

IPQ Healthcare Ltd

Company Name:	IPQ Healthcare Ltd ('the Company')
Company contact details:	Company Compliance Manager, via our website
Document	Privacy Notice (including for use on the company website)
Topic:	Data protection
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IPQ Healthcare Ltd (the Company) is a recruitment business which provides work-finding services to its clients and work-seekers. The Company must process personal data (including special categories of personal data) so that it can provide these services – in doing so, the Company acts as a data controller.

You may give your personal details to the Company directly, such as on an application or registration form or via our website, or we may collect them from another source such as a jobs board. The Company must have a legal basis for processing your personal data. For the purpose 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 statement. We will comply with current data protection laws at all times.

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1. Collection and use of personal data

a. Purpose of processing and legal basis

The Company will collect your personal data (which may include special categories of 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 those opportunities, updating our databases, putting you forward for job opportunities, arranging payments to you and developing and managing our services and relationship with you and our clients.

If you have opted-in we may also send you marketing information and news via email/text. You can opt-out from receiving these at any time by clicking “unsubscribe” when you receive these communications from us.

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

We 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
- Where we have a legitimate interest
- To comply with a legal obligation that we have
- To fulfil a contractual obligation that we have with you
- [insert any other legal basis that you rely on to process the data]

b. Legitimate interest

This is where the Company has a legitimate reason to process your data provided it is reasonable and does not go against what you would reasonably expect from us. Where the Company has relied on a legitimate interest to process your personal data our legitimate interests is/are as follows:

- Managing our database and keeping work-seeker records up to date;
- Providing work-finding services to you and our clients;
- Contacting you to seek your consent where we need it;
- Giving you information about similar products or services to those that you will have used from us recently;
- Set out any other legitimate interest for processing the data

c. Statutory/contractual requirement

The Company 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 require this personal data, and we may need your data to enter into a contract with you. If you do not give us the personal data we need to collect in order to comply with our statutory and legal requirements, we may not be able to continue to provide work-finding services to you and we may remove you from our assignment database.

d. Recipient/s of data

The Company will process your personal data and/or sensitive personal data with the following recipients:

- Clients (who we may introduce or supply you to)
- Your former employers who we may seek references from
- Payroll service providers who manage payroll on our behalf or other payment intermediaries who we may introduce you to
- Other recruitment agencies in the supply chain
- Auditors who are assessing the compliance and processes of the business to ensure its adherence to all relevant legislation and good practice guidance

2. Information to be provided when data collected not from the data subject

Categories of data: The Company has collected the following personal data on you:

Personal data:

- Name, address, mobile number, email
- National insurance number.
- Nationality (through right to work checks)

Special categories of personal data:

- Health information including whether you have a disability
- Criminal conviction(s)

Source of the personal data: The Company sourced your personal data/special categories of personal data:

- From jobs boards, LinkedIn
- A former employer
- A referee whose details you previously provided to us
- Software providers who we use to support our services
- Cookies listed in section 7

3. Overseas Transfers [Optional]

The Company may transfer the information you provide to us to countries outside the UK and/or the European Economic Area ('EEA') for the purposes of providing you with work-finding services. 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

The Company will retain your personal data only for as long as is necessary for the purpose we collect it. Different laws may also require us to keep different data for different periods of time. For example, the Conduct of Employment Agencies and Employment Businesses Regulations 2003, require us to keep work-seeker records for at least one year from (a) the date of their creation or (b) after the date on which we last provide you with work-finding services. We are required to keep your records relating to the right to work in the UK 2 years after employment or the engagement has ended alterable and working time records including your 48 hour opt out notice annual leave/holiday records 2 years from the time they were created.

Additionally, we must also keep your 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.

5. Your Rights:

Where the Company has obtained your consent to process your personal/special categories of personal data, we will do so in line with our retention policy. Upon expiry of that period the Company will seek further consent from you. Where consent is not granted the Company will cease to process your personal data.

6. Cookies

We may obtain data about you from cookies. These are small text files that are placed on your computer by websites that you visit. They are widely used to make websites work, or work more efficiently, as well as to provide information to the owners of the site. Cookies also enable us to deliver more personalised content.

The table below explains the cookies we use and why.

Cookie	Name	Purpose
Session Cookies	A Cookie that will only be stored on a device's memory during the current browser session. Once the session has been closed the Cookie will be deleted	These Cookies will allow a more streamlined use of our website. You will be able to navigate around our website and we'll remember the pages you visited so you can easily find and reach them again
Permanent Cookies	A Cookie that will be permanently stored on your device and will remember information each time you revisit a website	These Cookies will allow you to save login details for your next visit. These cookies are enabled through your web browser, not our website. You can view your Permanent Cookies within your web browser settings
Targeted Cookies	A Cookie that will remember the things you're interested in on our website and remind you of these things through targeted adverts, sent via third-party platforms	After you have visited our website we may send you personalised adverts via third-party platforms such as Facebook, Google or LinkedIn. These adverts are delivered to you so we can continue to engage with you and display new opportunities that may be of interest
Site Analytic Cookies	A Cookie that will allow anonymised analysis of how visitors navigate and use a website	We use Google Analytics to receive anonymised reports on how long visitors stay on our website, whether they apply for jobs and which of our jobs and web pages are getting the most views and interactions. This information allows us to improve user experience and make sure the content is relevant and interesting

Third-party Cookies	A Cookie that will appear in third-party embedded content on a website, enabling the third-party to monitor engagement with that content	We may embed third-party content onto our websites if we believe it is of interest to our website visitors or to improve their experience. This third-party content will carry a Cookie so that the content owner can measure how many people are engaging with that piece of content. We don't control the settings of these Cookies. We recommend you check the third-party websites for more information about their cookies policy and how to manage them
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Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, please refer to our Cookie policy.

7. Login 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

The Company's website may contain links to other external websites. Please be aware that the Company is not responsible for the privacy practices of such other sites. When you leave our site we encourage you to read the privacy statements of each and every website that collects personally identifiable information. This privacy statement applies solely to information collected by the Company's website.

9. Sale of business

If the Company'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. Where the sale of the business results in the transfer of your details to a different data controller we will notify you of this.

10. Data Security

The Company takes every precaution to protect users' information. Security measures in relation to the personal data processed, e.g. firewalls, browser certification technology, encryption, limited access, use of passwords are in place to help protect your data.

Only employees who need the information to perform a specific job (for example, consultants, our accounts clerk or a marketing assistant) are granted access to your information.

The Company uses all reasonable efforts to safeguard your personal information. However, you should be aware that the use of email/ the Internet is not entirely secure and for this reason the Company cannot guarantee the security or integrity of any personal information which is transferred from you or to you via email/the Internet.

If you share a device with others, we recommend that you do not select the "remember my details" function when that option is offered.

If you have any questions about the security at our website, you can email our compliance manager – details on our website.

11. Changes to this privacy statement

We will update this privacy statement 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 notice or any of the procedures set out in it please contact: our compliance manager, details on our website.

You also have the right to raise concerns with the Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/make-a-complaint/>, or any other relevant authority should your personal data be processed outside of the UK and you believe that your data protection rights have not been adhered to.

Annex A

a) The lawfulness of processing conditions for personal data are:

1. **Consent:** the individual has given clear consent for you to process their personal data for a specific purpose.
2. **Contract:** the processing is necessary for the performance of a contract with the data subject or in order to take specific steps before entering into a contract.
3. **Legal obligation:** the processing is necessary for compliance with a legal obligation to which the data controller/data processor is subject to.
4. **Vital interests:** the processing is necessary to protect someone's life.
5. **Public task:** the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official functions, and the task or function has a clear basis in law.
6. **Legitimate interests:** the processing is necessary for the legitimate interests pursued by the data controller or a third party, unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

b) The lawfulness of processing conditions for special categories of personal data are:

1. The data subject has given explicit consent to the processing of the special categories of personal data for one or more specified purposes, except where the data subject is not permitted or able to give consent.
2. Processing is necessary for carrying out obligations and exercising specific rights of the data controller or of the data subject under employment, social security or social protection law, in so far as it is authorised by UK law or a collective agreement, provided for appropriate safeguards for the fundamental rights and interests of the data subject.
3. Processing is necessary to protect the vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent.
4. Processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the data subject(s).
5. Processing relates to personal data which manifestly made public by the data subject.
6. Processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity
7. Processing is necessary for reasons of substantial public interest on the basis of UK law which is proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and interests of the data subject domestic law.
8. Processing is necessary for the purposes of preventative or occupational medicine, for assessing the working capacity of the employee medical diagnosis, the provision of health or social care or treatment or management of health or social care systems and services on the basis of UK law or a contract with a health professional and subject to relevant conditions and safeguards.
9. Processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices on the basis of UK law.
10. Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and interests of the data subject.