

Cobalt GDPR & Privacy Agreement

Introduction

Cobalt Health is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you, both during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR) and data protection legislation.

It applies to all applicants and former employees, workers and contractors.

Privacy Policy

Cobalt Health is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice does not form part of any contract of employment or other contracts to provide services. We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice(s) we may provide in the future, so that you are fully aware of the detail and rationale in relation to us using such information when collecting or processing personal information about you.

Categories of personal data we process

We will collect, store, and use the following categories of personal information about you:

- personal contact details, for example - name, title, addresses, telephone numbers, personal email addresses, date of birth, gender, marital status, dependants, etc.
- next of kin and emergency contact information
- National Insurance number
- bank account details, payroll records and tax status information
- salary details, annual leave, pension and benefits information
- start date
- copy of driving licence
- recruitment information (including copies of right to work documentation, certified copy of qualifications appropriate to your role, references and other information included in a CV or cover letter or as part of the application process)

- employment records (including terms and conditions of employment, work history, working hours, training records and professional membership details)
- compensation history
- performance information (including appraisals and performance improvement plans)
- details of any disciplinary and grievance proceedings you have been involved in
- details of any leave you have taken (including holidays; sickness; family and parental leave)
- details in relation to your use of our information and communications systems
- photographs
- trade union membership details
- information about your health, (including any medical condition(s), health and sickness records and details of any disabilities for which we may need to make reasonable adjustments)
- information about criminal convictions and offences

Sources of personal data

We collect personal information about you through the application and recruitment process, either obtained directly from you, from an employment agency or from a background check provider. We may, on occasion, collect additional information from third parties including former employers and credit reference agencies.

We also collect additional personal information during the course of work-related activities throughout the period you are working for us.

Our lawful basis for processing your data

We will use your personal information in the following circumstances:

- where we need to perform the contract we have entered into with you
- where we need to comply with a legal obligation
- where it is necessary for our legitimate interests or those of a third party and your interests and fundamental rights do not override those interests

Our purposes for processing your data:

- making a decision about your recruitment or appointment
- determining the terms on which you work for us
- checking you are legally entitled to work in the UK
- paying you and, if you are an employee, deducting tax and National Insurance contributions
- liaising with your pension provider

- administering the contract we have entered into with you
- business management and planning, including accounting and auditing
- conducting performance reviews, managing performance and determining performance requirements
- making decisions about salary reviews and compensation
- assessing qualifications for a particular job or task, including decisions about promotions
- gathering evidence for possible grievance or disciplinary meetings
- making decisions about your continued employment or engagement
- making arrangements for the termination of employment or any contract you have with us
- education, training and development requirements
- dealing with possible legal disputes involving you, or other employees, workers and contractors, including accidents at work
- checking your fitness to work
- managing sickness absence
- complying with health and safety obligations
- to prevent fraud
- to monitor your use of our information and communication systems to ensure compliance with our IT policies
- to ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution
- to conduct data analytics studies to review and better understand employee retention and attrition rates
- equal opportunities monitoring
- some of the above grounds for processing will overlap and there may be several grounds that justify our use of your personal information

Who has access to your data?

We may share your personal information with third parties if required by law or where we have a legitimate interest in doing so.

Recipients of your data may include former employers whom we obtain references from, organisations who carry out employment background checks, and any regulatory bodies where enhanced checks are required.

When sharing your information with third parties, we will ask that they respect the security of your data and treat it in accordance with the law.

Security of your data

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 will ensure that access to your personal information is limited to those employees, agents, contractors and other third parties who have a business need to access this.

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.

How we decide how long to retain your data?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data. We also consider the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means.

What if you do not provide personal data?

If you do not provide personal data, it is likely to be impossible for Cobalt Health to enter into, or to continue with, an employment relationship with you.

Automated decision-making

Cobalt Health may make use of electronic automated decision-making systems. We would only do so in the following circumstances:

- where we have notified you of the decision and given you 21 days to request reconsideration
- where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights
- in limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights

Employment decisions are not based solely on automated decision-making.

Changes to this privacy notice

Cobalt Health reserves 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 by alternative means, periodically, about the processing of your personal information.

Automatically Generated Check List

Parts of your data may be passed on to the following third parties to conduct relevant compliance checks:

Company	More Information
Personal References	Name, Claim
Employment References	Name, Claim, DOB, NI Number
Academic References	Name, Claim, DOB, NI Number

Right to Object

You have the right to object to the 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.

This can be done by contacting the Data Protection Officer at dataprotection@cobalthhealth.co.uk

Data Subject Rights Processes

You have the right to:

- request access to, and obtain a copy of, your personal information
- request edits of the personal information that we hold about you if any of the information is incorrect
- request deletion of your personal information
- object to the 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.

If you believe we have not complied with your rights, you can complain to the Information Commissioner.