HICARE THERAPY PRIVACY POLICY

Effective date: **22 October 2026** · *Version 1.0*

1. Who we are

1.1 HiCare Ltd ("HiCare", "we", "us") is a company registered in England and Wales (company number 16121869), registered office 33 Lower Belgrave Street, London SW1W 0LS. We are registered with the Information Commissioner's Office (ICO) under number ZC010809.

1.2 HiCare is the **controller** of the personal data described in this policy. This means we decide how and why it is used and are responsible for protecting it.

1.3 Questions or requests about your data: info@hicare.org.uk, 07778 923980, or by post to the address above.

1.4 This policy covers: (a) service users who receive home therapy visits; (b) people who book visits for someone else, such as a family member; (c) physiotherapists and occupational therapists who work through HiCare ("Therapists"); and (d) visitors to our website and app and anyone who contacts us.

1.5 Therapists are independent, self-employed professionals. Your contract for therapy is with your Therapist; HiCare acts as the Therapist's booking and payment agent. When Therapists record your visits in the HiCare System, they do so on our behalf and must follow our instructions on data protection.

2. What information we collect

Who	What we collect	Where it comes from
Service users	Name, date of birth, address, phone, email; GP and emergency contact details; health information you give when booking; documents you choose to upload (such as hospital discharge letters); therapy records (assessment, treatment notes, progress); booking history; messages, payment details, feedback and complaints.	You, the person who books for you, and your Therapist.
People who book for a service user	Name, contact details, relationship to the service user, any legal authority (for example a lasting power of attorney), payment details.	You (in case it applies)
Therapists	Name, date of birth, home address, contact details, National Insurance number; HCPC registration, qualifications and reference; identity and right-to-work documents; DBS check results; insurance; bank details; profile, photograph and reviews; bookings, earnings, cancellations and complaints.	You, your referee, the HCPC register, the DBS Update Service, service users (reviews).
Website visitors	Device and browser information, IP address, pages visited, cookie choices.	Your device. See our Cookie Policy.

We do not see your full card details. Payments are processed by our payment provider **Stripe**, which shares only limited details with us (such as the last four digits of a card). You need to give us the information we ask for when booking, or when joining as a Therapist, so we can provide our services. If you do not, we may not be able to take your booking or onboard you.

3. Why we use it and our legal basis

Data protection law requires a legal basis for each use of your data. For health information and criminal record information there must also be an additional condition, shown in the third column.

Purpose	Legal basis (UK GDPR Art 6)	Health or criminal record data
Arranging bookings, taking payment, customer support	Contract (6(1)(b)). Where someone books for a service user: our legitimate interests (6(1)(f)) in providing the booking	Health care under a contract with a health professional (Art 9(2)(h); Data Protection Act 2018 (DPA), Sch 1 para 2)
Holding the records your Therapists make, keeping them safe, and making them available to any Therapist you book through HiCare	Contract; legitimate interests	Health care under a contract with a health professional (Art 9(2)(h)), processed under a duty of confidentiality (DPA s.11)
Sharing a summary with your GP or other professionals	Legitimate interests, with your agreement	Health care (Art 9(2)(h))
Safeguarding people at risk	Legitimate interests; vital interests (6(1)(d))	Safeguarding (Art 9(2)(g); DPA Sch 1 para 18)
Complaints, incidents, insurance and legal claims	Legitimate interests	Legal claims (Art 9(2)(f))
Checking Therapists before and during their work with us	Contract; legitimate interests in safe services	Criminal record checks: safeguarding (Art 10; DPA Sch 1 para 18)
Paying Therapists, accounts and tax	Contract; legal obligation (6(1)(c))	—
Reporting Therapists' earnings to HMRC	Legal obligation (Platform Operators Regulations 2023)	—
Running, securing and improving our website and services; preventing fraud	Legitimate interests	—
Publishing ratings and reviews	Legitimate interests	—
Marketing emails about our services	Consent, or for existing customers our legitimate interests (PECR reg 22(3)). You can opt out at any time.	—

3.1 If you withdraw consent to marketing, this does not affect your bookings or records.

3.2 We do not make decisions about you using only automated processing that have legal or similarly significant effects. Therapist profiles are ranked using availability, distance, ratings and reliability, but any decision to suspend or end a Therapist's access is made by a person.

4. Who we share it with

- **Your Therapist**, so they can provide your visit. Your therapy record can also be seen by any other Therapist you book through HiCare, so your care can continue if you change Therapist. If you would prefer a new Therapist not to see earlier notes, tell us.
- **Your GP or other professionals involved in your care**, with your agreement, or without it where the law allows (for example to protect someone from serious harm).
- **Our service providers**, who act on our instructions under contract: website hosting and cloud services, payment processing, email and office software, IT support, and our accountants.
- **Professional advisers and insurers**, where needed for advice, insurance or legal claims.
- **Authorities**, where the law requires or allows it: HMRC (Therapist earnings), the police, local authority safeguarding teams, the HCPC and the Disclosure and Barring Service.
- **A buyer of our business**, if HiCare is sold or merged, under a duty of confidentiality.

What Therapists can see. A Therapist can see only: your booking details and the information you give when booking; documents you choose to upload, such as a hospital discharge letter; and the therapy records made by them or by any other Therapist you have booked through HiCare. Therapists cannot see information held about you by any other HiCare service.

We do not sell personal data.

International transfers. Some of our service providers, such as our payment and cloud providers, may process your data outside the UK. Where they do, we make sure it is protected, for example by UK adequacy regulations or the ICO's International Data Transfer Agreement or Addendum. Contact us for details.

5. How long we keep it

Information	How long
Therapy records	8 years after the last treatment (in line with Chartered Society of Physiotherapy guidance), or longer if a complaint or claim is open
Booking, payment and accounting records	6 years after the end of the financial year they relate to
Complaints	6 years after the complaint is closed
Therapist onboarding and contract records	For the length of the relationship, then 6 years
DBS certificate information	We record the certificate number, date of issue, type of check and our decision, for as long as the Therapist works with us and 6 years after. We do not keep a copy of the certificate after checking it, except for as long as needed to resolve a dispute
Information reported to HMRC	At least 6 years after the reporting period
Marketing preferences	Until you opt out (we then keep your details on a suppression list so we do not contact you again)

Information	How long
Website and cookie data	See our Cookie Policy

6. Your rights

You have the right to:

- **access** a copy of your data;
- **correct** inaccurate data;
- **erase** your data, **restrict** its use, or **object** to its use, in some circumstances;
- **receive** data you gave us in a portable format, in some circumstances; and
- **withdraw consent** where we rely on it.

6.1 Some of these rights are limited by law. In particular:

(a) we may keep therapy records for the periods in section 5, even if you ask us to delete them, where we need them to show what care was provided or to deal with a complaint or legal claim;

(b) we may continue to use your data after you object, if we have compelling legitimate grounds or need it for a legal claim;

(c) when you ask for a copy of your data, we may withhold information about other people, or health information that a health professional advises could cause you or someone else serious harm; and

(d) we may refuse a request, or charge a reasonable fee, if it is manifestly unfounded or excessive, for example a repeated request for the same information. If we refuse a request, we will explain why and tell you how to complain to the ICO.

6.2 We respond within one month. If a request is complex, we may extend this by up to two further months and will tell you why. We may ask for proof of identity, and proof of authority if you are asking on someone else's behalf.

6.3 To make a request, contact us using the details in clause 1.3.

7. Keeping your data secure

7.1 We use access controls, encryption and secure systems. Therapists must record visits only in the HiCare System and must report any data breach to us within 24 hours. We will tell you and the ICO about a breach where the law requires.

8. Complaints

8.1 If you are unhappy with how we have used your data, please contact us first. We will acknowledge your complaint within 30 days and respond without undue delay.

8.2 You can also complain to the ICO: ico.org.uk, 0303 123 1113.

9. Other points

9.1 Our services are for adults. We do not knowingly collect data from children, except where a child is mentioned in a safeguarding concern.

9.2 We may update this policy. We will post the new version on our website and tell you of significant changes.