

PRIVACY NOTICE

(for prospective employees, workers and contactors)

Important information about how we use your personal data

We at Elysium Healthcare Limited (“Elysium”) take our data privacy responsibilities very seriously and we are committed to protecting the privacy and security of your personal information.

This privacy notice describes how we will collect and use personal information about candidates and applicants for positions with us. This is done in accordance with data protection law, which means General Data Protection Regulation.

Elysium is the “data controller”. We are responsible for deciding how we hold and use personal information about you. We are required under data protection law to tell you about what information we process about you.

When we talk about personal information we mean information from which you can be identified. It does not include data where the identity has been removed (anonymous data). There are some categories of data that are more sensitive and these require a higher level of protection.

This notice applies to prospective employees, workers and contactors. We may amend it at any time.

Data protection principles

We will comply with data protection law. This says that personal information we hold about you must be:

- used lawfully, fairly and in a transparent way;
- collected for valid reasons that we have explained to you and not used in any way that is incompatible with that;
- relevant to the purposes we have told you about and limited only to those processes;
- accurate and kept up to date;
- kept only as long as necessary for the purposes we have told you about; and
- kept securely.

The kind of information we hold about you

We may collect, store, and use personal information about you in connection with your job application or recruitment to Elysium. This may include:

- Recruitment information, such as CVs, application forms, cover letters or information provided and documented during the interview process
- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses
- Copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process
- Documentary proof of qualifications, professional registrations and relevant training courses

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions
- Trade union membership
- Information about your health, including any medical conditions, disabilities and your health and sickness records
- Genetic information and biometric data
- Information about criminal convictions, offences and court orders

How is your personal information collected?

We typically collect personal information about prospective employees, workers and contactors through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies.

How we will use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform the contract we have entered into with you or because you have asked us to take specific steps before entering into a contract.
- Where we need to comply with a legal obligation.
- 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.

We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to protect your interests (or someone else's interests).
- Where it is needed in the public interest.

Situations in which we will use your personal information

We need the categories of information in the list above primarily to allow us to perform our contract with you or take specific steps before entering into a contract and to enable us to comply with legal obligations. In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below.

- Making a decision about your recruitment or appointment.
- Determining the terms on which you may work for us, including salary and compensation, and benefits.
- Checking you are legally entitled to work in the UK.
- Equal opportunities monitoring.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to take specific steps before entering into a contract (such as considering your application or making an offer), or we may be prevented from complying with our legal obligations.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

How we use particularly sensitive personal information

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

- In limited circumstances, with your explicit written consent.
- Where we need to carry out our legal obligations and in line with our data protection policy.
- Where it is needed in the public interest, such as for equal opportunities monitoring, and in line with our data protection policy.
- Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We will use your particularly sensitive personal information in the following ways:

- We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, and to provide appropriate workplace adjustments.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.
- We will use trade union membership information to pay trade union premiums, register the status of a protected employee and to comply with employment law obligations.

Do we need your consent?

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

Information about criminal convictions

We may only use information relating to criminal convictions where the law allows us to do so.

We envisage that we will hold information about criminal convictions. Where appropriate, we will collect information about criminal convictions as part of the recruitment process or when we complete DBS checks for our regulatory compliance or we may be notified of such information directly by you. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our data protection policy.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

Data sharing

We may have to share your data with third parties, including third-party service providers and other entities in the group where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

The third-party service providers and the activities carried out by them are set out in the summary box below.

Activity	Third Party
DBS Checks	Capita
Occupational health checks	Fusion Health Medigold Health Spire Healthcare

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.

Sharing your personal information with other entities in the group or other third parties

We will share your personal information with other entities in our group as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data.

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

Security of your data

We will ensure that appropriate measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data. Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

Where we store your personal data

The information we process about you is held securely at the particular site where you work or on our secure servers that we operate within the United Kingdom.

Retention of your records

We will not keep your personal data for longer than is necessary for the purpose. This is to ensure that information is properly managed and is available whenever and wherever there is a justified need for that information. Data is retained for specified periods (depending on the record) under our document retention policy. Records relating to successful candidates will be placed in personnel files. Unless a candidate specifies otherwise, records for unsuccessful candidates are retained for a period of six months, after which time they are confidentially and securely destroyed in accordance with our document retention policy.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information 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** of your personal information. 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.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Data Protection Officer in writing. She may

be contacted at 2 Imperial Place, Maxwell Road, Borehamwood, WD6 1JN or email Data.Subject.Request@elysiumhealthcare.co.uk.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Data Protection Officer. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Data protection officer

We have appointed a data protection officer to oversee compliance with this privacy notice. If you would like to know more about anything we have said here, please write to our Data Protection Officer at 2 Imperial Place, Maxwell Road, Borehamwood, WD6 1JN or email IG.Info@elysiumhealthcare.co.uk. You may also contact her if you are not happy with the way we have handled your personal information.

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.