

# **Staff and Contractor Privacy Notice**

The following Privacy Notice explains how we Sciensus Pharma Services Limited (SPSL) intend to use the information you provide during your employment, along with your rights, our reasons for requesting it and who will have access to it.

The privacy notice below sets out how we process your personal information. This notice is regularly reviewed, and changes made from time to time. Any changes we make will be posted on this page.

We do not carry out automated decision making or make a significant decision based solely on automated processing unless that decision is required or authorised by law.

If you have any questions relating to this notice, please contact our Data Protection officer on

Telephone number: 0800 917 4980 Email Address: DPO@sciensus.com

Address: 107, Station Street, Burton Upon Trent, DE14 1SZ.

We will collect some identifiable information from the use of our Cookies. If you would like to read more about this, please click here

## Where we get your information from

From You – Information you provide during your employment

**Employment Agencies** – Information which was provided during your selection, recruitment and onboarding process

Law Enforcement Agencies – for the purposes of prevention and detection of crime or fraud

Legal - Solicitors, Legal Representatives acting on your behalf

Regulators – Where you have approached them independently to act on your behalf

Third parties - reporting absences, references, medical reports etc

**Social Care and Safeguarding agencies** – to enable us and them carry out our legal obligations for staff safety and care

**HMRC** – for salary information



# How we use your information

We receive your information from many sources to deliver our services to you and we collect and process personal information about you from these sources.

We primarily use your personal information in the following ways:

- To create and maintain electronic employment record
- To allow us to make payments into your nominated bank account
- To record and report to Government bodies e.g. HMRC/NMC/DBS, for legal and statutory compliance
- To record your information on the Government apprenticeship services shared site (only if you are undertaking an apprenticeship course)
- To allow us to manage all types of absences, ascertaining your fitness to work and provide employee wellbeing assistance
- To process and provide employee benefits including financial support & charitable activities
- For purposes of investigations such as disciplinary, grievance and capability proceedings
- Respond to and defend against legal claims and queries
- To process and inform you of any change to the business or your employment (i.e. terms and conditions)
- For regulatory compliance purposes
- To process and provide employment information on your behalf (e.g. employment/mortgage references)
- To monitor attendance at office locations
- To allow us to support personal development and career progression, including training
- To allow and arrange usage of vehicles, public transportation and hotels for company purposes
- To provide you with company benefits (e.g. car lease scheme, company car & benefits portal)
- Vehicle tracking and driver behaviour monitoring (stop/start/idling and braking)
- To set up and manage company credit cards and mobile phone accounts, where required for job role.
- For monitoring and surveillance to ensure safety of our employees and customers
- To capture statistics and analysis trends for governance, compliance and business improvement
- · For planning and managing business activity such as budgets, auditing and accounts
- To conduct employee engagement surveys/ or wellness Questionnaires
- To report crime and fraud
- To comply with Health and Safety obligations
- To manage staff wellbeing



To monitor GPS location of staff whereabouts to schedule appointments efficiently

Please see what personal information we collect on you, including the lawful grounds for us to process your information:

Type of Data

Why do we need this data?

What is our lawful ground for processing?

#### **Personal Data**

- Title and Name
- Address
- Contact details
- Personal Email Address
- Date of Birth
- Gender
- Marital Status
- Dependants
- Next of Kin/Emergency contact details
- Qualifications/Skills
- Vehicle registration number/Driving License Information
- Experience and employment history (including start date and end dates, with previous employers and with us)
- National Insurance
- Bank Account details
- Payroll records/tax status/pension and Insurance information
- Unique identification reference numbers and names e.g. payroll number, username, passwords, PINs
- Salary
- annual leave and other absences
- pension & benefits
- Personal financial situation (financial benefit)
- 1-2-1 and performance meetings
- Grievance and Disciplinary information
- Information about your use of our information and IT systems
- HMRC employment checks
- Right to Work information

Your contract of employment is a contact between you and SPSL. This data is used to set up and maintain your employment with us. Process and respond to your requests and incidents. To ask you to confirm your identity for security clearance.

Article 6 (B) Performance of a Contract processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;

#### Article 6 (C) Legal Obligation

processing is necessary for compliance with a legal obligation to which the controller is subject

PAR4910724 Implementation Date: 10/07/2024



<ul> <li>Details of your schedule (days of work and working hours) and attendance to work</li> <li>Location data (vehicles)</li> <li>Safeguarding referrals (staff name and contact details)</li> <li>Mandatory Health vaccinations</li> </ul>		
CCTV/Swipe Card	For the prevention and detection of crime  To comply with Health and Safety requirements  To monitor compliance with contractual obligations  To monitor attendance at office locations	Article 6 (F) Legitimate Interest processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child
Special categories Information		
Criminal Offence data/DBS checks	Entering into a contract for employment purposes and assessment for continuing suitability for employment	Article 6 (B) Performance of a Contract processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
Equal opportunities monitoring Information including Information about your ethnic origin, race, ethnicity, sexual orientation, religion or belief	For analysis purposes, as required by our regulator and to provide information on extra services we provide. It is also a legal requirement for us to require this information under Equal Opportunity Act 2010.	Article 6 (B) Performance of a Contract processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;  Article 6 (C) Legal Obligation
		processing is necessary for
		compliance with a legal obligation to which the controller is subject
<ul><li>Medical or health conditions</li><li>Whether you have a disability</li></ul>	Your contract of employment is a contact between you and SPSL. This data is used to set up and maintain your employment with us. This information may also be	Article 6 (B) Performance of a Contract processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data

PAR4910724 Implementation Date: 10/07/2024



processed where it is relevant to an IT request.

Subject prior to entering into a contract;

Article 6 (C) Legal Obligation processing is necessary for compliance with a legal obligation to which the controller is subject

# How we keep your information Safe

During your service with us, we collect lots of personal and sensitive information about you, and we take keeping your data safe very seriously. To accomplish this, we have our own expert teams and use a mature information security management system so that your data will be treated appropriately and won't end up in the wrong hands. To achieve this, we use a three-layered approach: People, Processes and Technology.

We use a number of technology systems to control how your data is accessed and secured. Our technology covers multiple levels of our systems to ensure we can control your data from end to end. All our users are trained in the best ways of handling personal data and confidentiality and follow strict policies and procedures to ensure security is kept to a high level.

We operate role-based access control which means users access to your personal information is limited dependant on the task they carry out as part of their role.

We test our systems regularly using both internal and external testers and auditor to ensure weaknesses are identified and rectified.

In all our operations we will:

- Keep your information confidential
- Staff and third parties attend annual Data Protection training
- Only share your information with authorised and vetted third parties, agencies or people
- Use it lawfully, fairly and in a transparent way
- Keep your personal information for as long as necessary for the purposes we have told you about
- Protect your data and keep it secure
- Have contractual obligations for data management and protection when outsourcing functions to third parties to process your personal information on our behalf
- · Carry out security and cyber security checks

# Who we will share your information with

We want to maintain your trust and protect your personal information, and when we share your personal information we are doing so because it is essential to enable us to provide a service to you.



In "Where we get your information from" section we have detailed the sources from which we may receive personal information about you, but we also share your personal information with the same sources, including partners and suppliers which work on behalf of us.

- Partners or Contractors who carry out functions on our behalf
- Legal Solicitors or Legal representatives acting on your behalf
- HMRC Payroll and tax code Information
- Law Enforcement Agencies for the purposes of prevention and detection of crime or fraud
- Other third parties who require access to your personal information for specific and limited purposes.
- Other People You have authorised to act on your behalf

In exceptional circumstances and to meet specific service requirements, data may be held outside the United Kingdom and European Union but only where we have appropriate security controls in place with a company contracted to work with us.

# How long we keep your information for

We will only hold your information for as long as it is needed to able us to provide a service to you and in line with our retention schedule, which is aligned with the NHS Code of Practice and other Legal & Regulatory guidance.

We may hold onto your data for longer due to meet the following:

Necessary or required to meet Legal or Regulatory requirements

Resolve disputes and grievances

Prevent fraud and abuse

Enforce terms and conditions

We may keep an anonymised form of your personal data, which will no longer identify you, for statistical, research and analysis purposes without time limits, to the extent we have a legitimate and lawful interest in doing so

# **Your Rights**

You have a number of rights regarding how we use your data including the Right to: Access, Rectify, Erase, restrict, transport, and object to the processing of your personal information.

These rights will not all apply in every situation but to exercise them at any time, have a complaint or just have a question contact us on the following:

Information Governance & Security Team

Telephone number: 0800 917 4980 Email Address: DPO@sciensus.com

Address: 107, Station Street, Burton Upon Trent, DE14 1SZ.

PAR4910724 Implementation Date: 10/07/2024



#### Your right of access

You have the right to ask us for copies of your personal information we hold on you, whether in paper or electronic form. Each request will be dealt with on an individual basis.

## Your right to rectification

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

## Your right to erasure

You have the right to ask us to erase your personal information in certain circumstances.

## Your right to restriction of processing

You have the right to ask us to restrict the processing of your information in certain circumstances, including automated processing and profiling and where automated processing operations are taking place for human intervention.

### Your right to object to processing

You have the right to object to the processing of your personal data in certain circumstances.

## Your right to data portability

You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances where it is technically feasible. This is not an absolute right and may not be possible on all occasions.

#### Your right to complain to the data protection regulator

You also have a right to lodge a complaint with the relevant data protection regulator if you believe your personal data is not being processed in accordance with applicable data protection law. To contact the Information Commissioners Office Click Here.

The Information Commissioners Office normally ask you to raise your concerns firstly with us, but it is important you know you can go directly to the Regulator in the first instance.