



Privacy Policy

Arborvitae Care Services Ltd Privacy Policy as updated May 2024.

This Privacy Policy explains how Arborvitae Care Services Ltd handles the personal information that you provide to us controlled by Arborvitae Care Services Ltd which link to this Privacy Policy.

Please read this Privacy Policy before using Arborvitae Care Services Ltd or submitting personal information to us. Arborvitae Care Services Ltd (“we”, “us”) are a controller for the purposes of the Data Protection Act 1998 and the EU General Data Protection Regulation 2016/679. This means that we are responsible for, and control the processing of, the personal information you provide to us in accordance with this privacy policy.

Arborvitae Care Services Ltd understands that customers and employees care about the use and storage of their personal information and we value your trust in allowing us to do this in a careful and sensible manner. We have created this privacy policy statement in order to demonstrate our commitment to the privacy of our customers and employees.

By using our website (including our mobile site), our mobile app, our social media pages, our dedicated telephone line, our customer service function and any other Arborvitae Care Services Ltd service, you are acknowledging that we are processing your personal information and, where necessary consenting to such practices, as outlined in this statement.

What is "personal information" as used in this Privacy Policy?

“Personal information” means information that identifies you or could be used to identify you and which is submitted to and/or collected, in this instance, by Arborvitae Care Services Ltd. Examples of personal information include, but is not limited to, your name, your postal address, your e-mail address and your telephone number.

Personal information which we collect

We collect personal information about you (and others if their personal information is provided by you; when you:

- (a) provide personnel information for the purposes expected in the course of employment or providing service to the business;
- (b) register or alter details on an account;
- (c) request information, costs, quotations;
- (d) sign up for our newsletter and other marketing emails (in line with Marketing below);
- (e) post material to our website and/or social media page;
- (f) complete customer feedback or surveys;
- (g) raise a complaint or dispute with us or are involved in a legally recordable incident at our premises (e.g. in relation to health and safety reporting);
- (h) speak to one of our representatives, telesales/telemarketing employees or members of our customer services, accounts or PR team (this is not an exhaustive list);
- (i) participate in competitions or promotions;



(j) and/or use our website and customer applications in any other way.

The personal information collected in the above manner may include the following about you (and others if their personal information is provided by you):

- (a) full name;
- (b) postal address;
- (c) email address;
- (d) telephone number;
- (e) payment details;
- (f) geo-location;
- (g) machine identifiers (such as IP addresses);
- (h) dispute resolution information;
- (i) disability and health information;
- (j) supplementary information (dietary and other preferences and special requirements);
- (k) image data;
- (l) behavioural data (tags and cookies – see Cookies and Tracking section below);
- (m) voice recordings; and
- (n) identification information (such as passports, drivers' licences or national identity cards).

Personal information provided by third parties

We may receive information about you from other sources (such as the Mail Preference Service or DBS reference agencies), which we will add to the information we already hold about you in order to help us provide our products and services in accordance with your requirements and to ensure that the quality of data we have on your account(s) is maintained properly. We may also obtain information about you from social media providers such as Twitter and Facebook or from third party websites where you have left commentary or feedback about us.

How we use your information

We will collect personal information:

- 1) in order to take the necessary steps in preparation of, or to fulfil our obligations under, an order or a contract:
 - a) Orders and payments – provide communications about orders, products and services being provided to you (and others if their personal information is provided by you);



- b) Orders and account updates – send details of new, amended or cancelled orders or account details and changes – usually via email or telephone;
- c) Update you on matters affecting your order – contact you (and others if their personal information is provided by you) in the event of a change that affects a order or any data or personal information you have provided us with, such as changes to terms and conditions of order/contract or this privacy policy;
- d) Website service communication – provide notifications of any changes to our website or to our services that may affect you (and others if their personal information is provided by you);
- e) Customer service communication – provide you with requested information or correspondence, such as a response from us to an enquiry made by you;
- f) To provide assistance in completing orders – send reminder emails to continue with a booking which is in your “basket” on our websites or mobile app but is not paid and completed;
- g) Maintain your business accounts – create a profile about you in relation to your account, to update our records, create and maintain your account.

2) with your consent:

- a) Simplify payment process – use saved bank details within your account so that, upon making future payments, we have the convenient option of selecting a previously saved card in order to pay. This information is only used/accessed when you use your saved card to pay for an order;
- b) Marketing communications – create a profile about you for marketing purposes to tailor our communications to you. We may use automated processes to do this;
- c) Promotional offers – inform you about promotional offers and other products or services that may be of interest (in line with Marketing communications above);
- d) Maintain records indicating your consent to status – to ensure we accurately reflect your wishes when communicating to you;.

3) in our legitimate interest* improve our services:

- a) Market research – to contact you (and others if their personal information is provided by you) to ask about the experience using our services as part of a continual programme of customer service improvement. This is not marketing communication and is separate to Marketing communications above;
- b) Website customisation – to customise our website and its content to your particular preferences in accordance with the Cookies and Tracking section below;
- c) Customer support – monitor calls and help train staff in relation to our customer support and helpdesk function;
- d) Product and service improvement – to improve our product and services;
- e) Service analysis – to conduct research, statistical analysis and behavioural analysis. This may include providing aggregate statistical information relating to customers, sales, traffic patterns and related site information to reputable third parties.



4) in our legitimate interest* to protect against fraud and for legal processing and safer recruitment adherence:

a) Website improvement and fraud prevention – improve our websites, prevent or detect fraud or abuses of our websites and enable third parties to carry out technical, logistical or other functions on our behalf;

b) Security – carry out security checks when allowing you access to our services and to block fraudulent or suspected fraudulent activity.

5) in order to meet our legal obligations:

a) Taxation – ensure we meet our tax and other regulatory obligations.

b) Registration – ensure local jurisdiction regulations are complied with (where registration is necessary in such jurisdictions).

**** any reliance on legitimate interest shall not prejudice your interest or fundamental rights and freedoms.***

Marketing

We may periodically send promotional material to you about new services, special offers or other information which we think you may find interesting based on the profile we have created about you to the email addresses and phone numbers which you have provided.

Please note that we do not want to send you information that you do not want to receive, and you can opt out at any time (please see 'The right to ask us to stop contacting you with direct marketing' below for further information).

We will always ask your permission before sending you email marketing information. We do this by asking for your positive confirmation (e.g. by emailing us to OPT IN and or providing a tick or inserting your contact details in the relevant boxes) indicating that you wish to receive marketing, and you can opt out at any time (please see 'The right to ask us to stop contacting you with direct marketing' below for further information). This ensures you only receive information that you have given us permission to send and are willing to receive.

We may use your information to create a profile about you in order to tailor, by automated means, our communication and marketing to you. You can object to such profiling, please see 'The right to object to automated decision making/profiling' below).

From time to time, we may also use your information to contact you for research purposes and/or to ask about your experience using our services as part of a continual programme of customer service improvement. We may contact you by email, telephone, text, social media and/or mail. We may also use the information to customise the website according to your interests.

How long we will keep your personal information

We retain your information for a range of purposes which determine the period of time for which we need to keep such information. For example (list is not exclusive):



<i>Data</i>	<i>Retention Period</i>
Recorded telephone conversations	90 days from the day of call received
For the purposes of marketing	3 years from the point of last contact with you, this may include use of our websites or responses to communications with you
For compliance with legal obligations arising from contracts entered into with you, for example tax regulations, employment obligations	7 years for legal and financial retention compliance.

We will remove your data from our systems at the end of the applicable data retention periods, unless we are required by current or future law to retain your personal information for a longer period.

Our approach to information security

To protect your information, Arborvitae Care Services Ltd has policies and procedures in place to make sure that only authorised personnel can access the information, that information is handled and stored in a secure and sensible manner and all systems that can access the information have proportionate and reasonable security measures in place. To achieve this, employees, contractors, sub-contractors and third party suppliers have contracts, with defined roles and responsibilities.

While we take commercially reasonable measures to ensure the safety and security of your data, due to the inherent risks with the Internet, we are unable to warranty the absolute security of your data when using our services.

Who will have access to personal information about me?

Personal information can be accessed by a restricted number of Arborvitae Care Services Ltd employees, by certain companies with which Arborvitae Care Services Ltd may conduct joint programs, and by third parties with whom Arborvitae Care Services Ltd contracts to carry out business activities for Arborvitae Care Services Ltd. We train our employees about the importance of privacy and how to handle and manage customer data appropriately and securely. Also, it is Arborvitae Care Services Ltd's practice to seek your consent where required by applicable law if you are registering for a program which is conducted in conjunction with another company that may require access to your personal information. In addition, Arborvitae Care Services Ltd's practice is to require its contractors to keep your personal information confidential and to use your personal information only to perform functions for Arborvitae Care Services Ltd.

Does DBS share personal information with third parties?

Except as otherwise stated in this Section, Arborvitae Care Services Ltd will not transfer your personal information to third parties unless you have been provided with an opportunity to opt into this disclosure. Arborvitae Care Services Ltd may disclose your personal information without your



opt-in to third party service providers which assist us with our business activities. It is Arborvitae Care Services Ltd's practice to require such third-party service providers to keep your personal information confidential and to use your personal information only to perform functions for Arborvitae Care Services Ltd and in accordance with Arborvitae Care Services Ltd's instructions. Arborvitae Care Services Ltd further reserves the right to disclose your personal information to respond to authorised information requests from government authorities or when otherwise required by law.

How may I correct personal information or delete it from current customer records?

With your support Arborvitae Care Services Ltd will keep personal information accurate and up to date. You may request to remove, amend or correct your personal information. Please notify us of your wishes by contacting us in one of the ways specified herein.

Your rights

In order to process any of the requests listed below, we may need to verify your identity for your security. In such cases your response will be necessary for you to exercise this right.

1. The right to access information we hold about you

At any point you can contact us to request details concerning the information we hold about you, why we have that information, who has access to the information and where we got the information. In most cases you may be entitled to copies of the information we hold concerning you. Once we have received your request we will respond within 30 days.

2. The right to correct and update the information we hold about you

If the data we hold about you is out of date, incomplete or incorrect, you can inform us and we will ensure that it is updated.

3. The right to have your information erased

If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase the data we hold. When we receive your request, we will confirm whether the data has been deleted or tell you the reason why it cannot be deleted.

4. The right to object to processing of your data

You have the right to request that Arborvitae Care Services Ltd stops processing your data. Upon receiving the request, we will contact you to tell you if we are able to comply or if we have legitimate grounds to continue. If data is no longer processed, we may continue to hold your data to comply with your other rights.

5. The right to ask us to stop contacting you with direct marketing

You have the right to request that we stop contacting you with direct marketing. On promotional emails you simply need to respond to ask to OPT OUT/unsubscribe which will unsubscribe you from that service. You can also unsubscribe by updating your profile preference. If you wish to opt out with respect to more than one email address, you must complete a separate request for each email address.

Please note it is not possible to 'opt-out' of receiving communication from us which relates to your accounts or customer satisfaction surveys sent as part of the orders placed (which are not



considered marketing for these purposes). This ensures that we can always contact you as a result of circumstances that may affect your order and in order for us to improve our services going forward.

6. The right to data portability

You have the right to request that we transfer your data to another controller. Once we have received your request, we will comply where it is feasible to do so.

7. The right to object to automated decision making/profiling

You have the right to request that we stop profiling you in relation to our direct marketing practice. You can inform us and we will deal with your request accordingly.

8. The right to complain

You can make a complaint to us by contacting claire@arborvitaecare.co.uk or to the data protection supervisory authority – in the UK, this is the Information Commissioner's Office, at <https://ico.org.uk/>.

Consent

In those cases where we need your consent to process your information, we will ask you to make a positive indication (e.g. to tick a box or insert your contact details on the relevant form or web page requiring consent). By actively providing us with your consent, you are stating that you have been informed as to the type of personal information that will be processed, the reasons for such processing, how it will be used, for how long it will be kept, who else will have access to it and what your rights are as a data subject and that you have read and understood this privacy policy.

Sharing your information

The information and data we collect is important for Arborvitae Care Services Ltd and we understand that you care about the use and storage of your personal information, we value your trust in allowing us to do this. We would not want to share this with anyone else unless we have your express consent, we will never disclose, rent, trade or sell your personal information to any third parties for their marketing purposes.

We do disclose or transfer your data or personal information to other companies, data processors or agents employed by us to perform any necessary functions on our behalf (such as hosting and maintaining our website, providing us with data management systems, market research, customer satisfaction surveys and support services), but they are bound by similar terms to those set out in our privacy policy and may not use this information for their own purposes.

In the event that Arborvitae Care Services Ltd or any part of its business is sold to or integrated with another business, Arborvitae Care Services Ltd may disclose your personal information to the new owners (and their professional advisers on the transaction) to be used by the new owners and their group of companies in the same ways as set out in this privacy policy, including to continue providing you with the same services and marketing information services as are currently provided by Arborvitae Care Services Ltd.

Use of cookies

The Arborvitae Care Services Ltd website and mobile app use cookies and tags. A cookie is a small text file that can be stored by your browser on the device you use to access internet and allows the browser to pass small amounts of information about user behaviour on the given website to a web



server. Tags are pieces of code that exist on web pages and collect information about usage of the web pages.

At Arborvitae Care Services Ltd we use our own cookies and tags as well as those from third parties to enable the smooth operation of the websites, such as the use of the basket function or to automatically log you in when you visit (with your permission). We also use cookies/tags to monitor visits to our website and continuously look for places to improve your website experience. Our marketing partners also use cookies and tags to monitor the performance of our advertising and to serve appropriate Arborvitae Care Services Ltd advertisements to you on other websites. We will never share any personal information about you with these third parties and the cookies and tags used maintain your anonymity.

Cookie Consent

The first time you access Arborvitae Care Services Ltd website, you will be informed about our use of cookies to improve your site experience. By continuing to browse our website you consent to our use of cookies.

Description of cookies

Cookie Type	Example	Details
Analytics	Google Analytics	These cookies give us critical information about various pages on the websites and how our users interact with them. We use this information to improve the performance of our website and the information presented to users
Authentication	Arborvitae Care Services Ltd	When you create an account with Arborvitae Care Services Ltd, these cookies allow the website to remember you in order present you with information that is directly relevant to you.

How to reject and delete cookies

Should you wish to reject or block the use of cookies, you can do so at any time, usually by clicking 'Help' on your browser. Cookies are specific to individual browsers so if you use more than one browser, you will need to delete cookies on each browser. Please be aware though that by rejecting cookies you may not receive the optimum website experience.

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.

Contact details

If you have any queries about this policy, need further information or wish to lodge a complaint you can use the details below to contact us.

Data Protection Officer

Arborvitae Care Services Ltd
Oak House



Unit 246 Europa Boulevard
Westbrook

Changes to this Privacy Policy

We may change this policy from time to time. You should check this policy occasionally to ensure that you are aware of the most recent version that will apply each time you access the website.