

Review Sheet



Last
Reviewed
07/07/2026

Last
Amended
07/07/2026

This policy will be reviewed as needs require or at the following interval: Annual



Business Impact:



Changes are important, but urgent implementation is not required, incorporate into your existing workflow.

Reason for this Review:

Website now live

Changes Made:

Yes

Summary:

This Website Privacy and Cookies Policy and Procedure continues to provide guidance and support on the measures and requirements in place around the external privacy policy of Waterlily Kettering Ltd. It has been reviewed in line with the Data (Use and Access) Act 2025, and has been updated to cover the new complaints process controllers must implement and communicate to data subjects. A new Template Data Processing Complaints Policy has also been added to the Forms section.

Relevant Legislation:

- Data Protection Act 2018
- UK GDPR
- The Privacy and Electronic Communications (EC Directive) Regulations 2003

Underpinning Knowledge:

- Author: Information Commissioner's Office, (2018), Cookies and Similar Technologies [Online] Available from: <https://ico.org.uk/for-organisations/direct-marketing-and-privacy-and-electronic-communications/guide-to-pecr/cookies-and-similar-technologies/> [Accessed: 02/04/2026]
- Author: Information Commissioner's Office, (2021), UK GDPR Guidance and Resources [Online] Available from: <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/> [Accessed: 02/04/2026]

Suggested Action:

- Encourage sharing the policy through the use of the QCS App
- Share 'Key Facts' with relevant staff

Equality Impact Assessment:

QCS have undertaken an equality analysis during the review of this policy. This statement is a written record that demonstrates that we have shown due regard to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations with respect to the characteristics protected by equality law.

1. Purpose

- 1.1** To provide a template Website Privacy Policy that Waterlily Kettering Ltd can adapt to use on their website.
- 1.2** By using the template Website Privacy Policy provided, Waterlily Kettering Ltd will ensure that the policy on their website is UK GDPR compliant.
- 1.3**

Key Question

Quality Statements

WELL-LED

QSW5: Governance, management and sustainability

- 1.4** Relevant Legislation
- Data Protection Act 2018
 - UK GDPR
 - The Privacy and Electronic Communications (EC Directive) Regulations 2003

2. Scope

- 2.1** Roles Affected:
- All Staff
- 2.2** People Affected:
- Residents
 - Website Users
- 2.3** Stakeholders Affected:
- Family
 - Advocates
 - Representatives
 - Commissioners
 - External health professionals
 - Local Authority
 - NHS

3. Objectives

- 3.1** To provide assurance that Waterlily Kettering Ltd has a Website Privacy Policy in place for users of its website that is UK GDPR compliant.
- 3.2** To establish ways of working in terms of the use, storage, retention and security of personal data.
- 3.3** To ensure that all data subjects, including Residents, understand the ways in which their personal data is collected and processed by Waterlily Kettering Ltd via its website. Waterlily Kettering Ltd acknowledges that it may require additional privacy policies in relation to data subjects other than website users and understands that template external and employee privacy policies have also been provided.

4. Policy

- 4.1** Waterlily Kettering Ltd understands that if it operates a website, it needs to ensure its Website Privacy Policy complies with UK GDPR. Waterlily Kettering Ltd will use the Website Privacy Policy template as a template for its updated version.

Waterlily Kettering Ltd understands that the Website Privacy Policy only needs to be uploaded to its website if personal data is collected via the website.

Waterlily Kettering Ltd will consider using the Website Privacy Policy template to inform all website users about how their personal data is processed. Waterlily Kettering Ltd may wish to consolidate this Website Privacy Policy with the Template Privacy Policy - External that has also been provided.

- 4.2** Waterlily Kettering Ltd understands that the Website Privacy Policy template can be found in the UK GDPR suite within QCS Compliance Centre.

5. Procedure

- 5.1** Waterlily Kettering Ltd has considered the personal data it collects via its website (for example, via enquiry forms, requests to be sent newsletters, requests for provision of services) and we have a Website Privacy Policy. Waterlily Kettering Ltd acknowledges that the use of cookies may constitute processing of personal data via the website. We do not use cookies.
- 5.2** Waterlily Kettering Ltd has adapted the Website Privacy Policy before uploading it to its website to ensure that all aspects of the Website Privacy Policy are relevant and reflect the ways in which Waterlily Kettering Ltd processes personal data collected via its website.
- 5.3** Waterlily Kettering Ltd will use Template Privacy Policy - External and Template Privacy Policy - Employees to inform all other data subjects, including Residents, about how Waterlily Kettering Ltd processes personal data other than personal data collected via the website.
- 5.4** Waterlily Kettering Ltd understands that it must implement appropriate processes to ensure that it can respond to any complaints from a data subject with regards to Waterlily Kettering Ltd processing its personal data. Such processes must allow for all complaints to be acknowledged within 30 days of receipt, and investigations to take place without undue delay.

Waterlily Kettering Ltd will provide data subjects with a form detailing its complaints process. A template can be found in the Forms section of this policy.

6. Definitions

6.1 Data Subject

- The identified or identifiable individual about whom Waterlily Kettering Ltd has collected personal data

6.2 Data Protection Act 2018

- The Data Protection Act 2018 is a United Kingdom Act of Parliament that updates data protection laws in the UK. It sits alongside the UK General Data Protection Regulation and implements the EU's Law Enforcement Directive

6.3 UK GDPR

- The UK GDPR is the retained EU law version of GDPR that forms part of English law
- **General Data Protection Regulation (GDPR)** (EU) 2016/679 is a regulation in EU law on data protection and privacy for all individuals within the European Union

6.4 Personal Data

- Any information about a living person from which that person can be identified directly or indirectly including but not limited to names, email addresses, postal addresses, job roles, photographs, CCTV, online identifiers and special categories of data as defined in section 6.7

6.5 Process or Processing

- Doing anything with personal data, including but not limited to collecting, storing, holding, using, amending or transferring it. Waterlily Kettering Ltd does not need to be doing anything actively with personal data - at the point Waterlily Kettering Ltd collects it, it is processing it

6.6 Special Categories of Data

- A term for personal data that is sensitive and personal in nature. Special categories of data include but are not limited to medical and health records (including information collected as a result of providing health care services), Care Plans, generic and biometric data and information about a person's religious beliefs, ethnic origin and race, sexual orientation, trade union membership and political views

6.7 Cookies

- Cookies are small text files sent from a website and stored on a user's computer, either temporarily or permanently. They are designed to hold a modest amount of data specific to a particular client so that a website can identify the user and can be used in a number of ways such as to analyse traffic to a website, support users logging in or track users' browser activity

6.8 ICO

- The Information Commissioner's Office

7. Key Facts - Professionals

Professionals providing this service should be aware of the following:

- The Website Privacy Policy applies to personal data collected via the website of Waterlily Kettering Ltd

8. Key Facts - People Affected by The Service

People affected by this service should be aware of the following:

- Personal data provided to Waterlily Kettering Ltd via its website will be processed in accordance with the Website Privacy Policy at Waterlily Kettering Ltd

Further Reading

BBC - What do I need to know about cookies?

<https://www.bbc.co.uk/usingthebbc/cookies/what-do-i-need-to-know-about-cookies/#:~:text=Cookies%20are%20small%20text%20files,We%20use%20them%20to%3A&text=To%20deliver%20advertising%20to%20websites,remembering%20your%20preferences%20and%20settings.>

Outstanding Practice

To be "outstanding" in this policy area you could provide evidence that:

- Waterlily Kettering Ltd has reviewed and confirmed we do not use cookies. legislative requirements
- Waterlily Kettering Ltd ensures that the Website Privacy Policy is supplemented by additional privacy policies on the basis of the Template Privacy Policy - External and the Template Privacy Policy – Employees
- Waterlily Kettering Ltd ensures that clear links are available to the privacy policy on its website and that, if a person inputs personal data into the website, they are directed to the policy and required to accept its terms
- Waterlily Kettering Ltd has modified the template Website Privacy Policy to ensure that it includes all information relevant to the collection of personal data via its website and has uploaded a copy to its website
- The wide understanding of the policy is enabled by proactive use of the QCS App

Forms

The following forms are included as part of this policy:

Title of form	When would the form be used?	Created by
Cookies Example Policy Statement - GDPR08	When Waterlily Kettering Ltd has no information on the use of cookies on its website (a "Cookie Policy"). It can be used with the Website Privacy Statement.	QCS
Website Privacy Policy Statement - GDPR08	To be used on a website if the website processes personal data.	QCS

Pop Up Cookie Banner	To seek consent to the use of cookies where cookies other than strictly necessary cookies are used on a website	QCS
Template Data Processing Complaints Policy	To provide data subjects with a form detailing the complaints process.	QCS

Cookies Policy Statement - GDPR08

COOKIES WEBSITE STATEMENT

Site audited: waterlilycare.com sets no cookies at all, including the embedded referral form.

No banner or opt-outs are legally required. If analytics or tracking is ever added in future, Waterlily Kettering Ltd will use a compliant consent banner live before it goes in.

Website Privacy Policy Statement - GDPR08

We are Waterlily Kettering Ltd, incorporated in England, company number 15950739.

Registered address is
10 Ebony Crescent
Barnet EN4
8FF

We are committed to ensuring that your privacy is protected. We comply with the Data Protection Act 2018 and the UK GDPR together with any other relevant data protection and privacy legislation (together “**Data Protection Legislation**”). We are the data controller of data you pass to us pursuant to this policy. Our Privacy Officer can be contacted at juliekerry@waterlilycare.com

This Privacy Policy [together with our website terms and conditions and cookie policy] sets out how we collect personal information from you and how the personal information you provide will be processed by us. By visiting the website at www.waterlilycare.com you are accepting and consenting to the practices described in this Privacy Policy. If you do not consent, please do not submit any personal data to us.

What information does Waterlily Kettering Ltd hold and how will we use it?

Information you give Waterlily Kettering Ltd: You may give us information about you by completing enquiry forms on the website or by requesting via the website that we send you marketing information. The information you give us may include your name, email address, address/location and phone number.

We will retain this information while we are corresponding with you or providing services to you or to the Resident you represent. We will retain this information for a maximum of 18 months.

Information Waterlily Kettering Ltd collects about you: Waterlily Kettering Ltd may collect the following information from you when you visit the website:

- Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
- Information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from the website (including date and time), products you viewed or searched for, page response times, website errors, length of visits to certain pages, page interaction information, methods used to browse away from the page and any phone number used to call our helpline

We retain this information for a maximum of 18 months.

Information we receive from other sources: This includes information we receive about you when you use other websites operated by us or other services we provide. This information may include your name, email address, postal address and phone number. We will retain this information for a maximum of 18 months.

Use Made of the Information

We may use the information we receive and/or collect about you via the website to:

- Fulfil our obligations under any contract that we have entered into with you or with the Resident that you represent, and to provide you or the relevant Resident with information or services that you or the Resident has requested
- Send you newsletters and marketing information if you have consented to us doing so
- Notify you of products and services that we feel may interest you, or permit third parties to do so if you have provided the appropriate consent
- Monitor website usage and provide statistics to third parties for the purposes of improving and developing the website and the services we provide via the website

Waterlily Kettering Ltd processes personal information for certain legitimate business purposes, which include some or all the following:

- Where the processing enables Waterlily Kettering Ltd to enhance, modify, personalise or otherwise improve the website, its services or communications
- To identify and prevent fraud
- To enhance the security of the network and information systems of Waterlily Kettering Ltd
- To better understand how people interact with the websites of Waterlily Kettering Ltd
- To administer the website and carry out data analysis, troubleshooting and testing; and

- To determine the effectiveness of promotional campaigns and advertising

If we obtain consent from you to do so, we may provide your personal details to third parties so that they can contact you directly in respect of services in which you may be interested.

Where we are processing personal data that we have obtained via the website on the basis of having obtained consent from you, you have the right to withdraw your consent to the processing of your personal data at any time. If you would like to withdraw your consent or prefer not to receive any of the above-mentioned information (or if you only want to receive certain information from us), please let us know by contacting us via the following webpage [WaterlilyCare - Delivering exceptional healthcare services](#).

Please bear in mind that if you object, this may affect our ability to carry out the tasks above for your benefit.

If you wish to have your information removed from our database or if you do not want us to contact you for marketing purposes, please let us know by clicking the 'Unsubscribe' option in any email we send to you and providing the details requested or by contacting us via the following webpage [*insert webpage link*] and we will take steps to ensure that this information is deleted as soon as reasonably practicable.

We will not share, sell or distribute any of the information you provide to us (other than as set out in this policy) without your prior consent, unless required to do so by law.

Third Party Sites

Our website may contain links to third party websites, including websites via which you are able to purchase products and services. They are provided for your convenience only and we do not check, endorse, approve or agree with such third-party websites nor the products and/or services offered and sold on them. We have no responsibility for the content, product and/or services of the linked websites. Please ensure that you review all terms and conditions of website use and the Privacy Policy of any such third-party websites before use and before you submit any personal data to those websites.

How Safe is your Information?

Where we have given you (or where you have chosen) a password which enables you to access certain parts of the website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Protecting your security and privacy is important to us and we make every effort to secure your information and maintain your confidentiality in accordance with the terms of the data protection legislation. The website is protected by various levels of security technology, which are designed to protect your information from any unauthorised or unlawful access, processing, accidental loss, destruction and damage.

We will do our best to protect your personal data but the transmission of information via the Internet is not completely secure. Any such transmission is, therefore, at your own risk.

Disclosure of your Information

We may share your personal information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the Companies Act 2006. We may share your information with selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter with them or you
- Third parties who may wish to contact you in respect of services or products they offer or sell which may be of interest to you, provided we receive your consent to such disclosure, and/or advertisers and advertising networks that require the data to select and serve relevant adverts to you and analytics and search engine providers that assist us in the improvement and optimisation of the website

Please note, we may need to disclose your personal information where we:

- Sell any or all of our business or assets or we buy another business or assets in which case we may disclose your personal data to the prospective buyer or seller
- Are under a legal duty to comply with any legal obligation or to enforce or apply our terms and conditions; or
- Need to disclose it to protect our rights, property or the safety of our customers or others, including the exchange of information with other companies, organisations and/or governmental bodies for the purposes of fraud protection and credit risk reduction

Where we Store your Personal Data

The data that we collect from you may be transferred to, and stored at a destination outside the European Economic Area ("EEA") this is because hubspot is hosted on a server outside the EEA, HubSpot data is hosted in the US under their GDPR agreement with UK-approved transfer safeguards. By submitting your personal data, you agree to this transfer, storing or processing. Waterlily Kettering Ltd will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this applicable data protection and privacy legislation. If a finding of adequacy has not been made in respect of the country to which the data is transferred, we will only transfer it where there are appropriate safeguards in place.

Your Rights in Respect of your Data

You benefit from a number of rights in respect of the personal data we process about you. We have summarised your rights below and more information is available from the Information Commissioner's Office website. Your rights apply for the period in which we process your data. There are certain caveats and exemptions to those rights which mean that in some circumstances you may not be entitled to exercise them. If we believe that is the case upon receipt of a request from you, we will let you know.

1. Access to your data
2. Rectification of your data
3. Right to be forgotten
4. Right to restrict processing
5. Data portability
6. Right to object

Automated decision making

Automated decision-making means making a decision solely by automated means without any human involvement. We do not carry out any automated decision making using your personal data.

Your right to complain about our processing

If you have any complaints about our use of your personal data, please contact us. You also have the right to complain to the relevant supervisory authority in your jurisdiction. In the UK, the supervisory authority is the Information Commissioner's Office. Contact details for the ICO can be found at <https://ico.org.uk/>.

If you have any further queries or comments on our Privacy Policy, please contact us via the following webpage or you can contact [WaterlilyCare - Delivering exceptional healthcare services](#) us by emailing juliekerry@waterlilycare.com

Template Data Processing Complaints Policy

1. Purpose

This policy explains how Waterlily Kettering Ltd handles complaints about the way we use your personal data. It applies to anyone whose personal data we process.

2. When You Can Complain

You can complain to us if you believe we have breached our obligations under the applicable data protection legislation in respect of how we have handled or processed your personal data. This includes, but is not limited to, situations where you think we have:

- Processed your data without a valid reason
- Shared your data with others without authority
- Kept your data for longer than necessary
- Failed to keep your data accurate
- Not responded properly to a request to exercise your data rights
- Failed to keep your data secure; or
- Used automated decision-making in a way that has significantly affected you without proper safeguards

3. How to Complain

Please contact our Data Protection Officer (DPO) using any of the methods below:

Method	Details
Email	
Post	
Telephone	

When submitting your complaint, please include:

- Your name and contact details
- A description of your complaint and
- Any relevant dates or reference numbers

4. What Happens Next?

Stage	Timeframe
We acknowledge your complaint	Within 14 days
We investigate and respond in full	Without undue delay and in any case within 30 days.
If the matter is complex, unclear and/or multiple complaints have been raised, we may ask you to clarify the scope of your complaint and (where necessary) extend the timeframe for the investigation and provision of a full response.	By up to a further 30 days.

We will keep you informed throughout the process and treat your complaint in strict confidence.

5. If You Are Not Satisfied

If you are unhappy with our response, or we have not replied within the applicable timeframe, you can escalate your complaint to the **Information Commissioner's Office (ICO)**:

- **Website:** www.ico.org.uk
- **Telephone:** 0303 123 1113
- **Post:** Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

You may also contact the ICO directly at any time without going through our internal process first.

6. Record Keeping and Review

We will keep a record of all complaints and use them to improve our data protection practices. Complaint records will be retained for **six (6) years** after resolution. This policy will be reviewed **annually** and updated whenever there are changes to the law or any guidance issued by a supervisory authority such as the ICO.