

GENERAL DATA PROTECTION REGULATION POLICY

INTRODUCTION

Purpose

Excellent Care Ltd. is transparent in collecting and using personal data of its workforce and in meeting its obligation under data protection.

This policy relates to personal information pertaining to job seekers, applicants, employees (both direct and indirect through panel providers), volunteers, interns and previous employees referred to as HR information. This policy also applies to the personal data of clients or other personal data processed for business purposes.

Excellent Care Ltd. has appointed the director as the responsible person for data protection compliance. He can be contacted at accounts@ecareuk.com. Questions about this policy or information requests shall be directed to him.

Definitions

‘Personal data’ is any information relating to an individual/applicant revealing the person’s identity. Processing means using this information for collection, storage, amendments and disclosure.

‘Special categories of personal data’ means information pertaining to a person’s race, ethnicity, political, religious and philosophical opinions or beliefs, trade union memberships, health, sexual orientation, sex life and biometric information.

‘Criminal records data’ means any information relating to an individual's criminal convictions and offences, and information relating to any criminal allegations and proceedings.

Principles of Data Protection

Excellent Care Ltd. processes human resources related personal information in accordance with the data protection principles in accordance with Article 5 of GDPR:

- ✓ We process personal information in a lawful, fair and transparent manner.
- ✓ We collect personal information only for specific, unambiguous and legitimate purposes.
- ✓ We process personal information only where it is necessary, relevant and restricted to what is relevant for the purposes of processing, which is usually 2 years, unless special consent has been obtained to extend.
- ✓ We maintain accurate personal information and take necessary steps to make sure

that any irrelevant or inaccurate personal information is deleted or amended promptly.

- ✓ We maintain personal information only for those periods which are necessary for processing.
- ✓ We undertake relevant measures to ensure that personal information is safe, secure and protected against unlawful or unauthorised processing, unplanned and/or unintentional loss.
- ✓ We inform individuals about the reasons for processing personal data, how to use the data and the legal base for processing in private. Excellent Care Ltd. will not process individual personal information for any other purposes.
- ✓ When Excellent Care Ltd. handles special information pertaining to applicant's criminal records data or undertake obligations or to exercise rights according to employment law. This is done in accordance with the policy on special information on criminal records data.
- ✓ Excellent Care Ltd. updates all personal information correctly if an individual informs about any amendments or notify us that any of their information we hold is inaccurate.
- ✓ Personal information is gathered through recruitment (including employment, worker, volunteer, contractor relationships and may be held as hard or soft copy or both. The periods for which Excellent Care Ltd. holds personal information are included in their privacy policy.
- ✓ Excellent Care Ltd. maintains records of its processing of HR related personal information with respect to the requirements under the GDPR (General Data Protection Regulation).

Nature of work – Domiciliary & Nursing Care

Description of processing

The following is a broad description of the way this organisation/data controller processes personal information. To understand how your own personal information is processed you may need to refer to any personal communications you have received, check any privacy notices the organisation has provided or contact the organisation to ask about your personal circumstances.

Reasons/purposes for processing information:

- We process personal information to enable us to provide care in the home to our clients;
- To promote our services;
- Maintain our own accounts and records and support and manage our staff.

Type/classes of information processed

We process information relevant to the above reasons/purposes. This may include:

- Personal details
- Family details
- Lifestyle and social circumstances
- Financial details
- Employment and education details
- Goods or services provided

We also process sensitive classes of information that may include:

- Physical or mental health details
- Sexual life
- Racial or ethnic origin
- Religious or other beliefs
- Trade union membership



Who the information is processed about

We process personal information about:

- Clients
- Customers
- Employees
- Suppliers and service providers
- Professional experts and consultants
- Complaints, enquirers

Who the information may be shared with

We sometimes need to share the personal information we process with the individual themselves and also with other organizations. Where this is necessary we are required to comply with all aspects of the Data Protection Act (DPA). What follows is a description

of the types of organizations we may need to share some of the personal information we process with for one or more reasons.

Where necessary or required we share information with:

- family, associates and representatives of the person whose personal data we are processing
- current, past or prospective employers
- employment and recruitment agencies
- financial organizations
- educators and examining bodies
- credit reference agencies
- debt collection and tracing agencies
- business associates and other professional advisers
- healthcare and welfare organizations
- suppliers, providers of goods or services
- persons making an enquiry or complaint;
- central government

Transfers

It may sometimes be necessary to transfer personal information overseas. When this is needed information is only shared within the European Economic Area (EEA). Any transfers made will be in full compliance with all aspects of the data protection act.

Your Rights Under GDPR

Your new rights under the GDPR are set out in this policy notice. These rights will apply once the GDPR becomes law on 25th May 2018. Please read the following carefully so that you understand our practices regarding your personal data and how we will manage it.

We collect the personal data of the following types of people to allow us to undertake our business:

1. Prospective and placed candidates for permanent and temporary roles
2. Prospective and live client contacts

3. Supplier contacts to support our services
4. Employees, consultants and temporary workers

We collect information about you to carry out our core business and ancillary activities.

Information We Collect About You

1. This is personal information about you that you supply to us by filling in forms on our website or by corresponding with us by phone, e-mail or other communication channels. It includes information you provide when you register to use our site, to enter our database, subscribe to our services, attend our events, participate in discussion boards or other social media functions on our site, enter a competition, promotion or survey, and when you report a problem with our site.
2. The information you give us, or we collect about you, including: your name, address, private and corporate e-mail address, phone number, financial information, compliance documentation and references verifying your employment history, experience and qualifications, your right to work in the UK, curriculum vitae (CV) and photograph and links to your professional profiles available in the public domain (LinkedIn, Twitter, Facebook or corporate websites).

Information We Collect When You Visit Our Website

With respect to each of your visits to our site, we will automatically collect the following information:

1. Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet.
2. Your login information (if applicable), browser plug-in type and version.
3. Your operating system and platform, information about your visit, including the full Uniform Resource Locators (URL).
4. Click stream to, through and from our site (including date and time).
5. Products you viewed or searched for, page response times and download errors.
6. Length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-over); and methods used to browse away from the page.
7. Any phone number used to call our customer service number.

Information We Obtain from Other Sources

1. This is information we obtain about you from other sources such as LinkedIn, corporate websites, job board websites, online CV libraries, your business card and personal recommendations.
2. In this case we will inform you, by sending you this policy notice, within a maximum of 30 days of collecting the data of the fact we hold personal data about you, the source the personal data originates from, whether it came from publicly accessible sources, and for what purpose we intend to retain and process your personal data.
3. We work closely with third parties, including companies within our Group, business partners, sub-contractors in technical, professional, payment and other services, advertising networks, analytics providers, search information providers, credit reference agencies, professional advisors. We may receive information about you from them for the purposes of our recruitment services and ancillary support services.

Purposes of the Processing and the Legal Basis for the Processing

We use information held about you in the following ways:

1. To carry out our obligations arising from any contracts we intend to enter into (or have entered into between you and us); and to provide you with the information, products and services that you request from us or we think will be of interest to you because it is relevant to your career or to your organization.
2. To provide you with information about other goods and services we offer that are similar to those that you have already purchased, been provided with or enquired about.
3. The core service we offer to our candidates and clients is the introduction of candidates to our clients for the purpose of temporary or permanent engagement. Our services also involve supporting individuals throughout their career and supporting businesses' recruitment needs and strategies.
4. Our legal basis for the processing of personal data is our legitimate business interests, described in more detail below, although we will also rely on contract, legal obligation and consent for specific uses of data.
5. We will rely on contract if we are negotiating or have entered into a placement agreement with you or your organization or any other contract to provide services to you or receive services from you or your organization.
6. We will rely on legal obligation if we are legally required to hold information on to you to fulfill our legal obligations.
7. We will in some circumstances rely on consent for particular uses of your data and

you will be asked for your express consent, if legally required. An example of when consent may be the lawful basis for processing include gaining permission to introduce you to a client if you are a candidate.

Our Legitimate Business Interests

Our legitimate interests in collecting and retaining your personal data are described below:

1. As a recruitment business and recruitment agency we introduce candidates to clients for permanent employment, temporary worker placements or independent professional contracts. The exchange of personal data of our candidates and our client contacts is a fundamental, essential part of this process.
2. In order to support our candidates' career aspirations and our clients' recruitment needs, we require a database of candidate and client personal data containing historical information as well as data pertaining to current resourcing requirements.
3. To expand, develop and maintain our business we need to record the personal data of prospective candidates and client contacts.

Consent

Should we want or need to rely on consent to lawfully process your data, we will request your consent orally, by email or by an online process for the specific activity we require consent for and record your response on our CRM system. Where consent is the lawful basis for our processing, you have the right to withdraw your consent to this particular processing at any time.

Other Uses We Will Make of Your Data

1. Use of our website ("our site").
2. To notify you about changes to our service.
3. To ensure that content from our site is presented in the most effective manner for you and for your computer.

We will use this information to:

1. Administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
2. Improve our site to ensure that content is presented in the most effective manner for you and for your computer.
3. Allow you to participate in interactive features of our service, when you choose to do so.
4. As part of our efforts to keep our site safe and secure.
5. Measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you.
6. Make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.
7. We do not undertake automated decision making or profiling. We do use our computer systems to search and identify personal data in accordance with parameters set by a person. A person will always be involved in the decision-making process.

DECLARATION BY THE EMPLOYEE

I, _____, understand the information provided above, and I agree with all the terms of Excellent Care Ltd.'s GDPR policy.

Employee Name : _____

Employee Signature : _____

Date : _____

PLEASE NOTE: All correspondence relating to any queries and objections must be addressed to Mr. Sinon George and raised via email through accounts@ecareuk.com. Alternatively, you may send us a letter to our head office at Excellent Care Ltd., 53 Westway, Caterham, CR3 5TQ.