https://www.inserv.io> (our “Sites”), through the KareInn app (our “App”) or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our Sites, our App, book a demo, subscribe to our service, make an enquiry, provide feedback and when you report a problem with our site. The information you give us may include your name, address, e-mail address, phone number, details of your employer or the Care Provider you represent and other identification details that assist us in providing our services.
- **Information we collect about you.** With regard to each of your visits to our Site or App we may automatically collect the following information:
 - technical information, including the Internet protocol (IP) address used to connect your computer or device to the Internet, your login information, browser type and version, location, time zone setting, browser plug-in types and versions, operating system and platform;

- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our Site or App (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.
- **Information we receive from Care Providers.** Our Sites and App allow care professionals to better plan care and organise personal information belonging to the service users they care for. If your care team uses our Sites or App to co-ordinate your treatment, we will collect:
 - Information about you including your name, age, gender, religion, next of kin, address, phone number;
 - Information about your care plan, your medical history, the medication you take, your care team, your location and other medical notes uploaded by your care team;
 - Information relating to your interaction with your Care Provider and your activities of daily living;
 - Other information relevant to the provision of your care in any formats used by your Care Provider including photographs, sound recordings and videos.

This personal data is considered sensitive personal data under Data Protection Law because it relates to your health. Please see the section below that addresses our legal basis for processing your information for more details.

- **Information we receive from other sources.** We may also receive information about you if you use any of the other websites we operate or the other services we provide. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

Cookies

Our Sites and App use cookies to distinguish you from other users. This helps us to provide you with a good experience when you browse our website and also allows us to improve our sites.

Uses made of the Information

We use information held about you in the following ways:

- **Information you give to us.** We will use this information:

- to carry out our obligations arising from any contracts entered into between you and us or your Care Provider and us and to provide you with the information, products and services that you request from us;
- to provide you with information about other goods and services we offer that are similar to those that you already use;
- to notify you about changes to our service;
- to ensure that content from our Sites and App is presented in the most effective manner for you and for your computer or device.
- **Information we collect about you.** We will use this information:
 - to administer our Sites and App and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
 - to improve our Sites and App to ensure that content is presented in the most effective manner for you and for your computer or device;
 - to allow you to participate in interactive features of our service, when you choose to do so;
 - as part of our efforts to keep our Sites and App safe and secure;
 - to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
 - to make suggestions and recommendations to you and other users of our Sites and App about goods or services that may interest you or them.
- **Information we receive from other sources.** We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

The Legal Basis for Processing your Information

In accordance with GDPR, the main grounds that we rely upon in order to process your information are as follows:

- **Necessary for entering into or performing a contract.** In order to perform obligations which arise under any contract we have entered into with your employer or Care Provider, it will be necessary for us to process your information. In both cases, our policy is to ask our Care Providers to ensure they have the legal right to pass on your details to us. If you have any concerns about this, please review your Care Provider's privacy policy or contact them directly.
- **Necessary for compliance with a legal obligation.** We are subject to certain legal requirements which may require us to process your information. We may also be obliged by law to disclose your information to a regulatory body or law enforcement agency such as the Care Quality Commission or the Department of Health and Social Care. These organisations also have to adhere to GDPR and strict guidelines relating to personal data.

- **Necessary for the purposes of legitimate interests.** Either we or a third party will need to process your information for the purposes of our (or a third party's) legitimate interests, provided that we have established that those interests are not overridden by your rights and freedoms (including your right to have your information protected). Our legitimate interests include responding to requests and enquiries from you or a third party, optimising our sites and user experience, informing you about our services and ensuring that our operations are conducted in an appropriate and efficient manner. For the avoidance of doubt, this does not mean we can sell on your personal data or use it any way other than is set out in this privacy policy.
- **Consent.** In some circumstances, we may ask for your consent to process your information in a particular way. Under GDPR consent must be clear, unambiguous and freely given.

Processing Sensitive Personal data

The sensitive personal data provided to us by Care Providers is done so under the guidance of Registered Managers regulated by the Care Quality Commission, who are a health professional who has an obligation for patient confidentiality. The Registered Managers also approve any care plans held by our Sites or App.

If we process your sensitive personal data, we will only do so in a way that's necessary to fulfil the contract that we have with your care provider. It is our policy to ask Care Providers to ensure they have the legal right to pass on your details to us.

If you have any concerns about your data being shared or would like to discuss it with your Registered Manager, please review your Care Providers privacy policy or contact them directly.

Disclosure of your Information

We may share your information with selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you (for example we work with transcribing companies who assist us in uploading medical records when Care Providers first open accounts). It is our policy to carry out checks on any such companies we use. They must be GDPR compliant, sign our contract ensuring they will keep details protected to our standards.
- On an anonymous basis, analytics and search engine providers that assist us in the improvement and optimisation of our Sites and App. You will not be identifiable from this information, but we consider it important that you understand how our processes work.
- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets. If this were to happen there would be extremely strict non-

disclosure protections in place and access would not be given to sensitive personal data.

- If KareInn Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about Care Providers will be one of the transferred assets. Again, if this were to happen there would be extremely strict non-disclosure protections in place and access would not be given to sensitive personal data.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use or terms and conditions of supply and other agreements; or to protect the rights, property, or safety of KareInn Limited, Care Providers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
- We may also collect, use and share aggregated data such as statistical or demographic data for any purpose such as academic research or reviews into best practice for high quality care. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, usage data from all our account types is collated in Google Analytics for research and statistical purposes, but such data is anonymised (so that it can no longer be associated with you). However, if we combine or connect aggregated data with If there is any way aggregated data can be combined so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

Where we Store your Personal Data

We keep your information secure internally and limit access to as few of our team as possible. This means that even our developers cannot access the personal data on our Sites or App.

Many organisations use suppliers such as software providers, many of whom have global operations. To the extent that any of your data is provided to third parties outside the EEA, or accessed by third parties from outside the EEA, we will ensure that appropriate safeguards are in place in accordance with the GDPR (such as the European Commission's standard contractual clauses, or the EU/US Privacy Shield).

Unfortunately, the transmission of information via the internet is not completely secure. We will do our best to protect your personal data and take cyber security seriously. However, we cannot guarantee the security of your data transmitted to our Sites or App; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

How Long we Hold your Information

Under GDPR, we will only retain your information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements. The criteria that we use to determine retention periods will be determined by the nature of the data and the purposes for which it is kept, the sensitivity of the data and the potential risk of harm from unauthorised use or disclosure.

We consider it important to reduce as far as possible the risk of the records we store accidentally being deleted or becoming inaccessible because we never want to compromise the quality of care we facilitate. As a result, we are very cautious about permanently deleting information we hold and have IT solutions in place to prevent loss of service users' records. If you would like more information about our internal retention policy, please contact us on the details in the Contact Us section below.

Your Rights

You have certain rights in relation to the personal data that we hold about you. Details of these rights and how to exercise them are set out below. Please note we will require evidence of your identity or your legal authority to exercise rights on behalf of someone else before we are able to respond to your request.

- **Right of Access.** You have the right at any time to ask us for a copy of the personal information that we hold about you and to check that we are lawfully processing it. Where we have good reason, and if the GDPR permits, we can refuse your request for a copy of your personal information, or certain elements of the request. If we refuse your request or any element of it, we will provide you with our reasons for doing so.
- **Right of Correction or Completion.** If personal information we hold about you is not accurate or is out of date and requires amendment or correction you have a right to have the data rectified or completed.
- **Right of Erasure.** In certain circumstances, you have the right to request that personal information we hold about you is erased e.g. if the information is no longer necessary for the purposes for which it was collected or processed or our processing of the information is based on your consent and there are no other legal grounds on which we may process the information.
- **Right to Object to or Restrict Processing.** In certain circumstances, you have the right to object to our processing of your personal information. For example, if we are processing your information on the basis of our legitimate interests and there are no compelling legitimate grounds for our processing which override your rights and interests.

You may also have the right to restrict our use of your personal information, such as in circumstances where you have challenged the accuracy of the information and during the period where we are verifying its accuracy.

- **Right of Data Portability.** In certain instances, you have a right to receive any personal information that we hold about you in a structured, commonly used and machine-readable format.

In such circumstances, you can ask us to transmit that information to you or directly to a third party organisation.

While we are happy for such requests to be made, we are not able to guarantee technical compatibility with a third party organisation's systems. We are also unable to comply with requests that relate to personal information of others without their consent.

You can exercise any of these rights at any time by contacting us using the details in the Contact Us section below.

Right to Withdraw Consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. You can do this by contacting us using the details in the Contact Us section below.

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Complaints

If you are unhappy about our use of your information, you can contact us using the details in the Contact Us section below. You are also entitled to lodge a complaint with the UK Information Commissioner's Office using any of the below contact methods:

Telephone: 0303 123 1113

Website: <https://ico.org.uk/concerns/>

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

If you live or work outside of the UK or you have a complaint concerning our activities outside of the UK, you may prefer to lodge a complaint with a different supervisory authority.

Changes to our Privacy Policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our Privacy Policy.

Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Rachelle Mills by emailing support@kareinn.com.