

PRIVACY POLICY

iCare 24 Group of companies consist of several recruitment businesses which provide work-finding services to its clients and work-seekers. These include iCARE24 Limited, Vitality24 Limited and Raven Medical Limited. The Company must process personal data (including sensitive personal data) so that it can provide these services – in doing so, the companies act 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 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 the terms of the following statements.

1. Collection and use of personal data

Purpose of processing and legal basis

The Company 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. The legal bases we rely upon to offer these services to you will be outlined in your privacy notice and will depend on how we received the data but also on what basis we intend to use it.

Below are the 6 legal bases:

<u>Consent</u>

When you provide formal consent to process/share your data.

Legitimate Interest

When we have a legitimate interest to contact you e.g. Received your details via a Referral/Job Boards (Relevant to your current role)/ Social Media (Relevant to your current role) etc.

Legal Obligation

When we have a formal legal obligation to share your personal data. e.g., HMRC/Home office, more information can be found on our website under "Record Keeping Table".

Contractual Obligation

If we need to process/share your data to fulfil our contractual obligation. e.g., NHS Frameworks in order to provide you with work finding opportunities.

Vital Interest

When we need to process your data due to a Vital Interest e.g., Life or death situation.

Public Interest

When we need to process/share your data to perform a specific task in the interest of the public. e.g., exercising office authority, (a public body's tasks, functions duties or powers which is laid down by law.)

2. Overseas Transfers

The Company may transfer only the information you provide to us to countries outside 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.



3. Data retention

The Company will retain your personal data only for as long as is necessary in order to fulfil our duty to provide/inform you with work finding opportunities. Different laws 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 from (a) the date of their creation or (b) after the date on which we last provide you with work-finding services.

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.

4. Your rights

Please be aware that you have the following data protection rights. If you wish to fulfil any of the below, please visit our Data Protection – GDPR section on our website <u>www.icare24.co.uk</u>:

- The right to be informed about the personal data the Company possesses on you;
- The right of access to the personal data the Company possesses 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

5. How your data is used

Personal Data

The personal data we collect, use, store & transfer about you will be relevant for the iCare 24 Group to find you work opportunities, information as follows:

- [Name]
- [Date of birth]
- [Contact details, including telephone number, email address and postal address]
- [Experience, training and qualifications]
- [CV]
- [National insurance number]
- Professional Registrations
- Nationality/ID
- Proof of address
- Work references
- Photo
- Bank details
- Customer service history (interaction via phone/website/social media etc.)
- [Any other personal data required/relevant for your registration]



Sensitive personal data

- Disability/health condition/health records relevant to the role
- Criminal conviction/ DBS records including DBS update service
- Any other sensitive personal data required for my registration

This data will be managed securely, please refer to our data protection policy for more information <u>www.icare24.co.uk</u>

If you don't provide personal data

You do not have to give us any of your personal data however we will not be able to process an application for you to allow you to seek work opportunities. We will require personal data to perform to our contract & legal obligation.

Keeping your personal data up to date

It is important that the personal data we hold about you is accurate and current, please keep us informed about any changes. You can do this by making a request of rectification via our website <u>www.icare24.co.uk</u>

Recipients of processing/sharing personal data

- NHS Frameworks which include Health trust Europe (TWS), CPP, CCS (HSR) or any additional frameworks in the future to fulfil our work finding services.
- Neutral Vendors (Virgin Care, GRI, Neuven, Comensura, Datumpro or any additional Neutral Vendors to fulfil our work finding services
- NHS Hospitals & Private Hospitals/Care homes/Nursing Homes/Hospices/Walk in centres/ GP surgeries & any other clients to fulfil our work finding services.
- Auditors (Neuven Solutions, company accountant (Murphy Salisbury) & any other Auditors required to fulfil our legal/contractual obligations.
- Umbrella company (And additional payment service providers)
- CRB Provider (Ucheck) or any other future providers
- Healthier Business (Fitness to work/ Training provider
- Health & Safety Group (or any other training providers)
- HMRC/Home office/ Solicitor (any other legal or contractual obligation
- Pension provider (True potential wealth management or any other future provider
- Website/ Marketing providers
- iCare 24 Group of companies (iCARE24 Limited, Vitality 24 Limited and Raven Medical Limited, and any future companies' part of the group.)
- Credit reference agencies, law enforcement & fraud prevention agencies
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based who provide consultancy, banking, legal, insurance and accounting services.
- Order packers/ Delivery companies
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

Any information that is processed/shared to third parties is required to be respected and in accordance with our instructions.



Keeping your data secure

We are committed to ensure that your data is stored securely. The iCare 24 Group have implemented changes within our business to increase our security measures to prevent your personal data from being lost, used or accessed in an unauthorised manor. We use a CRM system called RDB pro-net which has a backup server. This is protected by firewalls, support service, antivirus. We have internal security levels which limits access to your personal data to certain employees who need to process/share your data to fulfil their role. (please refer to our data protection policy on our website <u>www.icare24.co.uk</u> for more information.)

How long will we keep your data for?

• We will only retain your personal data for as long as necessary to fulfil our duties as a recruitment company. You can refer to our "Record Keeping Table" on our website <u>www.icare24.co.uk</u> which will outline details of the length of time we need to keep certain documents/records.

6. Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it, please contact:

Data Protection Officer – Bobby Swali email <u>data@icare24.co.uk</u>, Tel: 08448236888 Data Protection Lead – Scott Lintern, email <u>data@icare24.co.uk</u>, Tel: 08448236888

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