Privacy Policy

PRN-101: PRIVACY POLICY
Company Name: AI Auto-Tech Ltd
Trading/Business Name: CAREHOPES
Company Registration Number: 15556946
SIC Code: 88100 – Social Work Activities Without Accommodation for the Elderly and Disabled
Email: admin@carehopes.com
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1. Introduction

CAREHOPES (TC) is committed to protecting the privacy, dignity, and rights of every client, sponsor, companion, volunteer, and stakeholder. This Privacy Policy explains how TC collects, uses, stores, shares, and safeguards personal information in accordance with:

- UK GDPR
- Data Protection Act 2018
- Equality Act 2010
- Social-care best-practice standards
- TC's internal governance and safeguarding framework

Our approach is rooted in compassion, respect, and transparency. We believe that privacy is not only a legal requirement — it is a core part of delivering safe, trustworthy companionship.

2. Scope of the Policy

This policy applies to:

- Service users receiving companionship
- Sponsors (individuals, families, organisations)
- Companions and volunteers
- Staff, contractors, and consultants
- Website users, app users, and digital platform users
- Referral partners, affiliates, and group members
- Stakeholders engaging with TC through any communication channel

It covers all personal data processed by TC, whether collected online, in person, by phone, or through third-party systems.

3. Types of Personal Data We Collect

TC collects only the information necessary to deliver safe, effective companionship services. This may include:

3.1. Client and Sponsor Information

- Full name, contact details, address
- Emergency contact details
- Health-related information relevant to companionship (risk factors, mobility needs, GP appointment schedules)
- Support preferences and companionship plans
- Contract details, payment history, membership status
- Notes from sessions, checklists, and service fulfilment records

3.2. Companion and Volunteer Information

- Identification and right-to-work documents
- DBS checks and safeguarding records
- Training records and competency assessments
- Work schedules, attendance logs, and performance documentation

3.3. Digital and Technical Information

- Website usage data
- Cookies and analytics
- IP address, device type, browser type
- Communication logs (emails, texts, calls)

3.4. Referral and Affiliate Information

- Referral codes
- Affiliate membership details
- Bonus eligibility records

TC does **not** collect unnecessary or excessive information.

4. How We Use Personal Data

We use personal data to:

4.1. Deliver Companionship Services

- Create and update companionship plans
- Schedule sessions, bookings, and rescheduling
- Support GP appointments and social activities
- Ensure safety, wellbeing, and appropriate matching with companions

4.2. Manage Contracts and Financial Obligations

- Process payments, memberships, and refunds
- Manage sponsor agreements
- Apply cancellation or rescheduling rules
- Maintain accurate financial records

4.3. Safeguarding and Quality Assurance

- Monitor service fulfilment through checklists
- Investigate incidents or concerns
- Ensure companions meet professional standards
- Maintain Definition of Done/Good/Fulfilled criteria

4.4. Communication and Stakeholder Engagement

- Provide updates, reminders, and service notifications
- Respond to enquiries through official TC channels
- Ensure companions do **not** negotiate contracts or discuss terms
- Support stakeholder engagement plans

4.5. Legal, Regulatory, and Governance Requirements

- Comply with UK GDPR and Data Protection Act
- Support audits, inspections, and board resolutions
- Maintain accurate records for compliance

TC never uses personal data for automated decision-making that affects client rights.

5. Lawful Basis for Processing

TC processes personal data under the following lawful bases:

- **Contractual necessity** (to deliver companionship services)
- **Legal obligation** (safeguarding, DBS, financial compliance)
- **Vital interests** (safety, emergency situations)
- **Consent** (marketing, optional communications)
- **Legitimate interests** (service improvement, stakeholder engagement)

Where consent is required, it is always:

- freely given
- specific
- informed
- revocable at any time

6. How We Store and Protect Personal Data

TC uses secure systems and procedures to protect personal data from:

- loss
- misuse
- unauthorised access
- disclosure
- alteration
- destruction

6.1. Security Measures

- Encrypted digital storage
- Access controls and role-based permissions
- Secure communication channels
- Regular audits and compliance checks
- Staff and companion training in data protection

6.2. Retention Periods

Data is retained only as long as necessary:

- Client records: up to 7 years after service completion
- Companion/volunteer records: up to 7 years after disengagement

- Financial records: 7 years (HMRC requirement)
- Incident reports: 10 years (safeguarding requirement)
- Referral records: 3 years

After retention periods expire, data is securely deleted.

7. Sharing Personal Data

TC shares personal data only when necessary and appropriate.

7.1. Internal Sharing

- Companions receive only the information required to deliver safe companionship
- Volunteers receive limited information based on role
- TC staff access data based on job function

7.2. External Sharing

We may share data with:

- Sponsors (individuals, families, organisations)
- Health professionals (GPs, social workers)
- Regulatory bodies (if legally required)
- Payment processors
- IT service providers
- Referral partners (limited data only)

TC never sells personal data.

8. International Transfers

TC operates within **England and Wales**. Data is stored and processed within the UK. If international transfers become necessary, TC will:

- use UK GDPR-compliant safeguards
- notify affected individuals
- ensure equivalent protection standards

9. Rights of Clients, Sponsors, Companions, and Stakeholders

Under UK GDPR, individuals have the right to:

- Access their personal data

- Request correction of inaccurate data
- Request deletion (where applicable)
- Request restriction of processing
- Object to certain processing
- Request data portability
- Withdraw consent

TC responds to all requests within **30 days**.

10. Children and Vulnerable Adults

TC provides companionship to vulnerable adults and individuals with additional needs. We apply enhanced privacy protections including:

- minimal data collection
- strict access controls
- safeguarding oversight
- sponsor-verified communication

Companions must never discuss contract terms with clients.

11. Communication Rules

All communication regarding:

- contracts
- payments
- cancellations
- rescheduling
- complaints
- service terms

must occur **through TC's official communication channels**, not through companions or volunteers.

This protects:

- client privacy
- companion boundaries
- contractual clarity

- safeguarding integrity

12. Data Breach Procedure

If a data breach occurs:

1. TC will assess the severity within 24 hours.
2. Affected individuals will be notified if risk is identified.
3. The ICO will be notified where legally required.
4. TC will implement corrective actions.

All breaches are documented and reviewed by TC's governance team.

13. Updates to This Policy

TC may update this Privacy Policy to reflect:

- legal changes
- operational improvements
- new services
- governance decisions

All updates will be communicated through official TC channels.