

Health Partners International Limited Candidates-facing Fair Processing Notice

Health Partners International Fair Processing Notice

Last updated: 19th May 2018

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1. **What is this document and why should you read it?**

- 1.1 This privacy notice explains how and why Health Partners International Ltd. (also referred to as “**Health Partners International**”, “**we**”, “**our**” and “**us**”) uses personal data about our candidates (referred to as “**you**”).
- 1.2 You should read this notice, so that you know what we are doing with your personal data. Please also read any other privacy notices that we give you, that might apply to our use of your personal data in specific circumstances in the future.

2. **Health Partners International’s data protection responsibilities**

- 2.1 “**Personal data**” is any information that relates to an identifiable natural person. Your name, address, contact details, salary details and CV are all examples of your personal data, if they identify you.
- 2.2 The term “**process**” means any activity relating to personal data, including, by way of example, collection, storage, use, consultation and transmission.
- 2.3 Health Partners International is a “**controller**” of your personal data. This is a legal term – it means that we make decisions about how and why we process your personal data and, because of this, we are responsible for making sure it is used in accordance with data protection laws.

3. **What types of personal data do we collect and where do we get it from?**

- 3.1 We collect many different types of personal data about you for lots of reasons. We cannot administer your potential employment or other relationship with you without your personal data. Where we don’t need your personal data, we will make this clear, for instance we will explain if any data fields in our application or survey processes are optional and can be left blank.
- 3.2 Further details of the personal data we collect, where we get it from and what we do with it are set out in **Schedule 1**.
- 3.3 You provide us with personal data directly when you apply for a job or project assignment with us, when you complete our candidates processes and information forms or correspond with us and in the course of possible future role. We also create some personal data ourselves and obtain some personal data from other sources. We obtain it from other people and organisations, including some public sources, such as publicly available directories and online resources. You can read more about the sources of personal data in the more detailed information set out in as explained in **Schedule 1**.
- 3.4 If any of the personal information you have given to us changes, such as your contact details, please inform us without delay by contacting your designated point of contact.

4. **What do we do with your personal data, and why?**

- 4.1 We process your personal data for particular purposes in connection with your application for employment or engagement with us, and the management and administration of our business.
- 4.2 We are required by law to always have a permitted reason or justification (called a “lawful basis”) for processing your personal data. There are **six** such permitted lawful basis for processing personal data. The table at **Schedule 2** sets out the different purposes for which we process your personal data and the relevant lawful basis on which we rely for that processing.
- 4.3 Please note that where we have indicated in the table at **Schedule 2** that our processing of your personal data is either:
- 4.3.1 necessary for us to comply with a legal obligation; or

- 4.3.2 necessary for us to take steps, at your request, to potentially enter into an employment or other contract with you, or to perform it

and if you choose not to provide the relevant personal data to us, we may not be able to enter into or continue our contract of employment or engagement with you.

- 4.4 We may also convert your personal data into statistical or aggregated form to better protect your privacy, or so that you are not identified or identifiable from it. Anonymised data cannot be linked back to you. We may use it to conduct research and analysis, including to produce statistical research and reports. For example, to help us understand how many of our total workforce number are on projects and assignments at any given time.

5. **Special category personal data (including criminal data)**

- 5.1 We are required by law to treat certain categories of personal data with even more care than usual. These are called sensitive or special categories of personal data and different lawful bases apply to them. The table at **Schedule 3** sets out the different purposes for which we process your special category personal data and the relevant lawful basis on which we rely for that processing. For some processing activities, we consider that more than one lawful basis may be relevant – depending on the circumstances.

6. **Who do we share your personal data with, and why?**

- 6.1 Sometimes we need to disclose your personal data to other people.

Inside the DAI group

- 6.2 We are part of the DAI Global Health LLC. group of companies. Therefore, we will need to share your personal data with other companies in the DAI group including all affiliates and subsidiaries/ or our US entity, for our general business and workforce management purposes to meet client needs where working across offices/locations, authorisations/approvals with relevant decision makers, parent group reporting and where systems and services are provided on a shared basis. For example, your candidate application, CV and contact details, will be available to colleagues throughout the group.

- 6.3 Access rights between members of the DAI group are limited and granted only on a need to know basis, depending on job functions and roles.

- 6.4 Where any Health Partners International group companies process your personal data on our behalf (as our processor), we will make sure that they have appropriate security standards in place to make sure your personal data is protected and we will enter into a written contract imposing appropriate security standards on them.

Outside the DAI group

- 6.5 From time to time we may¹ ask third parties to carry out certain business, project or other related functions for us, such as the administration of our external recruitment and our IT support. These third parties will process your personal data on our behalf (as our processor). We will disclose your personal data to these parties so that they can perform those functions. Before we disclose your personal data to other people, we will make sure that they have appropriate security standards in place to make sure your personal data is protected and we will enter into a written contract imposing appropriate security standards on them. Examples of these third party service providers include service providers and/or sub-contractors, such as our outsourced recruitment agencies, HR and marketing service providers, and our IT systems software and maintenance, back up, and server hosting providers.

- 6.6 In certain circumstances, we will also disclose your personal data to third parties who will receive it as controllers of your personal data in their own right for the purposes set out above, in particular:
- 6.6.1 if we transfer, purchase, reorganise, merge or sell any part of our business or the business of a third party, and we disclose or transfer your personal data to the prospective seller, buyer or other third party involved in a business transfer, reorganisation or merger arrangement (and their advisors); and
 - 6.6.2 if we need to disclose your personal data in order to comply with a legal obligation, to enforce a contract or to protect the rights, property or safety of our employees, customers or others.
- 6.7 We have set out below a list of the categories of recipients² with whom we are likely to share your personal data:
- 6.7.1 consultants and professional advisors including legal advisors and accountants;
 - 6.7.2 courts, court-appointed persons/entities, receivers and liquidators;
 - 6.7.3 clients, project partners and joint ventures;
 - 6.7.4 charities, trade associations and professional bodies;
 - 6.7.5 insurers; and
 - 6.7.6 governmental departments, European Institutions, the World Bank, other statutory and regulatory bodies of Her Majesty's Government, including the UK Department for International Development, the UK Department for Work & Pensions, the UK Information Commissioner's Office, the police and UK Her Majesty's Revenue and Customs.

We may also share your personal data with third parties, as directed by you.

7. **Where in the world is your personal data transferred to?**

- 7.1 If any of our processing activities require your personal data to be transferred outside the European Economic Area, we will only make that transfer if:
- 7.1.1 the country to which the personal data is to be transferred ensures an adequate level of protection for personal data;
 - 7.1.2 we have put in place appropriate safeguards to protect your personal data, such as an appropriate contract with the recipient;
 - 7.1.3 the transfer is necessary for one of the reasons specified in data protection legislation, such as the performance of a contract between us and you; or
 - 7.1.4 you explicitly consent to the transfer.

8. **How do we keep your personal data secure?**

We will take specific steps (as required by applicable data protection laws) to protect your personal data from unlawful or unauthorised processing and accidental loss, destruction or damage. For more information, please read our

9. **How long do we keep your personal data for?**

9.1 We will keep your personal data during the period of your application for employment and we have a clear policy to keep CV's for future reference. Note that application forms give applicants the opportunity to object to their details being retained. This may mean that we keep some types of personal data for longer than others.

9.2 We will only retain your personal data for as long as you allow us. You have the option to request that your details are erased at any time. This will depend on a number of factors, including:

9.2.1 any laws or regulations that we are required to follow;

9.2.2 whether we are in a legal or other type of dispute with each other or any third party;

9.2.3 the type of information that we hold about you; and

9.2.4 whether we are asked by you or a regulatory authority to keep your personal data for a valid reason.

10. **What are your rights in relation to your personal data and how can you exercise them?**

10.1 You have certain legal rights, which are briefly summarised at **Schedule 4**, in relation to any personal data about you which we hold.

10.2 ³Where our processing of your personal data is based on your **consent**, you have the right to withdraw your consent at any time. If you do decide to withdraw your consent we will stop processing your personal data for that purpose, unless there is another lawful basis we can rely on – in which case, we will let you know. Your withdrawal of your consent won't impact any of our processing up to that point.

10.3 Where our processing of your personal data is necessary for our **legitimate interests**, you can object to this processing at any time. If you do this, we will need to show either a compelling reason why our processing should continue, which overrides your interests, rights and freedoms or that the processing is necessary for us to establish, exercise or defend a legal claim.

10.4 If you wish to exercise any of your rights please contact gdpr@dai.com in the first instance.

10.5 You also have the right to lodge a complaint with the Information Commissioner's Office, which is the UK data protection regulator. More information can be found on the Information Commissioner's Office website at <https://ico.org.uk/>.

11. **Updates to this notice**

We may update this notice from time to time to reflect changes to the type of personal data that we process and/or the way in which it is processed. We will update you on material changes to this statement through appropriate notices either on Health Partners International website or contacting you using other communication channels. We also encourage you to check this notice on a regular basis.

12. **Where can you find out more?**

If you want more information about any of the subjects covered in this privacy notice or if you would like to discuss any issues or concerns with us, you can contact us in any of the following ways:



By email at: gdpr@dai.com

By post at: Health Partners International Ltd, F1 Waterside Centre, North Street, Lewes, East Sussex, BN7 2PE, United Kingdom

SCHEDULE 1

Categories of personal data

Type of personal data ⁴	Collected from ⁵
a) Contact Information <ul style="list-style-type: none"> • Name(s) • Address(es) • Email address(es) • Contact details including mobile telephone number(s) 	You
b) Personal Information <ul style="list-style-type: none"> • Date of birth • Gender • Next of kin or other dependants • Marital or relationship status • Emergency contact information 	You
c) Identity and Background Information <ul style="list-style-type: none"> • Details of education and qualifications and results • Career history, experience and skills • Passport information • Driving licence information • Psychometric test results (if applicable) • Right to work, residency and/or other visa information (where unrelated to your race or ethnicity) • Curriculum Vitae (CV) or resume and professional profile • Image or photographs • Application form • Evaluative notes and decisions from job interviews • Preferences relating to projects, job location and salary • Conflicts of interests (including where related to family networks) 	<ul style="list-style-type: none"> • You • Recruitment consultants and agencies • Your previous employers • Publicly available information from online resources
d) Financial Information <ul style="list-style-type: none"> • Bank account details • Salary, compensation and other remuneration information • National insurance number and/or other governmental identification numbers • Business expense and reimbursement details 	<ul style="list-style-type: none"> • You • Your previous employer
e) Special Category Personal Data <ul style="list-style-type: none"> • Racial or ethnic origin (including your nationality and visa information) • Religious or philosophical beliefs 	<ul style="list-style-type: none"> • You

Type of personal data ⁴	Collected from ⁵
<ul style="list-style-type: none"> • Biometric data (including fingerprint and retinal scans) • Data concerning physical and/or mental health (including occupational health requirements, accident reports, day-to-day health concerns, dietary requirements, allergies, drug and alcohol test results and reasons for any short term or long term absence) • Sexual orientation • Information relating to actual or suspected criminal convictions and offences 	<ul style="list-style-type: none"> • Your use of Health Partners International security control systems
f) Travel and Expenses Information	
<ul style="list-style-type: none"> • Transaction records • Visa, passport and insurance details • Flight and accommodation booking information • Travel itinerary information 	<ul style="list-style-type: none"> • You
g) Asset, Systems and Platform Usage and Communications Information	
<ul style="list-style-type: none"> • IP addresses and other online and physical device identifiers • Records of calls, messages and/or internet or other data traffic and communications 	<ul style="list-style-type: none"> • Your use of Health Partners International assets, systems and platforms
h) Security, Location and Access Information	
<ul style="list-style-type: none"> • Information (including any image and biometric data) captured or recorded by electronic card access systems, CCTV and other security control systems 	<ul style="list-style-type: none"> • You • Your use of Health Partners International security control systems

SCHEDULE 2

Purposes of processing personal data

For some processing activities, we consider that more than one lawful basis may be relevant – depending on the circumstances.

Purposes of processing	Categories of personal data	Lawful basis We are permitted to process your personal data because...					
		1. You have given your consent to the processing (Please also see paragraph 10.2)	2. It is necessary to perform your employment contract	3. It is necessary for us to comply with a legal obligation	4. It is necessary for our legitimate interests or those of third parties ⁶	5. It is necessary to protect your vital interests (or those of someone else)	6. It is necessary to perform a task in the public interest or in our official authority
a) Recruitment and workforce planning⁷							
1. Administering your application for a job or assignment with us and considering your suitability for the relevant role					✓		
2. Obtaining, considering and verifying your references and employment/work history					✓		
3. Reviewing and confirming your right to work in the UK				✓			
4. Conducting verification and vetting, including criminal background checks and credit checks where required by law (Note: special category personal data paragraph 3)				✓			
5. Conducting background checks, verification and vetting which are not required by law but needed by us to assess your suitability for your role (Note: special category personal data paragraph 3)		✓				✓	
6. Making a job offer to you and entering into a contract of employment with you			✓				

Purposes of processing	Categories of personal data	Lawful basis					
		We are permitted to process your personal data because...					
		1. You have given your consent to the processing (Please also see paragraph 10.2)	2. It is necessary to perform your employment contract	3. It is necessary for us to comply with a legal obligation	4. It is necessary for our legitimate interests or those of third parties ⁶	5. It is necessary to protect your vital interests (or those of someone else)	6. It is necessary to perform a task in the public interest or in our official authority
7. Identifying and assessing Health Partners International's strategic business direction and resourcing needs, current staff and areas for development					✓		
8.					✓		
9. Analysing recruitment and retention objectives, processes and employee turnover rates					✓		
10. Developing, operating and collecting feedback on recruitment activities and staff selection processes					✓		
b)							
11. Contacting the appropriate person in the event of an emergency concerning you (Note: special category personal data paragraph 3)						✓	
12. Administering our insurance policies (Note: special category personal data paragraph 3)					✓		
13. Determining whether any adjustments are necessary to enable you to carry out your role (Note: special category personal data paragraph 3)			✓	✓			
c) Security and governance							
14. Monitoring the security of Health Partners International's physical premises and systems, networks and applications				✓	✓		
15. Identifying, investigating and mitigating suspected misuse of Health Partners International's assets, systems and platforms (Note: special category personal data paragraph 3)				✓	✓		✓?
d) Legal and regulatory compliance and responsibilities							
16. Managing and administering our equal opportunities reporting (Note: special category personal data paragraph 3)				✓			

Purposes of processing	Categories of personal data	Lawful basis					
		We are permitted to process your personal data because...					
		1. You have given your consent to the processing (Please also see paragraph 10.2)	2. It is necessary to perform your employment contract	3. It is necessary for us to comply with a legal obligation	4. It is necessary for our legitimate interests or those of third parties ⁶	5. It is necessary to protect your vital interests (or those of someone else)	6. It is necessary to perform a task in the public interest or in our official authority
17. Responding to binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities (Note : special category personal data paragraph 3)				✓			✓
18. Responding to non-binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities					✓		
19. Complying with disclosure orders arising in civil proceedings (Note : special category personal data paragraph 3)				✓			✓
20. Investigating, evaluating, demonstrating, monitoring, improving, reporting on and meeting Health Partners International's compliance with relevant legal and regulatory requirements (Note : special category personal data paragraph 3)				✓			✓
21. Investigating, evaluating, demonstrating, monitoring, improving, reporting on and meeting Health Partners International's compliance with best practice and good governance responsibilities					✓		

SCHEDULE 3

Purposes of processing special category personal data

Purposes of processing	Special category lawful basis					
	We are permitted to process your personal data because...					
	1. You have given your explicit consent to the processing	2. It is necessary for your/our obligations and rights in the field of employment and social security and social protection law	3. It is necessary to protect the vital interests of the data subject or another person you or they are physically or legally incapable of giving consent	4. It is necessary for our establishment, exercise or defence of legal claims	5. It is necessary for reasons of substantial public interest	6. It is necessary for preventive or occupational medicine, for the assessment of the working capacity of the employee
a) Recruitment and workforce planning⁸						
1. Conducting verification and vetting, including criminal background checks and credit checks where required by law		✓			✓	
2. Conducting background checks, verification and vetting which are not required by law but needed by us to assess your suitability for your role	✓				✓	
b) Security and governance						
3. Identifying, investigating and mitigating suspected misuse of Health Partners International's assets, systems and platforms				✓		
c) Legal and regulatory compliance and responsibilities						
4. Responding to binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities or sharing information (on a voluntary basis) with the same				✓		
5. Complying with disclosure orders arising in civil proceedings				✓		
6. Investigating, evaluating, demonstrating, monitoring, improving and reporting on Health Partners				✓		

		Special category lawful basis					
		We are permitted to process your personal data because...					
Purposes of processing		1. You have given your explicit consent to the processing	2. It is necessary for your/our obligations and rights in the field of employment and social security and social protection law	3. It is necessary to protect the vital interests of the data subject or another person you or they are physically or legally incapable of giving consent	4. It is necessary for our establishment, exercise or defence of legal claims	5. It is necessary for reasons of substantial public interest	6. It is necessary for preventive or occupational medicine , for the assessment of the working capacity of the employee
International's compliance with relevant legal and regulatory requirements							
7. Responding to employment relations matters where permitted by applicable law, including criminal investigations, grievances, negotiations					✓		
8. Making reasonable adjustments as needed to help remove barriers faced by you in your application because of any disability you might have			✓				

SCHEDULE 4

Your rights in relation to personal data

Your right	What does it mean?	Limitations and conditions of your right
Right of access	Subject to certain conditions, you are entitled to have access to your personal data (this is more commonly known as submitting a "data subject access request").	If possible, you should specify the type of information you would like to see to ensure that our disclosure is meeting your expectations. We must be able to verify your identity. Your request may not impact the rights and freedoms of other people, eg privacy and confidentiality rights of other staff.
Right to data portability	Subject to certain conditions, you are entitled to receive the personal data which you have provided to us and which is processed by us by automated means, in a structured, commonly-used machine readable format.	If you exercise this right, you should specify the type of information you would like to receive (and where we should send it) where possible to ensure that our disclosure is meeting your expectations. This right only applies if the processing is based on your consent or on our contract with you and when the processing is carried out by automated means (ie not for paper records). It covers only the personal data that has been provided to us by you.
Rights in relation to inaccurate personal or incomplete data	You may challenge the accuracy or completeness of your personal data and have it corrected or completed, as applicable. You have a responsibility to help us to keep your personal information accurate and up to date. We encourage you to notify us of any changes regarding your personal data as soon as they occur, including changes to your contact details, telephone number, immigration status.	Please always check first whether there are any available self-help tools to correct the personal data we process about you. This right only applies to your own personal data. When exercising this right, please be as specific as possible.
Right to object to or restrict our data processing	Subject to certain conditions, you have the right to object to or ask us to restrict the processing of your personal data.	As stated above, this right applies where our processing of your personal data is necessary for our legitimate interests. You can also object to our processing of your personal data for direct marketing purposes.
Right to erasure	Subject to certain conditions, you are entitled to have your personal data erased (also known as the " <i>right to be forgotten</i> "), eg where your personal data is no longer needed for the purposes it was collected for, or where the relevant processing is unlawful.	We may not be in a position to erase your personal data, if for example, we need it to (i) comply with a legal obligation, or (ii) exercise or defend legal claims.
Right to withdrawal of consent	As stated above, where our processing of your personal data is based on your consent you have the right to withdraw your consent at any time.	If you withdraw your consent, this will only take effect for future processing.