

CareBoodle Privacy Notice

Version 1.0

CareBoodle Ltd

1. Who We Are

CareBoodle Ltd (“CareBoodle”, “we”, “us”, “our”) provides a secure digital tool to support carers in recognising and documenting possible delirium or acute deterioration in older adults using the PINCH ME framework.

Registered Company: CareBoodle Ltd

Privacy Contact: kirsten@careboodle.com

Data Protection Lead: Dr Kirsten Protherough

2. Our Role in Data Protection

CareBoodle operates in two ways:

A. Enterprise Deployments (Domiciliary Care Agencies)

- The **care provider is the Data Controller**
- CareBoodle is the **Data Processor**

This means the care provider decides why and how personal data is used. We process data on their documented instructions.

For rights requests, please contact your care provider in the first instance.

B. Direct / Self-Serve Deployments (if used)

- CareBoodle Ltd acts as the **Data Controller**
- We determine the purposes and means of processing.

3. What Personal Data We Collect

A. Carer (User) Data

- Name
- Work email address
- Role and employer
- Authentication details
- Activity logs
- Support communications

B. Care Recipient Data (Special Category Health Data)

- Name
- Date of birth
- Postcode (not full address)
- Sex
- Structured health observations (e.g. pain, hydration, infection prompts)
- PINCH ME related factors
- Actions taken
- Escalation outcomes
- Timestamps
- Limited structured free text

We do not collect:

- Images or videos
- Full address
- Unnecessary identifiers

4. Why We Process Personal Data

We process personal data to:

- Support recognition and documentation of suspected delirium or deterioration
- Improve escalation communication
- Support governance and quality assurance
- Generate aggregated, non-identifiable insights for service improvement
- Provide technical support

We do **not**:

- Sell personal data
- Market directly to care recipients
- Use automated decision-making for diagnosis

CareBoodle is not a diagnostic device and does not replace professional judgement.

5. Lawful Basis for Processing

Enterprise (Care Provider as Controller)

Care Providers typically rely on:

- **Article 6(1)(f)** – Legitimate interests (safe care delivery and record-keeping)
- **Article 9(2)(h)** – Health and social care provision

In pilot scenarios involving evaluation activity, explicit consent may also be used.

Direct / Self-Serve (CareBoodle as Controller)

We rely on:

- **Article 6(1)(b)** – Contract
- **Article 9(2)(a)** – Explicit consent for health data

6. Who Can Access the Data

Access is restricted to:

- Authorised carers and supervisors within the care provider organisation
- CareBoodle support staff on a strictly need-to-know basis
- Sub-processors providing secure hosting and technical infrastructure

All access is role-based and logged.

7. Data Storage and Security

We use:

- UK / EEA hosting by default
- Encryption in transit and at rest
- Role-based access controls
- Audit logging
- Monitoring and incident response procedures
- Confidentiality agreements for staff

International transfers are avoided where possible and protected by appropriate safeguards if required.

8. Data Retention

CareBoodle Platform

We retain platform records for:

8 years after end of care / last entry

After this period, data is securely deleted or anonymised unless required for safeguarding, complaints, investigations, or legal reasons.

Care Provider Records

Care providers export a PDF summary into their own care record system. They retain that record according to their retention policy and commissioning requirements.

9. Your Rights

Under UK GDPR, individuals have the right to:

- Access their personal data
- Request correction of inaccurate data
- Request restriction of processing
- Object to certain processing
- Request erasure (where legally applicable)

Enterprise deployments:

Please contact your care provider directly.

Direct/self-serve:

Contact us at: kirsten@careboodle.com

You also have the right to complain to the Information Commissioner's Office (ICO):

www.ico.org.uk

10. Data Sharing

We share data only:

- Within the care provider organisation
- With healthcare professionals via the care provider where required
- With contracted sub-processors under Data Processing Agreements
- In aggregated, non-identifiable format for reporting

We never sell identifiable personal data.



11. Children

CareBoodle is not intended for use by children.

12. Changes to This Notice

We may update this Privacy Notice from time to time.

Material changes will be communicated appropriately.