

# Coraledge Ltd (Thingitude) Data Management Policy

Version 1.0

Last updated 19 August 2019

## Data Protection Officer

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## Personal data that we hold and how we get it

### Falls Prevention System trial

For each user of the Falls Prevention System trial, we hold:

- User's name, address, phone number and email - so we know where our systems are installed and we can contact the user for feedback, and provide updates and support.

We will have got your contact information during our search for suitable candidates for the trial. It will have been provided either by yourself, or with your permission by the West Berks falls team or your housing association.

We collect data from sensors installed in a user's home that indicate changes in some of the factors that increase the likelihood of a fall, namely environment conditions, dehydration levels, and sedentary behaviour. The sensors transmit data to us around the clock using the Smart Berkshire wireless network. Against each user account we will collect the following data for the duration of the trial:

- Room temperature, humidity and light
- Status of the front door - whenever it opens or closes
- Motion detection near the front door
- When the toilet has been flushed
- From IoT Stars' system - whether the bed is occupied or empty at night time
- From Tendertec's system - activity indicator that the user is drinking
- From Tendertec's system - activity indicator that the user has been inactive for a period

## How we use your data

We use your name and address so we can contact you for feedback on the falls prevention system and provide support and maintenance. It also means we know where our equipment is installed.

We collect and process the data identified above so that we can spot changes in your behaviour that might increase your chances of falling. To that end we will use the data collected to inform you:

- If the temperature in your room is too hot or too cold and should be adjusted
- If we think you might be dehydrated and should drink something
- If you have become inactive and should stretch your legs

During the course of the trial we may explore different ways to inform you - such as a text message on your phone, or a “drink water” sign that lights on your mantelpiece.

## Sharing your personal data with other organisations

We will share your personal data with the following organisations and for the following reasons:

- West Berkshire Council, who have commissioned the trial and are keen to understand whether the Falls Prevention System has been beneficial.
- West Berkshire Council’s Telecare service provider - who would like to be alerted if the Falls Prevention System identifies that you have fallen.
- Sovereign Housing Association careline team, only if you are a resident in one of Sovereign Housing Association’s properties. They would like to be alerted if the Falls Prevention System identifies that you have fallen.
- Tendertec Ltd, one of the three partners in the trial - they use the data to help identify patterns of behaviour so they can provide richer information to your care professionals.

We will not share your data for any other reason or with any other organisation.

We will not sell your data to any organisation.

## How do we keep your data secure?

Your data will be stored on our database, which runs on a server hosted in an AWS datacentre located within the UK.

The database is protected by a username and password, which is only known to the Data Protection Officer.

Your name, address, phone number and email will only be stored on the database in encrypted form. The encryption keys are held in a secure store, accessible only to the Data Protection Officer.

All data sent from our sensors in your home will be transmitted in encrypted form across the Smart Berkshire network to our server, where it will be decrypted and stored in the database.

The encryption keys are held in a password protected account on the Smart Berkshire network. The password for that account is known only to the Data Protection Officer and the Coraledge staff responsible for configuring the sensors.

## How long we keep your data

With your consent we will keep your data for the duration of the trial and 3 months afterwards so we can complete our learning from the trial.

If you become a customer after the trial then we will keep your data for as long as you remain a customer, plus 1 year in case you change your mind or need to see your data. Sensor data will be retained for a maximum of 5 years, after which it will be deleted.

## If you want to access your data or instruct us to delete your data

You are entitled to know and see the data we hold about you. We will be happy to provide it to you upon request. Please contact the Data Protection Officer with your request. Please note that you are required to provide proof of identification and address.

Upon request we can provide a copy of the data we hold about you for you to keep, forward or transfer to another service provider. Data will be provided electronically in a password protected file using a common (non-proprietary) format. Please contact the Data Protection Officer with your request. Please note that you are required to provide proof of identification and address.

If you no longer want us to hold data about you, we will delete those that we do not require for administrative or statutory purposes. Before deleting your data we can, upon request provide a digital copy that you may keep or transfer to another service provider. Please contact the Data Protection Officer with your request. Please note that you are required to provide proof of identification and address. We will contact you one last time in writing (letter or email) to confirm that your data has been deleted.