

Livity Life Ltd

Privacy Notice

Version number	V3.0	Type of document	Privacy Notice
Audience	All employees of Livity Life Ltd		
Approved by	Deb Kowles	Issue Date	06/03/2026
Policy Author and Contact Details	Governance Director Deb.knowles@livitylife.co.uk		
Department	Governance		
Consultation	Exec Board		
Review Period	Annually	Review Due Date	05/03/2027
Description	This Notice outlines how we collect, use, share and protect data.		
Related legislation, guidance and internal procedures	UK Data Protection Laws: <ul style="list-style-type: none"> - UK GDPR - Data Protection Act 2018 		
Internal Distribution	All Livity Life employees		
External Distribution	On request and via the Livity Life website		
Availability	Public		

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1. Purpose

- 1.1. This Notice covers how we look after and handle your Personal Data when you are a user of one or more of our Assistive Technology services.

2. Who We Are

- 2.1. Livity Life Limited whose registered office is at Nutsey Lane, Calmore Industrial Estate, Totton, Southampton, Hampshire, SO40 3XJ. Livity Life is the controller of your Personal Data and is responsible for keeping it safe (collectively referred to as "Livity Life", "we", "us" or "our" in this privacy policy).
- 2.2. We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise rights, please email: dpo@livitylife.co.uk
- 2.3. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). It's our priority to ensure you are satisfied with our data processing practices. If you do find you have a complaint, we would appreciate the chance to try and resolve any issues you have before you approach the ICO.

3. Changes to The Privacy Policy and Your Duty to Inform us of Changes

- 3.1. We keep this Notice under regular review. It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes during your relationship with us.

4. Personal Data We Collect About You

- 4.1. Depending on how you interact with us (online, over the phone, email, etc) and whether you are an end user of our service, we collect various types of data from you which we have grouped together as follows:
 - 4.1.1. Basic details such as your name, address, date of birth, contact number(s), and email address (where you have provided it);
 - 4.1.2. Your next of kin and their contact details;
 - 4.1.3. Notes and reports about your physical health and any care or support you need and receive;
 - 4.1.4. Relevant information and reports from other professionals, relatives or those who care for you or know you well;
 - 4.1.5. Telephone records and recordings of inbound and outbound calls;
 - 4.1.6. Any in-person contact you have with us such as home visits or clinic appointments; and
 - 4.1.7. Service user experience feedback and treatment outcome information you provide.

5. How We Collect Your Personal Data

5.1. We receive your personal data both directly from you and other sources as follows:

- 5.1.1. When you are referred to one of our services by a prescriber such as your GP or a healthcare clinician or a social worker from your local authority.
- 5.1.2. When we become the new service provider of a contract with the NHS or the local authority in your area.
- 5.1.3. When we contact you to organise an appointment or visit.
- 5.1.4. When we assess your needs for one of our services.

6. How We Use Your Personal Data

6.1. We process your Personal Data for the following purposes:

- 6.1.1. To assess and to make decisions with you about the services and equipment you receive.
- 6.1.2. To record any contact we've had with you as well as details of the service and equipment we've provided to you.
- 6.1.3. To assess quality assurance and the outcomes of the services we've provided to you.
- 6.1.4. To verify who you are, understand your query and send updates to you when you use our SMS, email or telephone service.
- 6.1.5. To investigate any concerns or complaints made about the services which you have received.

6.2. We rely on the following lawful basis to process your data in the following contexts:

- 6.2.1. When we become the new service provider in your area or when we receive a referral from a prescriber, we rely on the lawful basis of contract with the NHS or your local authority to process your data.
- 6.2.2. We rely on the lawful basis of health and social care to process any of your health data as a contract provider for the NHS or your local authority.
- 6.2.3. We rely on our legitimate interests to respond to and message you via SMS, email or telephone. You can object to any of the methods of communication previously mentioned, by emailing us at dpo@livitylife.co.uk or by informing one of our staff at your service centre.

7. Disclosures of Your Personal Data

7.1. We only share your necessary Personal Data with the providers below to deliver our services.

7.2. All providers, and their selected staff, are only allowed to access and use relevant Personal Data on our behalf for specific tasks based on our instructions. They are required to keep your Personal Data confidential and secure at all times.

7.3. Services Providers:

7.3.1. These are external companies that we use to help us provide our day-to-day service such as IT software providers, website operation and hosting providers, or building contractors.

7.4. Professional Service Advisers:

7.4.1. These are professional service advisers who help us meet our legal and regulatory compliance requirements which includes auditors (financial and cyber security), legal practitioners, banks and insurers.

7.5. NHS and Local Authorities:

7.5.1. We receive and share your data, where necessary, with your prescriber for your healthcare needs.

7.5.2. We also work collaboratively with NHS partners, local authority agencies and social services. We would, therefore, like to share some of your data with other professionals and services who support your care, but this will only take place with your consent. You have the right to refuse and withdraw your consent to this sharing of information at any time. You can do this by speaking with your relevant service centre or by emailing us at dpo@livitylife.co.uk. Please be aware, withdrawing consent may impact other services you receive from the NHS or your local authority. We will inform you of possible impacts to your service at the time of your request.

8. International Transfers

8.1. We do not transfer any of your data outside of the UK. All service user data is stored securely on our private cloud storage hosted in the UK.

9. Data Security

9.1. Our security measures are in-line with NHS Digital and Government standards, and we are certified by the Cyber Essentials accreditation scheme. In addition, we limit access to your Personal Data to those employees, contractors and other third parties on a need-to-know basis only. They will only process your Personal Data on our instructions and they are also subject to a duty of confidentiality.

10. Data Retention

10.1. We retain your Personal Data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your Personal Data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

10.2. Our retention periods are maintained in-line with the NHS Records Management Code of Practice 2021 and any applicable legal, regulatory, tax, accounting or other

statutory requirements we are required to meet.

11. Your Legal Rights

11.1. Under certain circumstances, you have the following rights in relation to your Personal Data:

- 11.1.1. Request access to your Personal Data (commonly known as a "data subject access request"). This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.
- 11.1.2. Request correction of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- 11.1.3. Request erasure of your Personal Data. This enables you to ask us to delete or re-move Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your Personal Data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- 11.1.4. **Object to processing** of your Personal Data where we are relying on legitimate interests (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- 11.1.5. **Request restriction of processing** of your Personal Data. This enables you to ask us to suspend the processing of your Personal Data in the following scenarios:
 - 11.1.5.1. If you want us to establish the data's accuracy.
 - 11.1.5.2. Where our use of the data is unlawful but you do not want us to erase it.
 - 11.1.5.3. Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - 11.1.5.4. You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- 11.1.6. **Request the transfer** of your Personal Data to you or to a third party. We will provide to you, or a third party you have chosen, your Personal Data

in a structured, commonly used, machine-readable format. Note that this right only applies to auto-mated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

11.1.7. **Withdraw consent at any time** where we are relying on consent to process your Personal Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide you our services and may need to end the contract between us. We will advise you if this is the case at the time you withdraw your consent.

11.1.8. If you wish to exercise any of the rights set out above, please contact us at: dpo@livitylife.co.uk

11.2.No Fee Usually Required:

11.2.1. You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

11.3.What We May Need From You:

11.3.1. We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

11.4.Time Limit to Respond:

11.4.1. We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

12. Complaints

12.1. The complaints team are available to assist you with any comments, concerns and complaints. The team act independently of any of the services we provide ensuring your concerns are thoroughly investigated and responded to in a timely manner. If you wish to make a complaint or provide feedback, please contact us at: contactus@livitylife.co.uk

Governance Officer

Livity Life Limited
Nutsey Lane
Calmore Hampshire
SO40 3XJ

12.2. You can also get further information and advice or report a concern to the UK's independent authority, the Information Commissioner, via the contact details below:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Web: <http://www.ico.org.uk>

Tel. 0303 123 1113

Appendix A: List of Sub Policies

Group Sub Policy Ref	Group Sub Policy Name	Owner
N/A	N/A	N/A

Appendix B: Definitions

In addition to the Word Document “Group Policy Definitions.doc” which includes the definitions inherited by this Policy from the Group Policy ‘Governance and Policy Management’, the following definitions apply to this Policy:

Term	Definition
N/A	N/A

Appendix C: Revision History

Version Number	Reason for Change	Description of Change	Date of Change	Author
V3.0	Full Policy Review	Email addresses updated New Livity template applied	06/03/2026	D.Knowles