

CareWorks Privacy Policy Customers



caredirector
the integrated health & social care system





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REVISION AND SIGNOFF SHEET

Change Record

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Internal Review

Name	Position	Version Approved	Date

Locations this Document Covers

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 Blackthorn Road
 Sandyford Industrial Estate
 Dublin 18
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Both office and home workers

CareWorks UK Limited
 Covers home workers

CareDirector USA LLC
 Covers home workers



1. GENERAL STATEMENT

At CareWorks Limited (hereinafter “CareWorks”), we value our customers and take pride in providing you with the best software development and support services.

CareWorks collects certain personal information about you to facilitate our relationship. We know how much you value your privacy. We at CareWorks are committed to keeping your information secure. Therefore, we provide this Privacy Policy to outline the information CareWorks will collect and how that information will be used. Additional policies and procedures described in our Terms of Use and License Agreements should be reviewed.

1.2 Privacy Principles

- CareWorks is committed to protecting the privacy of our customer’s personal data.
- CareWorks makes every effort to protect all personal data, such as name, address, ID information, that we obtain.
- CareWorks maintains physical, technological and administrative safeguards to protect personal data.
- CareWorks permits only authorised employees and contractors, including but not limited to consultants, to have access to some or all personal data of our customers as needed.

1.3 Consent

CareWorks does not collect, use, or share personal data without your consent. You have the right to withdraw your consent at any time. The reason we collect personal data and how it is used are included in this Privacy Policy under Use.

1.4 Collection of your Personal Data

CareWorks obtains and uses personal data, as defined below, for its business use and for local, national and European Union-related reporting requirements.

We may collect, store and use the following kinds of data. Providing personal data to us is voluntary and will require your consent. However, if you do not provide personal data to us, then we will not be able to provide you with information on our services that you many have requested or to contact you regarding your query or to communicate with you.

We may collect and maintain both Personal and Non-Personal Information needed for these purposes:

- "Personal Information" includes any information by which you can be personally identified, and includes:
 - your first name, last name, address, and phone number;
 - email address;
 - IP Address, geographical location, browser type and version, operating system, referral source.



- "Non-Personal Information" is information about you that does not personally identify you. Information of this type is most commonly obtained through your use of our website. Data is collected in aggregate and anonymously, which may include the type of Internet browser you are using, the type of computer operating system you are using, the pages you visited, and how you arrived at our website. This information is used for the purpose of creating a better user experience and to identify areas for improvement on our website.
- Personal data that is submitted in regards to other person(s) will only be accepted once consent has been received from that person(s) and documented.

1.5 Use of your Personal Data

We use the data collected for legally required reporting to governmental or regulatory entities, marketing our products, supporting products purchased and providing continuing services. Personal data submitted via the website may be used for the purposes outlined in this policy.

Authorised use of personal data includes:

1. Providing online product and services to you and your business
2. Personalising your experience on our online solution sets
3. Sending solutions and products purchased through our online solutions
4. Confirmations, statements, invoices, or other necessary emails to ensure a high level of customer service
5. Non-marketing email communication
6. Newsletters and other email communication mailing lists that you have subscribed to
7. Submission of summary result reporting based on the product and services you are subscribed to
8. Providing statistical information to appropriate parties on overall usage of products and services
9. Sending notification on updates to this policy

Clients have the option of providing, or not providing, consent and use of their personal data.

Most of the services available on this site are intended for persons 16 years of age and older. We will not knowingly collect, use or disclose personal data from a minor under the age of 16, without obtaining prior consent from a person with parental responsibility (e.g., a parent or guardian) through direct off-line contact. We will provide the parent with (i) notice of the specific types of personal data being collected from the minor, and (ii) the opportunity to object to any further collection, use, or storage of such information. We abide by laws designed to protect children.

1.6 Sharing of Information

We will not sell, share, or otherwise distribute your personal data to third parties (vendors/processors/providers/others) except as provided in this Privacy Policy. CareWorks may share personal data with our subsidiaries and other third parties who



act for or on our behalf, for further processing in accordance with the purpose(s) for which the data were originally collected or may otherwise be lawfully processed, such as **providers of hosting services**. Doing so allows us to efficiently conduct our business.

We believe these providers exercise reasonable care to protect your personal data. These third parties have contracted with us to only use personal data for the agreed upon purpose, and not to sell your personal data to third parties, and not to disclose it to other third parties except as may be required by law, as permitted by us or as stated in this Privacy Policy.

Your personal data may also be disclosed, if necessary, as required by law or regulation, to comply with legal, regulatory or administrative requirements of any governmental authorities, to comply with a court order, subpoena, search warrant or other valid legal process, in connection with any legal action, claim or dispute and for the protection of persons or property, here or abroad.

1.7 Data Transfer Abroad

As a global organisation, data we collect may be transferred internationally throughout CareWorks' worldwide organisation or to third parties that act on our behalf as noted in 'Sharing of Information'. Some of these foreign jurisdictions may not provide the same level of privacy protection as your local jurisdiction. By providing consent, you consent to such transfers of your Personal Data. Without such consent, CareWorks is not able to provide you with the services or products listed under 'Collection of your Personal Data'. The personal data will be transferred with all appropriate and suitable safeguards as described in 'Data Security'.

CareWorks vendor(s) or processor(s) located in the United States are required to maintain a Privacy Shield certification.

1.8 Data Retention and Destruction

CareWorks keeps personal data for as long as is necessary for fulfilment of each use described in this policy, or as legally required by appropriate local, national, EU-based and other regulatory bodies. Past that period, records, both physical and electronic, are destroyed.

1.9 Cookies and Other Technologies

Cookies are used on the company's website. By using our website, you agree that cookies are to be placed on your device as further explained below.

Cookies are small pieces of data that a website sends to your computer's web browser while you are navigating through it. They have many different purposes, but mainly, cookies enable you to navigate between pages easily, remembering your preferences, and eventually to improve the user experience. These cookies may then be stored on your machine to identify your computer.



1.9.1 Types of Cookies

CareWorks only uses cookies for Google Analytics, they are anonymous and do not record any personal data.

1.9.2 Use of Cookies

The performance cookies used on this website do not collect personal data.

Other cookies can collect personal data (including information from cookies placed via our advertisements on third party websites):

- If a user is a registered user.
- If we send you a targeted email which includes web beacons, cookies or similar technologies we will know whether you open, read, or delete the message.
- When you click a link in a marketing e-mail you receive from CareWorks, we will also use a cookie to log what pages you view and what content you download from our websites, even if you are not registered at or signed into our site.

Other non-cookie technologies:

CareWorks also enables the use of technologies that perform functions similar to cookies such as web beacons or other technologies that may be included in marketing e-mail messages or newsletters in order to determine whether messages have been opened and links clicked on. Web beacons do not place information on your device but may work in conjunction with cookies to monitor website activity.

“Do-not-track” signals:

Some web browsers may transmit "do-not-track" signals to the websites with which the browser communicates. As of the Effective Date of this Privacy Policy, an industry standard has not yet been established on how to respond to these signals. Therefore, our website does not currently recognise or respond to these signals, but CareWorks will reassess its response approach once a standard is established. However, at this time you can generally express your privacy preferences regarding the use of most cookies through your web browser.

How to accept or refuse cookies

If you do not want to receive cookies from our website, you may set your browser to refuse cookies or to notify you when you receive a cookie, which you may then accept or refuse upon such notice. You can also generally set your browser to turn off cookies. To understand how to do this, please consult your browser’s “Tools” section, or any other similar heading.

We recommend that you leave the cookies active. Bear in mind that if you block, turn off or otherwise reject our cookies, some web pages may not display properly, or you will not be able to use any website services that require you to sign in.

1.10 Links to Third Party Websites

This website contains links to third party sites. These links are provided for convenience purposes and are not under the control of CareWorks. CareWorks does



not make representations and warranties, express or implied, regarding the content of these linked sites. These links do not constitute or imply an endorsement, authorisation, sponsorship or affiliation by CareWorks with respect to a third party, a third party's web site, the content of a third party's web site, or products or services provided by a third party.

The information practices of those web sites linked to our website is not covered by this Policy. CareWorks is not responsible for the privacy policies of websites to which it links. If you provide information to such third parties, different rules regarding the collection and use of your personal information may apply. We strongly suggest you review such third party's privacy policies before providing data to them.

1.11 Data Security

We use security safeguards to protect personal data from unauthorised access. We have policies and procedures in place to set forth physical, administrative and technological safeguards around data security. We train our employees in these policies and procedures. In the event of an actual or suspected breach, CareWorks follows the steps outlined in its Incident Response Plan Policy to respond to same.

Physical access to all CareWorks offices and other facilities are security controlled which include locks that are opened by keys or codes. All visitors entering or leaving the facilities must report to reception to be signed in and out.

Information systems and communications equipment are placed in secure areas and protected by additional physical security measures that permit access only to the employees who need access, in addition to operational processes, environmental controls and fire detection/suppression systems to safeguard against accidental loss, theft or unauthorised removal, misuse, damage or unauthorised access.

All gateways to the internet are protected by a firewall and access to both internal and external networks are restricted and controlled.

Endpoint security is constantly being reviewed to protect the network against unauthorised access, data loss or destruction.

Access to information is through a secure login process with a unique identifier.

Key personnel laptops have full disk encryption software. The software is configured with a system lock-out feature enabled after a certain number of incorrect password entries.

Critical servers are scanned using network and system vulnerability scanners.

On customer sites web applications are scanned by automated penetration tools for application level security vulnerabilities that may be susceptible to hacking.

User acknowledges that transmission of data of the public internet is insecure and transmission of data over the internet cannot be guaranteed.



User is responsible for keeping secure passwords generated on CareWorks online applications. CareWorks hashes passwords and does not have access to passwords through back end systems to view your password. CareWorks will never ask for a password other than on the log in page of our online solution.

1.12 Notices

We reserve the right to modify or change this Privacy Policy at any time. Any such change, update, or modification will be effective immediately upon release, and reflected with the updated effective date and revision number. If we make any changes to our Policy, we will post the updated Policy, provided on an updated homepage link, and may post other places we deem appropriate.

We will provide you with a copy of our Privacy Policy at least once a year, as long as you are a current customer. This Policy will be mailed to your address of record. If we make any material changes to our Privacy Policy, we will provide our current customers with revised Policy that describe our new policies and procedures that apply to them. This revised Policy will be mailed to your address of record.

1.13 Your Personal Data Rights

CareWorks offers transparency in the personal data that we collect and maintain and acknowledges your rights in relation to your personal data.

We provide you with the ability to request access to your personal data records.

Whenever we process personal data, we take reasonable steps to ensure that your personal data is kept accurate and up-to date for the purposes for which it was collected. We provide you with the ability to request that your information be rectified or corrected.

We provide you with the ability to object to the processing of your personal data if such processing is not reasonably required for a legitimate business purpose as described in this policy or in our compliance with law. We provide you with the ability to request your personal data be transferred or erased.

In the case of electronic direct marketing, we will provide you with a method to opt out of receiving further marketing materials or with a method to opt in if required by law.

CareWorks reserves the right to deny a request based on lack of identification or other legitimate reasons. Requests to delete personal data will be subject to any applicable legal and ethical reporting or document filing or retention obligations imposed on us. In addition, the personal data may have been destroyed, erased or made anonymous in accordance with our record retention obligations and practices.



We provide a response to a request within one month; either to fulfil the request, deny the request, explain why we cannot honour the request, or inform you of a necessary extension. Proper identification is required. We reserve the right to charge a fee for excessive requests.

You have the right to lodge a complaint with a supervisory authority.

If you wish to make a request or have any questions, please contact us as noted below in Contact Information.

1.14 Contact Information

You may contact us:

- For product or service information: Email: info@careworks.ie
Telephone: 01 2949560/02890 327329
or write to us at: CareWorks Limited
Attn: Customer Service, CareWorks Limited, Unit 5B Sandyford Business Centre, Blackthorn Road, Sandyford Industrial Estate, Dublin 18.
- For information regarding our Privacy Policy or to make a request related to your Personal Data rights:
Chief Executive
Email: dataprotectionofficer@careworks.ie
Telephone: 01 2949560/02890327329
or write to us at: CareWorks Limited
Attn: Data Protection, CareWorks Limited, Unit 5B Sandyford Business Centre, Blackthorn Road, Sandyford Industrial Estate, Dublin 18.

If you are not happy with how we have processed your personal information or handled your privacy rights, you can complain to the Data Protection Commission by contacting them using the details below:

Data Protection Commission,
Canal House,
Station Road,
Portarlinton,
Co. Laois, R32 AP23
Telephone: +353(0)761 104800
LoCall: 1890 252231
Fax: +353 57 8684757
Email: info@dataprotection.ie