



## **Privacy Statement**

The following statement sets out the privacy notice in relation to InHealth Group Limited including C7 Health Limited, TAC Healthcare Group Limited, Diagnostic World Limited, and Private GP Services (UK) Limited.

We are committed to protecting your privacy and personal data.

When you apply for a job with us we collect information from and about you. Some of the information we collect may be classed as personal data under data protection legislation, that is, "any information relating to an identified or identifiable natural person". This Privacy Statement explains how and why we collect personal information about our candidates ("you"). It also explains how and why we use it, the conditions under which we may disclose it to others and how we keep it safe.

#### Who we are

We are InHealth Group Limited, registered in England & Wales under company number 04620480 with our registered office at Beechwood Hall, Kingsmead Road, High Wycombe, Bucks HP11 1JL. Any questions regarding this Privacy Statement and our privacy practices should be sent by email to <u>dataprotection@inhealthgroup.com</u>

#### What type of information we collect

As a data controller, the personal information we collect, store and use may include:

- Your name, postal address, email address and telephone number
- The name of the companies you work or have worked for, your current role and past positions
- If you are applying for a position with us, we will collect the information contained in your CV, opinions of named referees, your qualifications, remuneration package and the output of interviews and conversations we may have had with you
- Email or other correspondence we enter into with you
- In some cases, we need to process data to ensure we are compliant with our legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts
- IP address, and information regarding the parts of our website you have accessed and when.
- We may sometimes collect your special categories of data, including:
- Information about your health if we need to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out obligations and exercise specific rights in relation to employment.
- Information you may disclose about yourself during a meeting or interview relating to your racial or ethnic origin or political or religious beliefs.





### How we collect information about you

We collect information about you:

- From you. When we interact with you online, over the phone, face to face or in writing during the recruitment process.
- From other people. For example, named referees or industry sources.

#### How your information is used

We may collect and process your personal information in order to fulfil our vacancies and for our legitimate business interests. We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Where you have provided your consent.

We have a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows us to manage the recruitment processes, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. We may also need to process data from job applicants to respond to and defend against legal claims.

We may use your information to:

- Process a job application you have submitted
- Assess your skills, qualifications, and suitability for the role you've applied for
- Respond to a request for contact you have submitted through our website or by other means (e.g. email, telephone or writing)
- Contact you regarding information about a new job vacancy or professional opportunity that we believe will be of interest to you
- Confirm your suitability for a job application through referencing and background check
- Confirm the suitability of candidates through referencing

Whenever we process data for these purposes we will act with the highest regard to your privacy rights. You have the right to object to this processing if you wish. Should you wish to do so please contact us. Please bear in mind that if you object, this may affect our ability to carry out the tasks above for your benefit.

Please also be aware that if you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully.







For example, if we require a DBS or other checks or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

### Who may have access to your information

We will not sell or trade in your information, and we will not share your information with third parties for marketing purposes.

Your personal data is securely stored on locations which are strictly governed by our data security framework. This provides appropriate organisational and technical security measures to prevent unauthorised access or unlawful processing of your personal data and to prevent personal data being lost, destroyed or damaged. We continually strive to ensure our data security framework offers a robust defence against breaches of data security including through audits. We are accredited with ISO9001 Quality Management System and ISO27001 Information Security Management Standard.

We will not transfer your personal data outside the United Kingdom unless:

- The country in question has been deemed by the European Commission or United Kingdom to provide an adequate level of protection for personal data; or
- One of the mechanisms set out in the legislation has been put in place, e.g. where one of the 'appropriate safeguards' listed in data protection legislation has been put in place or a specific exception applies.

Your information will be shared internally for the purpose of the recruitment. This includes members of the People Services and recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles. We may share your personal data as follows:

- Third party processors: When you apply for a position we have advertised with a recruitment job board or agency, your application is processed by them and shared with us. These entities are also required to process your data in compliance with data protection regulation and should be contacted directly with any queries regarding their privacy principles.
- Affiliates. We may share some or all of your personal data with our affiliates, in which case we will require our affiliates to comply with this Privacy Statement.
- Corporate Restructuring. We may share personal data when we do a business deal, or negotiate a business deal, involving the sale or transfer of all or a part of our business or assets. These deals can include any merger, financing, acquisition, or bankruptcy transaction or proceeding.
- Other Disclosures. We may share personal data as we believe necessary or appropriate: (a) to comply with applicable laws; (b) to comply with lawful requests and legal process, including to respond to requests from public and government authorities to meet national security or law enforcement







requirements; (c) to enforce our Privacy Statement; and (d) to protect our rights, privacy, safety or property, and/or that of you or others.

In all cases, we will take steps with the aim of ensuring that your privacy rights continue to be protected, for example, that appropriate agreements are in place. All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

#### How we store your data

We will store your data in as few places as practicable to ensure the data is efficiently managed and to minimise security risks. Your data may be stored on our proprietary database, email and company servers or on paper. We will not use your data for any purpose other than the recruitment exercise for which you have applied as described in this Privacy Statement.

If your application for employment is unsuccessful, we will hold your data on file for 180 days after the end of the relevant recruitment process. If you agree to allow us to keep your personal data on file, we will hold your data on file for a further 180 days, or such other period as may be required by law, for consideration for future employment opportunities. At the end of that period, or once you withdraw consent, your data is deleted or destroyed. We may ask for your consent before keeping your data and you are free to withdraw your consent at any time.

### Your choices and rights

Under certain circumstances, you have the right to:

- Request access. You have the right to ask us for a copy of the information we hold about you, and further details about how your personal data is processed and with whom it is shared. The request must be made in writing and will require you to supply acceptable identification. We undertake to provide a response within 30 days of receiving your request and proof of your identity. In some circumstances it may not be possible to release some or all of the information. In this case, we will provide you with a valid reason why we cannot release it, within the 30 day period.
- Request correction. The accuracy of your information is important to us. If you wish to inform us of any changes to your information or you believe any information we hold is inaccurate, incomplete or out of date, please contact us so we can make the necessary changes. In the unlikely event we are unable to comply with your requested changes, we will provide you with a valid reason.
- Request erasure. You can also, where appropriate, have your personal information erased, or ask us to stop or limit our processing of it.
- Object to processing. Where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the







right to object where we are processing your personal information for direct marketing purposes.

- Request the restriction of processing. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.
- Right to withdraw consent. If we process personal data based on your consent, you have the legal right to revoke such consent at any time. We will then cease the relevant processing activity going forward.

If we have shared your information with a third party, we will inform them of your request so that they may make suitable amendments to their records.

Should you wish to contact us for any of the above reasons, please do so in writing by email at dataprotection@inhealthgroup.com providing us with your name and address, how to contact you and brief details of the reason: for example, the information you would like a copy of, or which you would like to be changed. If you are not satisfied with our response or believe we are not processing your personal data in line with the law, you can make a complaint to the UK supervisory authority, the Information Commissioner's Office at:

Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF Helpline number: 0303 123 1113 ICO website: https://www.ico.org.uk

#### How we protect your personal information

When we collect and process your personal information, we take steps to ensure that it is treated securely. We believe that we have appropriate policies, procedures and technical measures to help prevent any unauthorised access, improper use or disclosure, unauthorised modification and unlawful destruction or accidental loss in relation to personal information under our control. We have also put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so. Communications over the internet, such as emails, are not secure unless they have been encrypted, and may route through a number of countries before being delivered. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk.

All of our employees who have access to, and are associated with, the processing of your personal information are required to treat it confidentially and with utmost consideration to your privacy rights.

#### Use of 'cookies'

Our website uses cookies – small text files that are placed on your machine to help the site provide a better user experience. In general, cookies are used to retain user preferences, store information for things like shopping carts, and provide anonymised tracking data to third party applications like Google Analytics.







As a rule, cookies will make your browsing experience better. However, you may prefer to disable cookies on this site and on others. If you would like to find out more about cookies, or how you can stop their use in your browser (although please be aware that this may mean that some functions of the site are no longer available to you), please visit www.allaboutcookies.org , or if you would like to view information from Google please visit <u>www.google.com/intl/en/analytics/privacyoverview.html</u>

This Privacy Statement applies only to our careers website. We recommend that you read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you have accessed these using links from our website.

### Profiling

We do not use personal data for the purposes of any automated decision making including profiling.

### Transferring your information outside of Europe

On rare occasions, information which you provide to us may be transferred to countries outside the European Union. By way of example, this may happen if email traffic crosses international borders outside the EU. If we transfer your information outside of the EU, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected.

### **Review of this Privacy Statement**

We may change this Privacy Statement from time to time to make sure it is still up to date and we will notify you if we make any material updates. We may also notify you in other ways from time to time about the processing of your personal information. We keep this Privacy Statement under regular review. This Privacy Statement was last updated in February 2023.