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Author Name/Title	Emily Gestopa, HR Director		
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Approver Name/Title	Sally Woolston, Director of Quality Assurance		
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## 1. What is the purpose of this document?

Bionical Health Ltd is a "controller" in relation to personal data. This means that we are responsible for deciding how we hold and use personal information about you. You are being given access to this privacy notice because you are applying for work with us (whether as an

employee, worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the UK General Data Protection Regulation (UK GDPR).

## 2. Data protection principles

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

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

## 3. The kind of information we hold about you

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- The information you have provided to us in your curriculum vitae and covering letter.
- The information you have provided to us, including name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications, that you consider to be relevant to your job application.
- Any information you provide to us during an interview.
- The results of any tests that you are asked to complete as part of any recruitment process.

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

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Information about your health, including any medical condition, health and sickness records.

- Information about criminal convictions and offences.

## 4. How is your personal information collected?

We collect personal information about candidates from the following sources:

- You, the candidate.
- Any job board with whom we partner and from which we collect information that you have provided to the job board.
- Any recruitment agency with whom we partner and from which we collect the information in section 3 above.
- Any background check provider with whom we partner and from which we collect information required to complete pre-employment checks, including information about your right to work in the UK, criminal convictions and offences, qualifications, health and immunisation records and other information referred to in section 3 above.
- The Disclosure and Barring Service in respect of criminal convictions.
- Your named referees, from whom we collect information about your previous employment and suitability for the role for which you are applying.
- The Nursing and Midwifery Council.
- The Association of the British Pharmaceutical Industry.

## 5. How we will use information about you?

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the role.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

It is in our legitimate interests to decide whether to appoint you to the role since it would be beneficial to our business to appoint someone to that role.

We also need to process your personal information to decide whether to enter into a contract with you.

Having received your CV and any associated covering letter or your application form and the results of any applicable test, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role, we will then carry out any relevant pre-employment checks before confirming your appointment.

#### If you fail to provide personal information

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 credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

## 6. How we use particularly sensitive personal information

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

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview.
- We will, but only where necessary for legal or regulatory reasons, use information about your immunisation status in order to establish whether you meet the occupational requirements for the role.
- 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.

## 7. Information about criminal convictions

We envisage that we will process information about criminal convictions.

We will collect information about your criminal convictions history if we would like to offer you the role (conditional on checks and any other conditions, such as references, being satisfactory). We are required or in some cases entitled to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. In particular:

- We are legally required by the Care Quality Commission to carry out criminal record checks for those carrying out roles which involve access to patients and/or patient data.
- Any clinical role which is listed on the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (SI 1975/1023) so is eligible for a standard or enhanced check from the Disclosure and Barring Service.
- Any role which requires a high degree of trust and integrity since it involves dealing with patient data and so we would like to ask you to seek a basic disclosure of your criminal records history.

We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

## 8. Automated decision-making

We use automated decision-making only in the context of the automated sifting of applications by job boards such as Indeed, E-Med Careers and Linked-In which apply very basic sifting requirements prior to providing applications for our consideration, for example, that an application mentions that the candidate has a Nurse registration when a Nurse registration is required for a role.

## 9. Data sharing

### Why might you share my personal information with third parties?

We will only share your personal information with certain third party providers such as Reed Screening for the purposes of processing your application. 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.

## 10. Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

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

## 11. Data retention

### How long will you use my information for?

We will retain your personal information for a period of at least 6 months after we have communicated to you our decision about whether to appoint you to a role. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way.

After this period, if you have not been successful in your application for a role, we will retain your personal information on our Candidate Database on the basis that a further opportunity may arise in future and we may wish to consider you for that. We will contact you every 12 months making you aware that you can withdraw your consent to us continuing to hold your personal information at any time. In circumstances that you contact us and withdraw your consent, we will remove your data from our Candidate Database and securely destroy it in accordance with applicable laws and regulations.

## 12. Rights of access, correction, reassurance and restriction

### 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 HR Team at [HR@bionicalhealth.com](mailto:HR@bionicalhealth.com)

Right to withdraw consent

When you apply for a role with us, you provide consent to us processing your personal information for the purposes of the recruitment exercise. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact [HR@bionicalhealth.com](mailto:HR@bionicalhealth.com) Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our Data Retention and Destruction Policy, we will dispose of your personal data securely.

Data protection officer

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), with respect to 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.

**If you have any questions about this privacy notice, please contact the HR Department at [HR@bionicalhealth.com](mailto:HR@bionicalhealth.com)**

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