



## **Excellence Healthcare Services Ltd. Privacy Policy**

Whenever we process our clients' data, we comply with the Data Protection Act 2018 ("DPA") and the UK GDPR. , Personal data includes all the information we hold that identifies the client; for example, customer name, email address, postal address, date of birth, location data, and, in some cases, opinions that we document about the client; as well as special categories of data, including but not limited to, medical and health records, Care Plans, and information about their religious beliefs, ethnic origin and race, sexual orientation, and political views.

Within Excellence Healthcare Services Ltd, whether we collect, store, amend, or transfer customer information, we make sure that the information is adequately protected and used appropriately in compliance with the Data Protection Legislation. This privacy policy provides information about the client's personal data we process, why we process it and how we process it.

### **1. Our responsibilities**

We are a data controller for personal data our clients provide us with. We have appointed the Information Commissioner's Office as the Data Protection Officer, and they will have daily responsibility for ensuring that we comply with the Data Protection Legislation and for dealing with any requests we receive from individuals.

### **2. The personal data we process about our clients.**

We process your data to provide clients with the services they request, to fulfil the contract we enter into with clients and/or to receive services or goods from different stakeholders. We may also process personal data to respond to any queries or comments submitted by clients to us and to correspond with clients on a day-to-day basis. Furthermore, we may need clients' personal data to provide services, meet our legal obligations, enter into contracts with them, and/or provide them with all the information they need. If we do not receive personal data from clients, we may be unable to fulfil our obligations to them.

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More information about the personal data we process is set out below

| Category             | Details                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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| <b>Service users</b> | <p><i><b>This is personal data that we may process about the client (depending on the extent of the information the client has provided to us) includes:</b></i></p> <ul style="list-style-type: none"> <li>• Identity data such as clients first name, middle names, last name, marital status, title, date of birth and gender</li> <li>• Contact data such as clients address, email address and telephone numbers</li> <li>• Financial data including client's bank account and payment card details</li> <li>• Special categories of data including information about client's medical background and health and diversity/equality information such as client's race and ethnicity</li> </ul> <p>We process most of the client's information on the grounds of consent from them, legitimate interests, performance of a contract we have entered with clients, protection of the vital interests of a Data Subject or, in the case of special categories of data, processing for the provision of health or social care or treatment or the management of health or social care systems or services.</p>                                                                                                                                                            |
| <b>Suppliers</b>     | <p><i><b>Personal data that we may process about suppliers includes:</b></i></p> <ul style="list-style-type: none"> <li>• Identity data such as suppliers first name, middle names, last name, marital status, title, date of birth and gender</li> <li>• Contact data such as suppliers address, email address and telephone numbers</li> <li>• Financial data including supplier's bank account and payment card details; and</li> <li>• Transaction data including details about payments made to suppliers (where you are an individual)]</li> </ul> <p>We process most of our supplier's information on the grounds of our legitimate interests (including a business relationship with supplier representative or the company for which they work) and fulfilment of our contract with them (where its an individual). Any information we process about the company for which the supplier representative work rather than them as an individual is not covered by this privacy policy.</p>                                                                                                                                                                                                                                                                          |
| <b>Candidates</b>    | <p><i><b>Personal data that we may process about candidates includes:</b></i></p> <ul style="list-style-type: none"> <li>• Identity data such as the candidates first name, middle names, last name, marital status, title, date of birth and gender</li> <li>• Contact data such as candidates postal address, email address and telephone numbers</li> <li>• Background data such as candidates' education, career background and work experience</li> <li>• Personal information such as candidates' skills and qualities</li> <li>• Any other information that candidates include on any CV, application or covering letter candidates send to us. If this information includes special categories of data we will process that information on the grounds of consent, because candidates have chosen to provide it to us.]</li> </ul> <p>We process most of candidates' information on the grounds of our legitimate interests to determine whether or not we have a suitable vacancy for the candidates. If we obtain consent from candidates' to the processing of their personal data, candidates' can withdraw their consent at any time. This will not affect the lawfulness of any processing we carried out prior to candidates' withdrawing your consent.</p> |

### 3. Who will receive the client's personal data?

**Please note - although the UK is no longer part of the EU, we still comply with the following:**

We only transfer clients' personal data to the extent we need to. Excellence Healthcare Services does not share clients' personal data outside of the EEA.

### 4. How long will we keep your personal data?

We will retain the client's personal data for ten years, and if there are changes to that, the client will be informed. Following the end of the relevant retention period, the client's files and the personal data covered by the retention period will be permanently deleted or destroyed.

### 5. The rights of the client

Clients benefit from several rights regarding the personal data we hold about them. We have summarised the rights which clients are available to them below, depending on the grounds on which we process clients' data. These rights apply for the period in which we process the client's data.

### **5.1 Access to your data**

Clients have the right to ask us to confirm that we process their personal data, as well as have the right to request access to copies of their personal data. Clients can also ask us to provide a range of information, although most of that information corresponds to the information set out in this privacy policy.

We will provide the information free of charge unless the client's request is manifestly unfounded, excessive, or repetitive, in which case we are entitled to charge a reasonable fee. We may also charge clients if they request more than one copy of the same information.

We will provide the information to the client's request as soon as possible and, in any event, within one month of receiving their request. We will let them know if we need more information to comply with the client's request.

### **5.2 Rectification of your data**

If clients believe personal data we hold about them is inaccurate or incomplete, they can ask us to rectify that information. We will comply with their request within one month of receiving it unless we do not feel it is appropriate, in which case we will let the client know why. We will also let them know if we need more time to comply with their request.

### **5.3 Right to be forgotten.**

In some circumstances, clients have the right to ask us to delete personal data we hold about them. This right is available to them:

- Where we no longer need client's personal data for the purpose for which we collected it.
- Where we have collected the client's personal data on the grounds of consent and the client withdraws that consent.
- Where clients object to the processing and we do not have any overriding legitimate interests in continuing processing the data.
- Where we have unlawfully processed the client's personal data (i.e. we have failed to comply with UK GDPR); and
- Where the personal data has to be deleted to comply with a legal obligation.

In certain scenarios, we are entitled to refuse to comply with a request. If any of those apply, we will let you know.

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#### **5.4 Right to restrict processing**

In some circumstances, clients are entitled to ask us to suppress the processing of their personal data. This means we will stop actively processing their personal data, but we do not have to delete it. This right is available to the client:

- If clients believe the personal data we hold is not accurate – we will cease processing it until we can verify its accuracy.
- If clients have objected to us processing the data – we will cease processing it until we have determined whether our legitimate interests override their objection.
- If the processing is unlawful, or if we no longer need the data, the client would like us to keep it because they need it to establish, exercise, or defend a legal claim.

#### **5.5 Data portability**

Clients have the right to ask us to provide their personal data in a structured, commonly used and machine-readable format so that they are able to transmit the personal data to another data controller. This right only applies to personal data they provide to us:

- Where the processing is based on the client's consent or for the performance of a contract (i.e., the right does not apply if we process the client's personal data on the grounds of legitimate interests); and
- Where we carry out the processing by automated means

We will respond to the client's request as soon as possible and, in any event, within one month from the date we receive it. There are instances where we need more time, we let the client know.

#### **5.6 Right to object**

You are entitled to object to us processing the client's personal data:

- If the processing is based on legitimate interests or performance of a task in the public interest or exercise of official authority.
- For direct marketing purposes (including profiling); and
- For scientific or historical research and statistics.

To object, clients must have grounds for doing so based on your particular situation. We will stop processing their data unless we can demonstrate that there are compelling, legitimate grounds which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defense of legal claims.

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### **5.7 Automated decision making**

Automated decision-making means making a decision solely by automated means without any human involvement. This would include, for example, an online credit reference check that makes a decision based on input information without human involvement. It would also have an automated clocking-in system that automatically issues a warning if a person is late a certain number of times (without any input from HR, for example).

We do not make automated decisions using the client's personal data.

### **5.8 The right of the client to complain about our processing**

Suppose the clients think we have processed their personal data unlawfully or have not complied with UK GDPR. In that case, the clients can report their concerns to the supervisory authority in their jurisdiction. The supervisory authority in the UK is the Information Commissioner's Office ("ICO"). Clients can call the ICO on 0303 123 1113 or get in touch via other means, as set out on the ICO website: <https://ico.org.uk/concerns/>.

### **Any questions?**

Please contact us if clients have any questions or want more information about how we process their data.

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