# Harbor London Privacy Policy

Empathy in every stride. Expertise in every solution.

### 1. Purpose of this notice

Your privacy is our top priority. This notice explains how Harbor London Limited ( " Harbor ") collects, uses, and protects your personal information in connection with our one-client-at-a-time residential treatment services for mental health and addiction.

We are committed to maintaining your confidentiality, ensuring transparency, and processing your information in accordance with applicable data protection laws, including the UK GDPR and Data Protection Act 2018.

# 2. What we mean by "personal data"

"Personal Data" refers to any information that can identify you directly or indirectly — such as your name, contact details, or medical information.

Certain information is considered special category data, which includes details about your health, ethnicity, religious beliefs, sexual orientation, or biometric data. Harbor treats all such information with the highest level of care and confidentiality.

In limited cases, we may also collect information about criminal convictions, but only where required by law or regulation.

#### 3. Who we are

Harbor London Limited acts as the data controller — meaning we determine how and why your personal data is processed.

If you have questions about how we handle your data, please contact:

Janine McNab – Chief Operating Officer

janine@harborlondon.com

### 4. When and how we collect information

We collect information directly from you when you:

- Enquire about or access our treatment services
- Communicate with us by phone, email, or in person
- Visit one of our properties or websites
- Provide information as a referring clinician, family member, or representative

We may also receive information from trusted healthcare partners or publicly available sources when appropriate.

### 5. How we use your information

We use your personal data to:

- Deliver safe, effective, and personalised treatment and care
- Fulfil our contractual and legal obligations
- Maintain accurate clinical and administrative records
- Communicate with you and your authorised representatives
- Ensure the safety and security of our clients and staff
- Comply with regulatory and auditing requirements

We will only use your information when one of the following lawful bases applies:

- Performance of a contract with you
- Legal or regulatory obligation
- Legitimate interest (such as ensuring the quality and safety of care)
- Your explicit consent, where required (for example, to share data with another clinician)

### 6. Sharing your information

Harbor never sells or shares personal data for marketing purposes.

However, we may share your data, always confidentially, with:

- Healthcare professionals directly involved in your care
- Regulatory bodies and law enforcement when required by law
- Our insurers, auditors, and professional advisers
- IT and system support providers acting under strict confidentiality agreements

We require all third parties to handle your data securely, to process it only for agreed purposes, and to comply fully with applicable laws.

If data is transferred outside the UK or EEA, Harbor ensures that appropriate safeguards are in place to protect your privacy.

#### 7. How we keep your data safe

Your privacy is woven into every part of what we do.

We use secure systems, restricted access, and strong encryption to protect your data from unauthorised access, alteration, or loss. All staff are trained in confidentiality and data protection as part of our professional and ethical standards.

#### 8. How long we keep your data

We retain personal data only for as long as necessary to:

- Provide your care and aftercare
- Meet legal, accounting, and reporting requirements
- · Defend or exercise legal claims, if relevant

When data is no longer needed, it is securely deleted or anonymised.

# 9. Your rights

You have the right to:

- Be informed about how your data is used
- Access your personal data
- Request correction of inaccurate information
- Request deletion of your data ( " right to be forgotten ")
- Restrict or object to certain types of processing
- Request data portability
- Withdraw consent, where applicable

To exercise any of these rights, please contact janine@harborlondon.com. You may also raise concerns with the Information Commissioner 's Office (ICO) at www.ico.org.uk.

# 10. Our commitment to your privacy

At Harbor, privacy is more than compliance — it 's care.

We understand that trust is central to your healing journey. Every measure we take is designed to safeguard your dignity, your confidentiality, and your peace of mind.

Harbor London Limited Version 2.0 – October 2025 Everything we do is centred around you.