



PRIVACY NOTICE

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1 General

RIG Medical Recruit Limited and RIG Locums Limited trading as 'RIG Healthcare' is committed to protecting all personal, special, and criminal categories of data held on you.

As such, RIG Healthcare wants you, the 'data subject', to understand how RIG Healthcare collects, uses, stores, and shares your personal data. RIG Healthcare also wants you to understand what rights you can invoke to help you to protect your privacy. In this regard, it is important that you read this Privacy Notice and understand how RIG Healthcare uses your personal data. Please note that RIG Healthcare reserves the right to update this Privacy Notice as required. The most recent version of this document can be found on RIG Healthcare's website through the following link: <https://www.righealthcare.co.uk/privacy/>

1.1 RIG Healthcare Information

RIG Healthcare is one of the largest suppliers of Locum AHPs, Pharmacists and Doctors to the NHS and has been operating in the healthcare market in the UK for 14 years.

RIG Healthcare is committed to protecting the rights and privacy of individuals in accordance with both European Union and United Kingdom data protection legislation. RIG Healthcare shall lawfully and fairly process personal data about candidates, employees, clients, and other stakeholders to achieve its mission and functions.

If you wish to locate further information on RIG Healthcare, you can find this on the RIG Healthcare website through the following link: <https://www.righealthcare.co.uk/>

1.2 Legislation

All personal data processed by RIG Healthcare is done so in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA).

1.3 Queries and Complaints

If you are unhappy with the way RIG Healthcare handles your personal data and wish to complain, or if you simply want further information about the way your personal data will be used, please contact RIG Healthcare at the below:

Data Protection Officer

RIG Healthcare

Northside House, 69 Tweedy Rd,

Bromley BR1 3WA,

United Kingdom

Telephone: +44 345 363 1187

Email: GDPR@righealthcare.co.uk



You have the right to lodge a complaint with the Data Protection Commission. To contact the Data Protection Commission, please use the following details:

Data Protection Commission

21 Fitzwilliam Square South

Dublin 2

D02 RD28

Ireland

Telephone: +353 (0)761 104 800

Telephone: +353 (0)57 868 4800

Email: info@dataprotection.ie

1.4 Breaches

RIG Healthcare will take all appropriate technical and organisational steps to safeguard your personal data. In the unlikely event of a data breach, we will contact you in line with RIG Healthcare's legal obligations.

2 How Does RIG Healthcare Collect Information?

RIG Healthcare collects personal data to enable the provision of services to support the RIG Healthcare purpose. The following non-exhaustive methods of data collection are an indication of ways in which RIG Healthcare may obtain your information:

- Obtain personal data directly from you;
- Personal data that RIG Healthcare receives from other sources; and
- When entering RIG Healthcare's premises, you will be recorded on CCTV surveillance and the Visitor Sign In tablet/book for security purposes.

It is important that the personal data you provide RIG Healthcare is up to date and accurate. As outlined in Section 7.4 of this notice, if personal data RIG Healthcare holds on you is inaccurate or incomplete, please contact RIG Healthcare and RIG Healthcare will update the information.



3 What Does RIG Healthcare Use Information For?

3.1 Process, Purpose, and Lawful Basis

RIG Healthcare uses personal data collected to fulfil RIG Healthcare’s obligations to provide recruitment services and to enable the provision of services to support RIG Healthcare’s purpose.

RIG Healthcare uses personal data for any of the following purposes:

Process	Purpose	Lawful Basis
Pre-Recruitment	To register a prospective data subject’s interest in recruitment for employment.	Processing is necessary in order to take steps at the request of the data subject prior to entering into a contract. The processing is necessary for the exercise of rights and obligations under employment law.
Recruitment and Selection	To complete the recruitment process and assess data subject suitability.	Processing is necessary in order to take steps at the request of the data subject prior to entering into a contract. Processing relates to RIG Healthcare’s obligations in employment and for assessing data subject’s work capacity.
Pension	To administer data subjects pension entitlements and to comply with pension rules.	To comply with various pension laws. Processing is necessary for the performance of a contract to which the data subject is party.
Payroll	To enable RIG Healthcare to effect payment to the data subject.	Processing is necessary for the performance of a contract to which the data subject is party.
Personnel File	To comply with employment and revenue laws and to ensure that	Processing is necessary for the performance of a contract to which the data subject is party.



	terms and conditions of employment are adhered to.	To comply with various employment and revenue laws. To protect the vital interests of the data subject in the event of an accident or emergency.
Entitlement to Work	To enable RIG Healthcare to achieve compliance with its obligations pursuant to any local legislation governing the entitlement to work.	Processing is necessary for compliance with a legal obligation to which RIG Healthcare is subject.
Time and Attendance Records	To enable the data subject to avail of their rights and entitlement pursuant to the Working Time Regulations 1998.	The processing is necessary for the performance of contract to which the data subject is party.
Statutory Entitlement	To enable RIG Healthcare to achieve compliance with: <ul style="list-style-type: none"> • Its obligation to the data subject; • Record keeping obligations pursuant to a variety of employment law statutes. 	The processing is necessary for compliance with legal obligation to which RIG Healthcare is subject.
Training Records	To ensure that RIG Healthcare is in a position to assess the data subject's training needs and to capture proof of training.	The processing is necessary for the performance of contract to which the data subject is party.
Performance Details	To manage the data subject's performance in accordance with relevant RIG Healthcare policies.	The processing is necessary for the performance of contract to which the data subject is party.
Grievance and Disciplinary	To ensure the data subject's complaints are fairly investigated in accordance with RIG Healthcare policies.	To comply with RIG Healthcare legal obligation to apply fair procedures to any data subject's investigation. The processing is necessary for the performance of contract to which the data subject is party.
Medical Information	To manage the data subject's absences, to manage sick pay in accordance with the contract of employment, and to manage the fitness to work of data subjects.	Processing is necessary to assess, subject to data subject safeguards, the working capacity of the data subject.



		To carry out obligations and exercise rights under employment law.
Making or Receiving Payments	To make or receive any payments in the discharge of normal business functions, dispute settlement, or to carry out any other payment requirements.	Processing is necessary for compliance with various employment and revenue laws. The processing is necessary for the performance of contract to which the data subject is party.
Voice of the Customer	To obtain the data subject's feedback by survey on the RIG Healthcare recruitment processes, client services and for research purposes.	Processing is based on request of consent which will be taken from the data subject.
Attracting Talent	To provide support and assistance on recruitment services to data subjects via third party sources, such as LinkedIn and other job sites, from which RIG Healthcare obtain personal data.	Processing is based on legitimate interest.
Supporting Talent	To support data subjects in their career guidance and communicate with them directly with useful information, advice, and support materials through email, messaging, or mobile/web notification.	Processing is based on legitimate interests and contractual obligations.
Regulatory Compliance	To comply with financial regulations and any other relevant laws and regulations.	Processing is necessary for compliance with a legal obligation to which RIG Healthcare is subject. 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.
Third Party Data Sharing	To allow RIG Healthcare to conduct and carry out functions with third party service providers	Processing is necessary for the performance of a contract to which the data subject is party



	that enable RIG Healthcare to deliver services.	or in order to take steps at the request of the data subject prior to entering into a contract.
Back-ups	To store personal data and make back-ups of that data in case of emergencies and for disaster recovery purposes.	Processing is necessary for compliance with a legal obligation to which the RIG Healthcare is subject.
Evidence Submissions	To gather information for dispute resolution services and legal proceedings.	Processing is necessary for compliance with a legal obligation to which the RIG Healthcare is subject.
Transfer of Information for Parties Legal Proceedings	To allow parties to commence legal proceedings.	Processing is necessary for compliance with a legal obligation to which the RIG Healthcare is subject.
CCTV systems	For the security, health, and safety of individuals on RIG Healthcare premises.	Processing is based on legitimate interest and is necessary for compliance with a legal obligation to which the RIG Healthcare is subject.
Accidents and Incidents	To enable RIG Healthcare to comply with employee record keeping obligation pursuant to the Health and Safety at Work Act 1974.	Processing is necessary for compliance with a legal obligation to which the RIG Healthcare is subject.

4 Who Does RIG Healthcare Share Information With?

RIG Healthcare may share personal data with other parties in the course of RIG Healthcare's duties. When this is done, RIG Healthcare adheres to the following principles:

- The transfer is based on a legal obligation, the performance of a contract, or explicit consent.
- Where data is transferred to another party, RIG Healthcare ensures appropriate technical and organisational safeguards are used to protect your personal data.
- Where RIG Healthcare engage a third party to provide a service to RIG Healthcare, RIG Healthcare ensures the provider has taken appropriate technical and organisational measures to process, store, and safeguard your personal data.
- RIG Healthcare, as a Data Controller, will not sell your data to any third party and will take all appropriate steps to ensure the security of your data in dealings with third parties.

While the parties RIG Healthcare engage may change occasionally, RIG Healthcare believe it is important you are aware of the types of parties we share data with. The categories and types of third parties outlined below is a non-exhaustive list but provides an indication of the parties RIG Healthcare shares data with.

4.1 Other Third Parties

Third parties for the purposes of internal and external audits, carrying out research, general practitioners, and or third parties who may improve RIG Healthcare’s processes and services (such as consultants).

4.2 Government Departments, Bodies or Agencies

RIG Healthcare is legally obligated to share personal data with State actors which is outlined in the Data Protection Act 2018.

Recipients of this data include Government departments, agencies and bodies such as HMRC, Procurement Frameworks, the Department for Business, Innovation and Skills (BIS), investigatory bodies and local authorities.

4.3 International Transfers

Where personal data is transferred outside the European Economic Area, RIG Healthcare use safeguards known as Standard Contractual Clauses (SCCs).

5 What Type of Information is Collected?

To fulfil RIG Healthcare’s mandate and perform tasks as outlined in this statement, RIG Healthcare needs to collect various types of personal data.

While the type of personal data may change occasionally, RIG Healthcare believes it is important you are aware of the types of data RIG Healthcare gathers and uses. The following table is a non-exhaustive list and provides an indication of the categories and types of data RIG Healthcare uses to perform RIG Healthcare’s tasks.

Please note that information listed under one category may be used for the performance of a task or in relation to activities under another heading or as outlined under Section 3.

Category	Type of Data
Candidates	<ul style="list-style-type: none"> Contact details, qualifications, employment history, resume, driving license, professional body status, training certificates, interview notes, interview feedback, references, proof of residence documents, Payment company information, sort code, account number.



	<ul style="list-style-type: none">• Special data such as ethnicity, BRP card, VISA, right to work information, fitness to work cert/medical certificates, Data Barring information and overseas police checks.
Employees	<ul style="list-style-type: none">• Contact details, contracts details, pay details, tax information, bank account details, pension details, bonus details, qualifications, employment history including references, interview feedback and interview notes, ID documents, RTW documents (passport, visa etc.), training record, sick leave details, annual leave, performance details such as probation forms, review forms, grievance & disciplinary documents, incident reports.• Special data revealing data concerning health such as medical certificates, doctor notes, fitness to work certificates.
Other Stakeholders	<ul style="list-style-type: none">• Contact details.

6 How Long Does RIG Healthcare Retain Information?

RIG Healthcare has developed a record retention schedule for all the personal data RIG Healthcare holds. Each retention period varies dependent on the nature and the purpose of the processing.

The main factors which determine retention periods are as follows:

1. How long it is required to perform the task;
2. Any legal requirements to hold onto the data;
3. Any pending legal actions.

If you would like to see a copy of the Retention Policy, please contact the DPO at GDPR@righealthcare.co.uk

7 What Are Your Rights?

As a data subject, you will have the following rights as outlined in this section 7. **However, restrictions may apply in certain situations.**



7.1 Where do I send requests?

Please send all your requests to the contact details provided in Section 1, with as much detail as possible about your requirements to allow RIG Healthcare to deal with your request efficiently. To answer your request, RIG Healthcare may ask you to provide identification for verification purposes.

7.2 How long will a request take?

Upon receipt of a request, RIG Healthcare will have 30 days to provide an answer with an extension of two further months if required. If RIG Healthcare requires more time to deal with your request, RIG Healthcare will notify you of the delay and the reasons behind it within 30 days of the receipt of the request. If RIG Healthcare refuses your request, RIG Healthcare will also notify you within 30 days of the receipt of the request accompanied by the reasons for the refusal.

RIG Healthcare will not charge a fee for any requests, provided RIG Healthcare does not consider them to be unjustified or excessive. If RIG Healthcare considers these to be unjustified or excessive, RIG Healthcare may charge a reasonable fee (also applicable for multiple copies) or refuse the request.

You are entitled to contact the Data Protection Commission if RIG Healthcare refuses your request.

7.3 Right of Access

You have a right to know what personal data RIG Healthcare hold on you, why RIG Healthcare holds the data, and how RIG Healthcare is processing your personal data.

When submitting your request, please provide RIG Healthcare with information to help verify your identity and as much detail as possible to help RIG Healthcare understand the information you wish to access (i.e. date range, subject of the request) and email GDPR@righealthcare.co.uk

Please note that an access request is free of charge, however, where RIG Healthcare determines a request to be unjustified or excessive, RIG Healthcare may charge you a reasonable fee.

7.4 Right to Rectification

You have a right to request that our information held on you is up to date and accurate.

Where information is inaccurate or incomplete, RIG Healthcare encourage you to contact RIG Healthcare to have this information rectified. Upon receipt of request, RIG Healthcare will ensure that the personal data is rectified and as up to date as is reasonably possible.

7.5 Right to be Forgotten

You have the right to seek the erasure of your personal data in the following circumstances:

- The personal data is no longer required for the purposes for which it was obtained;



- Where data is being processed on the basis of consent, you withdraw consent to the processing and no other lawful basis exists;
- The personal data is being unlawfully processed;
- You object to the processing of personal data and there are no overriding legitimate grounds for the processing;
- Your personal data requires deletion in line with legal requirements.

However, RIG Healthcare will be unable to fulfil an erasure request if the processing of personal data is necessary for the following:

- Exercising the right of freedom of expression and information;
- Compliance with a legal obligation or for the performance of a task carried out in public interest;
- Reasons of public interest in the area of public health;
- Archiving or statistical purposes in the public interest;
- The establishment, exercise, or defence of legal claims;

Please note that where the legal basis for RIG Healthcare's processing of personal data is on the basis of a legal obligation, some processing in relation to your data may not be subject to the right to erasure.

To determine your request for erasure, RIG Healthcare will carry out an assessment of the justification for the retaining your personal data where a legal requirement applies and contact you if RIG Healthcare is unable to fulfil your request.

Please be aware that in some circumstances RIG Healthcare may need to retain some information to ensure all your preferences are properly respected. For example, RIG Healthcare cannot erase all information about you where you have also asked RIG Healthcare not to send you marketing material. Otherwise, RIG Healthcare would delete your preference not to receive marketing material.

7.6 Right to Restriction

You have the right to restrict the extent of personal data processed by us in circumstances where:

- You believe the personal data is not accurate (restriction period will exist until RIG Healthcare updates your information);
- The processing of the personal data is unlawful, but you wish to restrict the processing of data rather than erase it;



- Where the personal data is no longer required by RIG Healthcare, but you require retention of the information for the establishment, exercise, or defence of a legal claim;
- You have a pending objection to the processing of the personal data;

When processing is restricted, your personal data will only be processed: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of other people; or for reasons important to public interest.

RIG Healthcare will contact you to confirm where the request for restriction is fulfilled and will only lift the restriction after RIG Healthcare has informed you that RIG Healthcare is doing so.

7.7 Right to Data Portability

You have the right to the provision of all personal data held in relation to you in a structured, commonly used and machine-readable format where:

- Processing is completed on the basis of a contract;
- Processing is completed based on consent by you;
- Processing is carried out by automated means.

You may also request that RIG Healthcare sends this personal data to another data controller where technically feasible.

7.8 Right to Object

You have the right to object to the processing of your personal data; however, the processing must have been undertaken on the basis of public interest or legitimate interest by RIG Healthcare.

If you wish to object to the processing of data, please contact us with your request. RIG Healthcare will then stop the processing of personal data unless it is required for legal proceedings.