

HRMNY Ltd – Privacy Policy

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# PRIVACY POLICY

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## 1. Introduction

HRMNY Ltd is committed to safeguarding the privacy and personal data of all individuals whose information we collect, store, or process in the course of our operations. This includes data processed for statutory assessments, care planning, legal representation, case review, and financial transaction processing on behalf of public sector partners. This Privacy Policy explains how HRMNY complies with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and other relevant legal frameworks. It sets out how personal data is collected, the lawful basis for its use, how it is stored and protected, and how individuals can exercise their data protection rights under UK law.

## 2. Scope and Purpose

This policy applies to all personal data processed by HRMNY Ltd, including special category data and financial data, whether held in electronic, verbal, or paper formats. It covers the collection, recording, organisation, structuring, storage, adaptation, alteration, retrieval, consultation, use, disclosure, erasure, and destruction of data.

The purpose of this policy is to:

- Ensure that HRMNY processes personal data lawfully, fairly, and transparently
- Protect the rights and freedoms of individuals whose data we control or process
- Prevent unauthorised or unlawful access to personal data
- Demonstrate accountability to regulators, including the Information Commissioner's Office (ICO)
- Provide clear procedures for staff, partners, and individuals regarding the use of data

### **3. What Personal Data We Collect**

HRMNY collects personal data directly from service users, assessors, public sector clients, and third-party professionals. The types of data collected include:

- Full name, date of birth, address, contact details
- National Insurance numbers, NHS numbers, legal reference numbers
- Assessment reports, capacity evaluations, health and care plans
- Medical histories, social work reports, safeguarding concerns
- Financial information related to payments, transactions, and audit logs
- Communications between involved professionals and parties to proceedings

### **4. Lawful Basis for Processing**

HRMNY Ltd ensures that all personal data is processed under a valid legal basis as defined by Articles 6 and 9 of the UK GDPR. The primary bases we rely on include:

- Consent: where explicit, informed consent has been given by the data subject for one or more specific purposes.
- Legal Obligation: where processing is necessary to comply with a legal requirement, such as safeguarding responsibilities or court orders.
- Vital Interests: to protect the life or serious wellbeing of an individual.
- Public Task: where processing is necessary for the performance of a task carried out in the public interest or under official authority.
- Legitimate Interests: in limited cases where processing is necessary for HRMNY's legitimate functions and these interests are not overridden by the rights of the data subject.

Special category data, including health and legal information, is processed under Article 9(2)(h) (health or social care) and 9(2)(g) (substantial public interest) of the UK GDPR.

## 5. Your Data Protection Rights

Under the UK GDPR, individuals have the following rights, which HRMNY upholds through clearly documented procedures:

- Right to be informed: You have the right to know what data is collected and how it is used.
- Right of access: You may request a copy of the personal data HRMNY holds about you within one calendar month.
- Right to rectification: You may ask for your data to be corrected if it is inaccurate or incomplete.
- Right to erasure: Also known as the 'right to be forgotten', this applies in certain contexts where data is no longer needed or consent is withdrawn.
- Right to restrict processing: You can request that processing be limited under specific circumstances.
- Right to object: You can object to processing based on legitimate interest or for direct marketing.
- Right to data portability: In some cases, you may request that data be transferred to another controller.
- Rights in relation to automated decision making and profiling: You have rights where automated processes are used without human involvement.

## 6. Data Security and Safeguards

HRMNY Ltd implements robust technical and organisational measures to protect personal data, including:

- Encryption of all data in transit and at rest using industry-standard protocols
- Multi-factor authentication and secure login procedures
- Role-based access control (RBAC) and minimum access permissions
- Regular vulnerability scanning, penetration testing, and patching cycles
- Secure audit trails and logging for all data access and data sharing events
- Staff training on confidentiality, cyber hygiene, and incident reporting procedures

## 7. Third Party Processors and Data Sharing

HRMNY engages third-party processors for hosting, system support, and specialist data services. All third parties:

- Are subject to GDPR-compliant Data Processing Agreements (DPAs)
- Undergo security and compliance vetting before being contracted
- Are monitored for contractual compliance and breach readiness
- Must report data incidents to HRMNY within 24 hours of discovery

No data is shared with external organisations unless a lawful basis has been established, and where appropriate, subject to data minimisation, encryption, and audit logging requirements.

## **8. Contacting Us and Complaints**

For any questions or concerns about this policy or the handling of your data, please contact HRMNY's Data Protection Officer at:

Email: [hello@hrmny.co.uk](mailto:hello@hrmny.co.uk)

Post: HRMNY Ltd, Data Governance Team.TW1 4TJ

If you are dissatisfied with how your data is handled, you may also contact the Information Commissioner's Office (ICO) via [www.ico.org.uk](http://www.ico.org.uk) or by calling 0303 123 1113.