



## **Hestian Group Privacy Policy** (Privacy Policy for Hestian Group's Carer card service)

Our service for you comes with a Privacy Policy, to cover the 'who, what and why' we collect and process your personal data, as required for the Carer card to work properly on your behalf. This is printed and provided in your Housebook and is also available online at [www.Carer card.com](http://www.Carer card.com)

### **Who are we?**

We are Hestian Group ("we", "our", "us") and providers of the Carer card service. We operate here under the name of "Hestian". We are committed to protecting and respecting your privacy. If you have any questions about your personal information please discuss it with us by either:

- emailing our Data Protection Officer [DPO@Carer card.com](mailto:DPO@Carer card.com), or
- writing to us at DPO, Hestian Group Ltd, 3, The Quadrant, Coventry, CV1 2DY.

We have a Data Protection Registration with the Information Commissioner's Office under our registration reference number ZA528361. We are also required to ensure that Hestian and our card issuing third party provider Prepaid Financial Services Limited can show legitimate interests in collecting and using the personal data set out below:

The Carer card Prepaid Mastercard is issued for Hestian by Prepaid Financial Services Limited (PFS) pursuant to a license from Mastercard International Incorporated. PFS is authorised by the Financial Conduct Authority under the Electronic Money Regulations 2011, firm reference number 900036, for the issuance of electronic money and provision of payment services. PFS is included with Hestian in our service for you and represented in our Hestian Privacy Policy also, as "we", "our", and "us".

## What information we hold about you

You have a right to know what we do with the personal information you and others make available to us, why we collect it and what it means for you. This Privacy Policy describes the Hestian approach to Data Privacy to meet our obligations under the EU General Data Protection Regulation (GDPR) 2018, as implemented on the 25th of May 2018. We will collect personal data about the carer who will use the Carercard, about you as the account holder, and about any other person appointed to use the account on your behalf (i.e. a family member or appointed lasting power of attorney).

Information and personal data are submitted by individuals through our application system or website, for example, when you sign up to use the Carercard and provide details such as your name, ID, and address, which are needed by PFS to confirm your identity.

**Types:** The personal data we would like to collect from you, your carer and/or appointed representative, for the Carercard service to work, includes:

- Your contact information:
  - First Name and Surname (with any title);
  - Date of birth;
  - Address where live-in care is provided;
  - Telephone number;
  - Mobile number, if used;
  - Email address, if used;
  - Proof of identity and proof of address as part of our 'Know Your Customer' regulatory requirements, i.e. passport and driving licence.
- Your ID and card verification information:
  - ID documents;
  - Personal information such as telephone messages left or recordings for quality purpose;
  - Security questions, and your user ID;
  - Bank account details for card funding;
  - Transaction information, as a form of receipt collection from card spending;
  - Cookie information for our website (read our cookie policy for more information on what cookies are and how we use them).

The above types of information are collected both during the application stage and during the use of the Carercard service, and are covered by this privacy policy with your consent. Why the information is needed is to enable us to provide the Carercard for the secure and efficient handling of your housekeeping money. We also have obligations and purposes, below, associated with the provision of a money handling service.

**Purposes:** The personal data collected will be used for the following purposes for the Carercard to work:

- To verify your identity and keep your contact information up to date;
- To contact you regarding our service to you and to market products and services generally;
- To comply with our legal obligations for the prevention of fraud, money laundering, terrorist financing or misuse of the services;
- and, if and where requested by law enforcement for investigation of crime.
- To meet our contractual obligations, including the provision of a Carercard prepaid card, e-wallet and/or IBAN account to you;
- To process your account information;
- To allow your agency provider carer(s) and Hestian to ensure your funds are made available as intended for your housekeeping, for you.

## Your Consent

Our legal basis for the processing of your personal data are: receipt of your consent, performance of a contract where you are a party, legal obligations that we are required to fulfil, and compliance with national law and any legitimate interests pursued by us or any third parties we use, including the prevention of fraud, money laundering, counter terrorist financing or misuse of services. By consenting to this privacy policy and proceeding with the terms of our Carercard service you are giving us permission to process your personal data and process your funds within your Carercard set where needed, specifically for the purposes identified above. Consent is required for Hestian and PFS to process personal data and funds, but it must be explicitly given. If or where PFS asks you for sensitive personal data, PFS will always tell you why and how the information will be used.

## Withdrawal of Consent Conditions

Please note, where you have consented to your data being used for carrying out financial transactions, then the right to withdraw consent does not exist, for this category of service. As a payment service provider, PFS is obliged to retain data concerning financial transactions for 6 years in accordance with national law for the purpose of preventing, detecting and investigating, possible money laundering or terrorist financing. You may withdraw your consent from Hestian direct marketing at any time by contacting our Data Protection Officer, [DPO@Carercard.com](mailto:DPO@Carercard.com)

## Who we share it with?

### (Third-Party Disclosures and International Data Transfers)

In the limited situations where we (Hestian and/or PFS) store or transfer personal information outside the European Economic Area (EEA), we require your personal information to be protected to data protection standards and we ensure that there are adequate safeguards in place for data protection. The GDPR prohibits transfers of personal data outside the EEA to a third country that does not have adequate data protection. Where transfer occurs outside the EEA the following mechanisms are in place with the third parties:

- ✓ Data Protection clauses in our contracts and agreements with third-parties
- ✓ EU-US Privacy Shield
- ✓ Personal Information Protection and Electronic Documents Act (PIPEDA)

## How long we keep it

PFS will process personal data for the duration of the contract for services and will store the personal data for 6 years after that date of termination of the contract.

## Your Rights as a Data Subject

At any point while we are in possession of or processing your personal data, you as 'the data subject' for our service have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you; you will find a copy of the Subject Access Request Form we use at [www.Carercard.com](http://www.Carercard.com)
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete;
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records. Your data relating to financial transactions, accounts or cards cannot be deleted due to national law associated with the prevention of fraud, money laundering, counter terrorist financing or misuse of services for crime;
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing;
- Right of portability – you have the right to have the data we hold about you transferred to another organisation;
- Right to object – you have the right to object to certain types of processing such as direct marketing;

- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling;
- Right to judicial review, in the event that Hestian or PFS should refuse your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined below.

All of the above requests related to your rights when received by us will be forwarded on should there be a third party involved in the processing of your personal data.

## **Complaints**

In the event that you wish to make a complaint about how your personal data is being processed by Hestian (or third parties as above), or how your complaint has been handled, you have the right to lodge a complaint directly our Data Protection Officer [DPO@Carercard.com](mailto:DPO@Carercard.com) and we'll do our best to fix the problem. If you are still not satisfied, you can refer a complaint to the Financial Ombudsman Service. For details, visit their website [www.financial-ombudsman.org.uk](http://www.financial-ombudsman.org.uk)