

COMPANY NAME	Dedicare UK Limited ("Dedicare")
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POLICY	PRIVACY POLICY
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Dedicare is a recruitment business which provides work-finding services to its clients and work-seekers. Dedicare must process personal data (including sensitive personal data) to provide these services - in doing so, Dedicare acts as a data controller. You may give your personal details to Dedicare directly (email/ mail/telephone/social media), on an application or registration form, via our website, by visiting our office, or we may collect them from another source such as a jobs board. Dedicare must have a legal basis for processing your personal data. For the purposes of providing, you with work-finding services and/or information relating to roles relevant to you we will only use your personal data in accordance with this Privacy Policy. At all times we will comply with current data protection laws.

1. COLLECTION AND USE OF PERSONAL DATA

a. Purpose of processing and legal basis

Dedicare will collect your personal data (which may include sensitive personal data) and will process your personal data for the purposes of providing you with work-finding services. This includes for example, contacting you about job opportunities, assessing your suitability for job opportunities, updating our database, putting you forward for job opportunities, arranging payments to you and developing and managing our services and relationship with you and our clients.

In some cases, we may be required to use your data for the purpose of investigating, reporting, and detecting crime and to comply with laws that apply to us. We may also use your information during internal audits to demonstrate our compliance with certain industry standards.

Dedicare must have a legal basis to process your personal data. The legal bases we rely upon to offer our work-finding services to you are:

- Your consent to collect and process your personal data,
- Collecting and processing your personal data for the purpose of providing you with work-finding services,
- Processing and retaining your personal data is necessary for compliance with the legal obligations Dedicare is subject to. The legal obligations are set out below:
 - I. The Conduct of Employment Agencies and Employment Businesses Regulations 2003 requires us to retain records for least one year after their creation and at a least one year after the date on which we last provided work-finding services.
 - II. Payroll records, holiday pay, sick pay and pensions auto-enrolment records will be retained for as long as is legally required by HMRC and associated national minimum wage, social security and tax legislation.

- Processing your personal data is necessary to secure work for you in line with the requirements of a contract to which you enter and is necessary for the performance of a contract.

b. Legitimate interest

By instructing Dedicare to look for work for you and providing us with your personal data you will be giving your consent to processing your data for work-finding purposes. It is in the legitimate interest of you, Dedicare and clients of Dedicare to process your personal data to undertake the mandatory pre- and post-employment checks required to secure you work.

Where Dedicare has relied on a legitimate interest to process your personal data our legitimate interests are as follows:

- Managing our database and keeping work-seeker records up to date
- Providing work-finding services to you and our clients

c. Statutory and contractual requirements

Dedicare has certain legal and contractual requirements to collect personal data (e.g. to comply with the Conduct of Employment Agencies and Employment Businesses Regulations 2003, immigration and tax legislation, and in some circumstances safeguarding requirements.) Our clients may also require this personal data, and/or we may need your data to enter into a contract with you. If you do not provide the required personal data we need to collect it is unlikely we will be able to provide work-finding services to you.

d. Recipient/s of data

Dedicare will process your personal data (which may include sensitive personal data) with the following recipients:

- Clients (including their preferred job/salary payment management portals) for securing you work and payment for services provided,
- Other recruitment agencies in the supply chain,
- Supply contracts and clients to report on the work completed by candidates under each contract (if applicable),
- Auditors as instructed by our clients or under the obligations of our supply contracts, when an audit is undertaken where we have secured work for you,
- Former employers where we may request references,
- Occupational Health service providers to obtain a certificate of fitness for work,
- Mandatory training providers to enable you to undertake any mandatory training requirements as required,
- Payroll service providers who manage payroll on our behalf or other payment intermediaries and pension provider whom we may introduce you to,
- Service providers who validate your passport and/or right to work in the UK and undertake criminal records checks,
- General Medical Council to confirm your licence to practise as a doctor in the UK,
- The Recruitment and Employment Confederation (REC),
- IT and CAM providers.

e. Sharing data with third parties

Where we process your data with third parties Dedicare has undertaken the relevant steps to ensure your data is adequately protected by having the relevant agreements in place. For information on the

third parties we work with contact mail@dedicare.co.uk.

2. PERSONAL DATA WE COLLECT

Dedicare may collect the following personal data from you:

a. Personal data

- Full name, date of birth, gender, nationality, next of kin details,
- Contact details, including but not limited to telephone number/s, email address, skype address and postal address,
- CV, employment history, training, qualifications,
- Passport and/or right to work, proof of identity,
- Bank details and national insurance number,
- Professional body registration and professional indemnity information,
- Information required to process a criminal record check, including fitness to practise information,
- Information required to process occupational health clearance and a fitness to work certificate,
- All other personal data not listed above provided to complete the mandatory pre-employment checks which enables Dedicare to provide work finding services.

b. Sensitive personal data

- Disability/health conditions relevant to the role,
- Criminal allegations and convictions,
- Fitness to practise declarations.

c. Source of the personal data

You may give your personal details to Dedicare by the following methods:

- By email, mail, telephone, social media, via our website or by visiting our office,
- On a registration form, occupational health medical questionnaire, criminal records check application form,
- From a job advert we have placed on a jobs board or by accessing a CV database.

3. OVERSEAS TRANSFERS

Dedicare will only transfer the information you provide to us to countries within and outside of the European Economic Area ('EEA') for the purposes of providing you with work-finding services with your permission. We will take steps to ensure adequate protections are in place to ensure the security of your information. The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein.

4. DATA RETENTION

Dedicare will retain your personal data (which may include sensitive personal data) only for as long as is necessary.

Different laws may also require us to keep different data for different periods of time. The Conduct of Employment Agencies and Employment Businesses Regulations 2003, require us to keep work-seeker records for at least one year (a) from the date of their creation or (b) after the date on which we last provide you with work-finding services.

We must also keep payroll records, holiday pay, sick pay and pensions auto-enrolment records for as

long as is legally required by HMRC and associated national minimum wage, social security and tax legislation. This is currently 3 to 6 years.

Contractual obligations with supply frameworks require us to retain personal data for a period of 7 years from the expiry or termination of the relevant contract agreement for contractual monitoring and audit purposes.

Where Dedicare has obtained your consent to process your personal data (which may include sensitive personal data) we will do so in line with our Record Retention Policy. Upon expiry of the retention period Dedicare will seek further consent from you. Where consent is not granted we will cease to process your data. You can request a copy of the Record Retention Policy by emailing mail@dedicare.co.uk.

5. YOUR RIGHTS

Dedicare is required to ensure you are aware you have the following data protection rights:

- The right to be informed about the personal data Dedicare processes on you;
- The right of access to the personal data Dedicare processes on you;
- The right to rectification of your personal data;
- The right to erasure of your personal data in certain circumstances;
- The right to restrict processing of your personal data;
- The right to data portability in certain circumstances;
- The right to object to the processing of your personal data that was based on a public or legitimate interest;
- The right not to be subjected to automated decision making and profiling; and
- The right to withdraw consent at any time.

Where you have consented to Dedicare processing your personal data (including sensitive personal data) you have the right to withdraw this consent at any time by contacting mail@dedicare.co.uk. Note, that if you withdraw your consent to further processing this does not affect any processing done prior to the withdrawal of your consent. There may be circumstances where Dedicare will still need to process your data for legal or official reasons. Where this is the case, we will tell you and we will restrict the data to only what is necessary for those specific reasons.

If you believe any of your data which Dedicare has processed is incorrect or incomplete, contact mail@dedicare.co.uk and we will take reasonable steps to check its accuracy and correct it where necessary. You can also contact us if you want us to restrict the type or amount of data we process for you, access your personal data or exercise any of the other rights listed above.

6. COOKIES

Dedicare may obtain data about you from cookies. Cookies are small text files which are placed on your computer by websites you visit. Cookies are widely used to make websites work, or work more efficiently, as well as to provide information to the owners of the site. Most web browsers allow some control of most cookies through the browser settings.

Dedicare use WordPress Login on our website which is necessary for our website to function effectively. We use Google Analytics which help us understand how website users find our website and from where, which website pages users interact with and how long users spend on each area of the website. When we advertise through social media such as Facebook, LinkedIn and Twitter, we will add a cookie to enable us to track our advertising effectiveness and user pathway through into Google Analytics.

Google Analytics only reports anonymous data and is not linked to personally identifiable information. These analytics help us to improve website content, layout and usability. You can request a copy of our Cookie Policy by contacting mail@dedicare.co.uk.

7. LOG FILES

We use IP addresses to analyse trends, administer the site, track users' movements, and to gather broad demographic information for aggregate use. IP addresses are not linked to personally identifiable information.

8. LINKS TO EXTERNAL WEBSITES

Dedicare website contains links to other external websites. Please be aware that Dedicare is not responsible for the privacy practices of such other sites. When you leave our website, we encourage you to read the privacy statements of each website which collects personally identifiable information. This privacy policy applies solely to information collected by the Dedicare website.

9. SALE OF DEDICARE

If Dedicare's business is sold or integrated with another business your details may be disclosed to our advisers and any prospective purchasers and their advisers and will be passed on to the new owners of the business.

10. DATA SECURITY

Dedicare takes every precaution to protect your personal data and prevent unauthorised access. Data is stored securely, and all software is current, patched and secured appropriately. The information is encrypted where possible. Firewalls are in place both locally in our office and on the cloud platform. Anti-virus software is in place across the organisation.

Your data is accessed only by authorised users who need the data to perform a specific function. Access is managed by password protected user accounts and where applicable specific user groups and permissions are allocated to access all data.

Dedicare uses all reasonable efforts to safeguard your personal information and we undertake periodic reviews of security to ensure data is protected and secure. However, you should be aware the use of email and the internet is not entirely secure and for this reason Dedicare cannot guarantee the security or integrity of any personal information which is transferred from you or to you via email or the internet. If you share a device with others we strongly recommend you do not select the "remember my details" function when this option is offered.

If you have any questions about data security contact mail@dedicare.co.uk.

11. CHANGES TO THIS PRIVACY POLICY

We will update this Privacy Policy from time to time. We will post any changes on the statement with revision dates. If we make any material changes, we will notify you.

12. COMPLAINTS OR QUERIES

If you wish to complain about this Privacy Policy or any of the procedures set out in it contact mail@dedicare.co.uk. You also have the right to raise concerns with the Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/concerns/>, or any other relevant supervisory authority should your personal data be processed outside of the UK without your permission and if you believe your data protection rights have not been adhered to.