



Rapha Healthcare Privacy Policy

1. Introduction

This privacy notice (“**notice**”) applies to the processing of personal data by Rapha Healthcare Services Ltd in connection with any:

- “occupational health services”: provision of occupational health services including pre-placement health screening, health surveillance, sickness absence management, vaccinations and ongoing occupational health consultancy services to actual and prospective clients, and including the provision of temporary workers or contractors to provide occupational health services to the actual and prospective clients;
- “recruitment services”: provision of recruitment services including placing candidates into permanent, temporary and contract roles with actual and prospective clients; and
- “travel health services”: provision of travel-related medical advice and services before, during and after travel;
- “supplier services”: provision of products and services to Rapha Healthcare Ltd by suppliers or service providers.

2. Key terms

References in this notice to “Rapha Healthcare”, “**we**”, “**us**” or “**our**” are references to Rapha Healthcare Ltd. Rapha Healthcare Ltd is a limited liability company established under English Law whose registered office is at 11 Woodwicks, Maple Cross, Rickmansworth, WD3 9TL

- i. References in this notice to “**you**” or “**your**” are references to individuals whose personal data Rapha Healthcare processes in connection with occupational health services, recruitment services, and/or travel health services.
- ii. Any references in this policy to our “**clients**” or “**suppliers**” includes their employees or other staff whose personal details we process.
- iii. “Personal data”: includes any information about an individual from which that person can be identified.
- iv. “Special categories of personal data”: includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political

opinions, trade union membership, information about your health and genetic and biometric data.

3. Purpose of this notice

We take your privacy very seriously. This notice aims to give you information on how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or our supervisory authorities in the event you have a complaint.

4. Who is responsible for your personal data?

We collect, use and are responsible for the personal data we process about you. When we do so, we are subject to the [General Data Protection Regulation](#), which applies across the European Union (including in the United Kingdom) and we are responsible as ‘controller’ of that personal data for the purposes of those laws.

A “**controller**” is a person or organisation who alone or jointly determines the purposes for which, and the manner in which, any personal data is, or likely to be, processed.

Unless we notify you otherwise, Rapha Healthcare acts as controller for all your personal data. Our contact details are as follows:

Rapha Healthcare Ltd
Unit 7-7A, 6 Greenhill Crescent, Watford Business park, Watford Wd18 8QU
Email: occupationalhealth@raphahealthcare.co.uk
Telephone: +44 0192 819510/0749 513 0405

5. How to make a complaint about the use of your personal data by us

If you have any concerns or would like to make a complaint about our processing of your personal data, we would encourage you to contact us in the first instance as we aim to promptly, efficiently and satisfactorily resolve any concerns or complaints you may have.

The General Data Protection Regulation also gives you the right to lodge a complaint with a supervisory authority, in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who can be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

6. The personal data we collect about you

We may collect and use the following personal data about you:

- “**Identity Data**”: including your first name, middle names, maiden name, last name, marital status, title, date of birth, national insurance number, passport details and gender;
- “**Contact Data**”: including your billing address, delivery address, home address, email address and phone number;

- **“Financial Data”**: including your bank account and payment card details, payroll details, HMRC data, pension scheme details, statutory payments;
- **“Professional Data”** including your job title, CV/work history, job preference (including role, geographical areas and preference), email address, phone number and professional interests;
- **“Marketing and Communications Data”**: including your marketing and communication preferences;
- **“Professional History”** including your previous positions and professional experience, references;
- **“Special Categories of Personal Data”** including your health conditions, health history, immunisation records and results of blood tests;
- **“Criminal Offence Data”** meaning all criminal information disclosed in a Disclosure and Barring Check report.

7. If you fail to provide personal data to us

Where we need to collect personal data by law for (instance, in relation to health and safety checks or other recruitment checks) or under the terms of a contract we have with you and you fail to provide the personal data when requested, we may not be able to perform the contract we have or are trying to enter with you. In this case, we may have to decline to provide or receive the relevant service(s).

8. How your personal data is collected

We use different methods to collect personal data and special categories of personal data from and about you, including through the channels set out below.

- Directly from you:** You give us your personal data which includes your Identity Data, Contact Data, Financial Data, Professional Information, Marketing and Communications Data, Special Categories of Personal Data, and Criminal Offence Data in your direct interactions with us (a) by filling forms with us (b) by filling forms on our website including our “Contact Us” page, (c) by corresponding with us by email or post, (d) by speaking to us in person or over telephone, or (e) whilst visiting our offices. Such direct interactions include, for example, instances when you:
 - give us your business card at an event;
 - leave your contact information on our telephone answering system;
 - participate in our marketing, recruitment or other promotional events;
 - give us feedback (for example by completing a survey).
- From third party sources:** For example, we receive Identity Data, Contact Data, Financial Data, Professional Information, Special Categories of Personal Data and Criminal Offence Data from third parties for instance
 - through disclosure and barring reports from the Disclosure and Barring Service;
 - from our clients, (who are your employers), when we provide occupational health or recruitment services to them.

- from interactions with government or regulatory bodies or other authorities in relation to you or on your behalf.
- iii. **From publicly available sources.** We may collect personal data from publicly available sources including any services accessible on the internet which you are using for professional networking purposes e.g. LinkedIn.

9. How and why we use your personal data

- iv. We will only process or use your personal data when the law allows us to, that is, when we have a legal basis for processing. Section 10 (Purposes and legal basis for which we will use your personal data) below sets out further information about the legal bases that we rely on to process your personal data. We use your personal data in the following circumstances:
- v. **“legal or regulatory obligation”**: where we need to comply with legal and regulatory obligations that we are subject to;
- vi. **“performance of a contract”**: where we need to perform a contract which we are about to enter into or have entered into with you or our clients or to take steps at your request before entering into a contract;
- vii. **“legitimate interests”** where necessary for our interests (or those of a third party) so long as your fundamental rights do not override such interests. We make sure that we consider and balance any potential impact on you and your rights before we process your data for our legitimate interests; and
- viii. **“consent and explicit consent”**: where you have provided consent or explicit consent to processing your personal data.

With limited exceptions, for instance, in relation to some of our marketing activities, we do not generally rely on consent as the legal basis for processing your personal data. You have the right to withdraw your consent at any time to marketing by contacting us through the contact details provided.

10. Purpose and legal basis for which we will use your personal data

The table below sets out a description of the ways in which we use your personal data and our reasons for doing so. We may process your personal data for more than one reason depending on the purpose for which we are using your personal data. Please contact us using the contact details provided if you need details about the specific legal basis we rely on to process your data where more than one ground has been set out in the table below.

In relation to our occupational health, recruitment or travel health services and related services:

<p>Purpose and/or activity</p>	<ul style="list-style-type: none"> • For the purposes of providing recruitment services to you • pursuant to a contract of services, • including finding suitable work for you which includes introductions to and placements with suitable hirers, • keep you informed of available opportunities as they arrive, to match your skill set with job vacancies to assist in finding suitable positions, • to put in place contractual arrangements and documentation once a role has been secured for you.
<p>Type of data</p>	<p>Identity data, Contact data, Financial Data, Professional Information, Professional History and Special Categories of Personal Data.</p>
<p>Legal basis for processing</p>	<p>Performance of a contract Legal or regulatory basis Consent and explicit consent Legitimate interests: ensuring that you are provided with the best services we can offer, for the safeguarding of the health and safety of yourself and all individuals you come into contact with whilst performing a contract for services, and securing prompt payment of any fees, costs and debts in respect of our services.</p>
<p>Purpose and/or activity</p>	<p>To comply with legal or regulatory obligations regarding employment in the UK. For instance, to establish you have the right to work in UK, and undertake relevant security and DBS checks as required by our clients and prospective employers.</p>
<p>Type of data</p>	<p>Identity data, Contact data, Special categories of Personal Data, criminal offence data</p>
<p>Legal basis for processing</p>	<p>Legal or regulatory basis Legitimate interests: Ensuring we comply with relevant regulations</p>
<p>Purpose and/or activity</p>	<p>To deliver occupational health services to our clients and to you.</p>
<p>Type of data</p>	<p>Identity data, Contact data, Financial Data, Professional Information, Professional History and Special categories of Personal Data</p>

Legal basis for processing	<p>Performance of a contract</p> <p>Legal or regulatory basis</p> <p>Legitimate interests: ensuring that you are provided with the best services we can offer, to ensure that you are fit to perform the responsibilities of your role and/or to make recommendations to support you in your role as necessary, and for the safeguarding of the health and safety of yourself and others</p>
Purpose and/or activity	To manage remunerations and payments due to you and to collect and recover payments, fees and charges owed to us
Type of data	Identity data, Contact data, Financial Data
Legal basis for processing	<p>Performance of a contract</p> <p>Legitimate interests: ensuring we can manage payments due to you and collect and recover money owed to us</p>
Purpose and/or activity	To interact with governmental or regulatory bodies or other authorities in relation to you, including gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies.
Type of data	Identity data, Contact data, Financial Data, Professional Data, Professional History
Legal basis for processing	<p>Legal or regulatory obligation</p> <p>Public interest</p>
Purpose and/or activity	To manage our relationship with you which will include updating our client records and notifying you about changes to our terms of business or this notice
Type of data	Identity Data, Contact Data, Marketing and Communications Data
Legal basis for processing	<p>Performance of a contract</p> <p>Legal or regulatory obligation</p> <p>Legitimate interests: ensuring we can notify you about changes to our terms of business or this notice.</p>

Purpose and/or activity	To manage and protect our business, including data security, troubleshooting data and systems, system maintenance and testing, data hosting, managing our offices and other facilities
Type of data	Identity Data, Contact Data, Marketing and Communications Data, Professional Data
Legal basis for processing	Legal or regulatory obligation Legitimate interests: to ensure the efficient and secure running of our business, in order to be as efficient as we can, so we can deliver the best service for you at the best price. This includes maintaining information technology services, network and data security and fraud prevention

11.Promotional communications

We may use your personal data to send you updates (by email, text message, telephone or post) about our services, for feedbacks, your records.

We will not use your personal data to send you marketing materials if you have requested not to receive them. If you request that we stop processing your personal data for marketing purposes, we shall stop processing your personal data for those purposes.

We have a legitimate interest in processing your personal data for promotional purposes which means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal data with the utmost respect and never share it with other organisations. You have the right to opt out of receiving promotional communications at any time by contacting us at the contact details provided. See Section 4 for the contact details.

12.Processing your data if you are not our client

If you are not our client, we may need to process your personal data in order to provide client services to our client, including the provision of occupational health services and health-related advice. We will process your personal data in these circumstances as:

- i. this is our legitimate interests, our client's legitimate interests or those of another third party: and/or
- ii. we may be required to process that personal data to comply with our legal or regulatory obligations. If you have any questions about how we will process your personal data, please contact us using the contact details provided. See Section 4 for the contact details.

13.Who we share your personal data with

We may have to share your personal data with the entities and persons set out below for the purposes for which we collected the data as detailed in Section 9 (How and why we use your personal data) and Section 10 (Purposes and legal basis for which we will use your personal data). Where required we may share your personal data with:

- our clients e.g. where we are providing occupational health services to you as an employee of our client.
- entities approved by you in relation to the occupational health, recruitment services or travel health services that we provide. For instance, where we seek to assign your services to a hiring company.
- our professional advisors or consultants, including lawyers, bankers, auditors, accountants and insurers providing consultancy, legal, banking, audit, accounting or insurance services to us;
- any financial institutions providing finance to us;
- service providers who provide information technology and system administration services to us;
- external auditors who may carry out independent checks of our files as part of our accreditations;
- other third parties we use to help us run our business, e.g. marketing agencies or website hosts;
- law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations; and
- third parties approved by you in relation to services we provide to you.

We only allow our service providers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on service providers to ensure they can only use your personal data to provide services to us and to you.

14. Where your personal data is held

Your personal data may be held at our offices and those of our clients, service providers, representatives and agents as described above. See Section 13 (Who we share your personal data with).

15. How long your personal data will be kept

We will only keep your personal data for as long as necessary to provide services to you and our clients. Thereafter, we will keep your personal data for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly;
- to keep records required by law; and
- to satisfy any legal, regulatory, accounting and reporting requirements.

We will not retain your personal data for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of personal data. If you would like to know more about the retention periods we apply to your personal data, please contact us at the contact details provided. See Section 4 for the contact details.

16. Your rights

You have the following rights, which you can exercise free of charge:

- i. **Right to be informed**– the right to be informed about how we will use and share your personal data.
- ii. **Right of access** – the right to be provided with a copy of your personal data.
- iii. **Right to rectification and data quality** – the right to require us to correct any mistakes in your personal data. If we have disclosed the relevant personal data to any third parties, we will take reasonable steps to inform those third parties of the rectification where possible.
- iv. **Right to erasure including retention and disposal** – the right to require us to delete your personal data—in certain situations.
- v. **Right to restrict processing** - the right to require us to block the processing of your personal data in certain circumstances, for instance if you are disputing the accuracy of the personal data.
- vi. **Right to data portability** - the right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations.
- vii. **Right to object to processing of personal data in certain circumstances including where personal data is used to marketing purposes** - the right to object to processing carried out by us if (a) we are processing personal data based on legitimate interests or for the performance of a task in the public interest (including profiling), (b) if we are using personal data for direct marketing purposes, or (c) if personal data is being processed for scientific or historical research or statistical purposes.
- viii. **Right not to be subject to automated decisions where the decision produces a legal effect or similarly significant effect** - the right not to be subject to a decision based on automated processing where the decision will produce a legal effect or a similarly significant effect on you.

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights under the General Data Protection Regulation](#).

You may exercise any of your rights at any time using the contact details set out at Section 4 above. You will not have to pay a fee to access your personal data or to exercise any of the other rights. However, we may charge a reasonable fee if your request is clearly unfounded or unreasonable.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of

your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one calendar month. Occasionally it may take us longer than one calendar month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

17. Keeping your personal data secure

18. We implement appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully including:

- a. limiting access to your personal data to those who have a genuine business need to access it.
- b. ensuring that those processing your personal data will do so only in an authorised manner and are subject to a duty of confidentiality.
- c. ensuring that those who have permanent or regular access to personal data or that are involved in the processing of personal data, or in the development of tools used to process personal data are trained and informed of their rights and responsibilities when processing personal data.
- d. regularly testing, assessing and evaluating the effectiveness of our technical and security measures for ensuring the security of the processing.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

19. Changes to this privacy policy

This privacy notice was published on 25th May 2018. We may change this privacy notice from time to time—when we do we will inform you via our website and/or by email.

20. How to contact us

Please contact us by post, email or telephone if you have any questions about this privacy policy or the personal data we hold about you. See Section 4 above for our contact details.