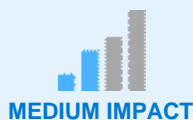




## Review Sheet

Last Reviewed  
24 Jun '24Last Amended  
24 Jun '24Next Planned Review in 12 months, or  
sooner as required.

Business impact



Changes are important, but urgent implementation is not required, incorporate into your existing workflow.

Reason for this review

Scheduled review

Were changes made?

Yes

Summary:

This External and Employee Privacy Policy and Procedure was previously known as the 'Data Privacy Policy and Procedure'. It continues to provide guidance and support on the measures and requirements in place around external and employee privacy at Natali Healthcare Solutions UK Ltd and its associated companies. This policy has been reviewed with minor changes including simplifying the language used. Underpinning Knowledge and Further Reading reference links have also been checked and updated.

Relevant legislation:

- Data Protection Act 2018
- UK GDPR

Underpinning knowledge - What have we used to ensure that the policy is current:

- Author: ICO, (2021), *Right to be informed*. [Online] Available from: <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/individual-rights/right-to-be-informed/> [Accessed: 9/12/2024]
- Author: ICO, (2021), *UK GDPR guidance and resources*. [Online] Available from: <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/> [Accessed: 9/12/2024]

Suggested action:

- Encourage sharing the policy through the use of the QCS App
- Share 'Key Facts' with all staff

Equality Impact Assessment:

QCS have undertaken an equality analysis during the review of this policy. This statement is a written record that demonstrates that we have shown due regard to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations with respect to the characteristics protected by equality law.



## 1. Purpose

**1.1** To provide Natali Healthcare Solutions UK Ltd and its associated companies with two template privacy policies - one for use with employees and one for use with external data subjects, including Service Users. There may be some overlap between the External Privacy Policy and the Website Privacy Policy template. Natali Healthcare Solutions UK Ltd and its associated companies understands that the Website Privacy Policy deals only with collection of personal data via the website of Natali Healthcare Solutions UK Ltd and its associated companies. Natali Healthcare Solutions UK Ltd and its associated companies may combine the Website Privacy Policy and this External Privacy Policy if it wishes to do so.

**1.2** By using the template privacy policies provided within the 'Forms' sections of the UK GDPR suite, Natali Healthcare Solutions UK Ltd and its associated companies will meet one of the key requirements of UK GDPR in terms of the provision of information to a data subject.

**1.3** To support Natali Healthcare Solutions UK Ltd and its associated companies in meeting the following Key Lines of Enquiry/Quality Statements (New):

| Key Question | Key Lines of Enquiry   | Quality Statements (New)                        |
|--------------|--|---|
| WELL-LED     | W2: Does the governance framework ensure that responsibilities are clear and that quality performance, risks and regulatory requirements are understood and managed? | QSW5: Governance, management and sustainability |

**1.4** To meet the legal requirements of the regulated activities that Natali Healthcare Solutions UK Ltd and its associated companies is registered to provide:

- Data Protection Act 2018
- UK GDPR



## 2. Scope

**2.1** The following roles may be affected by this policy:

- All staff

**2.2** The following Service Users may be affected by this policy:

- Service Users

**2.3** The following stakeholders may be affected by this policy:

- Family
- Advocates
- Representatives
- Commissioners
- External health professionals
- Local Authority
- NHS



## 3. Objectives

**3.1** To enable Natali Healthcare Solutions UK Ltd and its associated companies to circulate or make available its privacy policies to data subjects to ensure compliance with one of the key elements of UK GDPR.

**3.2** To ensure that all data subjects understand the ways in which their personal data is processed by Natali Healthcare Solutions UK Ltd and its associated companies.



## 4. Policy

**4.1** Natali Healthcare Solutions UK Ltd and its associated companies understands that UK GDPR requires organisations to provide certain information to all data subjects about how Natali Healthcare Solutions UK Ltd and its associated companies processes personal data.

**4.2** Natali Healthcare Solutions UK Ltd and its associated companies has determined that the simplest and most effective way to provide the required information is through privacy policies which may be issued in hard copy, soft copy or made available on the website or (for employee privacy policies) and internal intranet or similar of Natali Healthcare Solutions UK Ltd and its associated companies. Natali Healthcare Solutions UK Ltd and its associated companies acknowledges that making privacy policies available from a central source, such as the website or intranet, is preferable as they can be updated and new versions accessed by data subjects from such location.

**4.3** Natali Healthcare Solutions UK Ltd and its associated companies understands that the processing of personal data it carries out in respect of its staff and employees will differ from the processing of personal data it carries out in respect of external clients, contacts and Service Users. Natali Healthcare Solutions UK Ltd and its associated companies will, therefore, produce and circulate at least two privacy policies, one to employees and another to external contacts and Service Users.



## 5. Procedure

**5.1** Natali Healthcare Solutions UK Ltd and its associated companies will review the following Template Privacy Policies located in the 'Forms' sections of the UK GDPR suite within QCS Compliance Centre and adapt them before circulating them to the relevant data subjects:

- Template Privacy Policy - Employees
- Template Privacy Policy - External

Natali Healthcare Solutions UK Ltd and its associated companies will ensure that all aspects of the privacy policies are relevant and reflect the ways in which Natali Healthcare Solutions UK Ltd and its associated companies processes personal data. If Natali Healthcare Solutions UK Ltd and its associated companies has any concerns or queries in relation to the privacy policies, it will seek legal advice.

**5.2** Natali Healthcare Solutions UK Ltd and its associated companies will consider whether it would benefit from producing more than two types of privacy policies. For example, Natali Healthcare Solutions UK Ltd and its associated companies may deem it necessary to modify the privacy policies provided to Service Users so that they can be used with other external contacts and suppliers.

**5.3** Natali Healthcare Solutions UK Ltd and its associated companies may decide that the types of personal data it processes differ in relation to various types of data subjects, so an additional privacy policy may be required.

Natali Healthcare Solutions UK Ltd and its associated companies acknowledges that it may be able to use the privacy policy templates provided within the 'Forms' sections of the UK GDPR suite in QCS Compliance Centre for a further privacy policy, but will seek legal advice if necessary.

**5.4** Natali Healthcare Solutions UK Ltd and its associated companies understands that the privacy policies cover the processing of personal data that has been obtained other than through its website.

Collection of personal data via the website will be governed by the Website Privacy and Cookies Policy and Procedure at Natali Healthcare Solutions UK Ltd and its associated companies and the National Data Opt-Out Policy and Procedure.



## 6. Definitions

### 6.1 Data Subject

- The identified or identifiable individual about whom Natali Healthcare Solutions Uk Ltd and its associated companies has collected personal data

### 6.2 Data Protection Act 2018

- The Data Protection Act 2018 is a United Kingdom Act of Parliament that updates data protection laws in the UK. It sits alongside the General Data Protection Regulation and implements the EU's Law Enforcement Directive

### 6.3 UK GDPR

- The UK GDPR is the retained EU law version of GDPR that forms part of English law

### 6.4 Personal Data

- Any information about a living person from which that person can be identified directly or indirectly, including but not limited to names, email addresses, postal addresses, job roles, photographs, CCTV, online identifiers and special categories of data, as defined below

### 6.5 Process or Processing

- Doing anything with personal data, including but not limited to collecting, storing, holding, using, amending or transferring it. Natali Healthcare Solutions Uk Ltd and its associated companies does not need to be doing anything actively with personal data - at the point Natali Healthcare Solutions Uk Ltd and its associated companies collects it, it is processing it

### 6.6 Special Categories of Data

- A term for personal data that is sensitive and personal in nature
- Special categories of data include, but are not limited to, medical and health records (including information collected as a result of providing health care services), genetic and biometric data, and information about a person's religious beliefs, ethnic origin and race, sexual orientation, trade union membership and political views



## Key Facts - Professionals

Professionals providing this service should be aware of the following:

- The privacy policy sets out the way Natali Healthcare Solutions Uk Ltd and its associated companies processes personal data



## Key Facts - People affected by the service

People affected by this service should be aware of the following:

- The privacy policy sets out the way in which Natali Healthcare Solutions Uk Ltd and its associated companies processes personal data provided to it by individuals including Service Users



## Further Reading

As well as the information in the 'underpinning knowledge' section of the review sheet we recommend that you add to your understanding in this policy area by considering the following materials:

Website Privacy and Cookies Policy and Procedure  
Data Security and Data Retention Policy and Procedure



## Outstanding Practice

To be 'outstanding' in this policy area you could provide evidence that:

- Natali Healthcare Solutions UK Ltd and its associated companies has modified the template privacy policies to ensure that they include all information relevant to the processing of personal data by Natali Healthcare Solutions UK Ltd and its associated companies
- Natali Healthcare Solutions UK Ltd and its associated companies confirms satisfaction with all parties regarding fair processing
- There is evidence of a high level of awareness regarding fair processing and Natali Healthcare Solutions UK Ltd and its associated companies shares understanding and knowledge with others
- The wide understanding of the policy is enabled by proactive use of the QCS App



## Forms

The following forms are included as part of this policy:

| Title of form                                     | When would the form be used?   | Created by |
|---|--|------------|
| Template Data Privacy Policy - Employees - GDPR09 | To help employees understand what information is collected, why it is collected it and how they can update, manage, export and delete their information.     | QCS        |
| Template Data Privacy Policy - External - GDPR09  | To help third parties understand what information is collected, why it is collected it and how they can update, manage, export and delete their information. | QCS        |

Nobilis Care Southampton  
Threefield House, Threefield Lane, N/A, Southampton, N/A, SO14 3LP

## Natali Healthcare Solutions Uk Ltd and its associated companies

### Privacy Policy – Employees

[This policy should be circulated to employees once it has been reviewed by Natali Healthcare Solutions Uk Ltd and its associated companies and updated if necessary]

This policy applies to current and former employees, workers and contractors. This policy does not form part of any contract of employment or other contract to provide services. We may update this policy at any time but if we do so, we will provide you with an updated copy of this policy as soon as reasonably practical.

It is important that you read and retain this policy so that you are aware of how and why we are using that information and what your rights are under the data protection legislation.

When Natali Healthcare Solutions Uk Ltd and its associated companies processes your personal data, we comply with the Data Protection Act 2018 ('DPA') and the UK GDPR (the DPA and UK GDPR are together referred to as the 'Data Protection Legislation').

Your personal data includes all the information we hold that identifies you or is about you, for example, your name, email address, postal address, date of birth, location data, and in some cases, opinions that we document about you, as well as special categories of data including, but not limited to, medical and health records and information about your religious beliefs, ethnic origin and race, sexual orientation and political views. It may also include opinions about you, opinions given by you and any other information from which we learn something about you *[Update as necessary to reflect the personal data that is being processed about employees]*.

Everything we do with your personal data counts as processing it - including collecting, storing, amending, transferring and deleting it. We therefore comply with the data protection legislation to make sure that your information is properly protected and used appropriately.

This privacy policy provides information about the personal data we process, why we process it and how we process it.

### **Our responsibilities**

Natali Healthcare Solutions Uk Ltd and its associated companies is the controller of the personal data you provide. We have appointed . as . and they will have day to day responsibility for ensuring that we comply with the data protection legislation and for dealing with any requests we receive from individuals exercising their rights under the data protection legislation. *[This can be updated to reference another job title as having responsibility for compliance with data protection legislation where no DPO has been appointed. If possible, avoid referencing a named individual in case that individual ceases to have responsibility or leaves Natali Healthcare Solutions Uk Ltd and its associated companies].*

### **Why do we process your personal data?**

We process your personal data for HR, employment and administrative purposes. We need your personal data to make sure you have all you need to be able to work at Natali Healthcare Solutions Uk Ltd and its associated companies, to make sure you are safe and secure at work and to make sure you receive all the benefits and rights to which you are entitled.

We process your personal data on a number of grounds including, but not limited to, our legitimate interests, our contract with you, our legal obligations and our rights and responsibilities as your employer. More information about the types of data we process and the grounds for processing are set out in the table below. *[Update the table below as necessary to ensure that it correctly reflects the different types of personal data being processed about employees. Some types of data may need to be deleted and others may need to be added. The grounds for processing are likely to be correct for most organisations but each should be considered and amended if necessary].*



Nobilis Care Southampton  
Threefield House, Threefield Lane, N/A, Southampton, N/A, SO14 3LP

| Type of Data   | Grounds for Processing   |
|--|--|
| Identity data such as your first name, middle names, last name, date of birth and gender   | Legal obligation   |
| Marital status and title   | Legitimate interests   |
| Contact data such as your postal address, email address and telephone numbers  | Legitimate interests   |
| Immigration checks   | Legal obligation   |
| Financial data including your bank account details, payroll records and tax status information   | Legal obligation   |
| National Insurance number  | Legal obligation   |
| Next of kin and emergency contact information  | Legitimate interests   |
| Information about your dependants  | Contractual requirement  |
| Background data such as your education, career background and work experience  | Legitimate interests   |
| Personal information such as your skills and qualities   | Legitimate interests   |
| Salary, annual leave and pension information   | Legal obligation   |
| Benefits information including life assurance and ill health cover   | Contractual requirement  |
| Start date and, if different, the date of your continuous employment   | Legal obligation   |
| Leaving date   | Legal obligation   |
| Your reason for leaving  | Legitimate interests   |
| Location of employment or workplace  | Legal obligation   |
| Copy of passport   | Legal obligation   |
| Employment records including job titles and work history   | Legitimate interests   |
| Training records   | Legal obligation or legitimate interests, depending on the type of training  |
| Information about working hours and holidays   | Legal obligation   |
| Maternity and paternity leave information  | Legal obligation   |
| Performance information  | Legitimate interests   |
| Disciplinary and grievance information   | Legal obligation   |
| Accident records   | Legal obligation   |
| CCTV images (more information is set out below)  | Legitimate interests   |
| Information about your ethnicity/racial background   | Provision of this information is voluntary and therefore collected on the grounds of your consent <i>[If this information is not collected on the grounds of consent (including if the employee is required to provide the information), this will need to be updated to reflect one of the grounds for processing special categories of data. If the processing is collected anonymously, it is not personal data and can therefore be deleted from this table]</i> |
| Special categories of data to the extent we need such information to make sure you are comfortable and safe at work including information relating to your health and medical conditions | Required for us to meet our obligations and exercise our rights as your employer   |
| Any other information included on any CV, application or covering letter you provided to us  | Consent on the basis that the information was provided voluntarily   |

Nobilis Care Southampton  
Threefield House, Threefield Lane, N/A, Southampton, N/A, SO14 3LP

Where we rely on your consent to process your information you may withdraw your consent at any time. This will not affect the lawfulness of any processing we carried out prior to you withdrawing your consent.

### **Who will receive your personal data?**

We only transfer your personal data to the extent we need to. Recipients of your personal data include:

- *[insert any potential recipients or categories of recipients such as payroll providers, pension providers, insurers, healthcare providers, hosted data centres, third parties that provide, for example, benefits/perks,]*

We do not transfer your personal data outside of the EEA. *[If Natali Healthcare Solutions Uk Ltd and its associated companies transfers personal data outside of the EEA, delete this sentence and include the paragraph below instead].*

We may transfer your personal data outside of the EEA to *[name of recipient of data outside EEA]*. *[A finding of adequacy has been made in respect of [relevant country], which means the UK Government is satisfied that any data transferred to [relevant country] will be adequately protected]. [We will transfer your personal data on the basis of safeguards included in a written agreement between Natali Healthcare Solutions Uk Ltd and its associated companies and the recipient of your personal data [This paragraph should be included if Natali Healthcare Solutions Uk Ltd and its associated companies transfers personal data outside the EEA. There are a number of optional clauses within this paragraph. Natali Healthcare Solutions Uk Ltd and its associated companies will need to consider the location of the recipient and the grounds on which personal data is transferred and update this paragraph accordingly].*

### **How long will we keep your personal data?**

We will retain your personal data for *[confirm retention period if you have opted for one overarching retention period. If you have multiple retention periods for employees, you may refer to a separate retentions schedule which could be attached to this policy or available on request. There must be valid reasons to retain the personal data for the chosen period of time.*

*Personal data must not be retained 'just in case' it is needed in the future. Further guidance about appropriate retention periods for employee and HR personal data is included in the Data Security and Data Retention Policy and Procedure].*

Your information will be kept securely at all times. Following the end of the relevant retention period, your files and the personal data covered by the retention period will be permanently deleted or destroyed.

### **What are your rights?**

You benefit from a number of rights in respect of the personal data we hold about you. We have summarised the rights which may be available to you below, depending on the grounds on which we process your data. More information is available from the Information Commissioner's Office website (<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>). These rights apply for the period in which we process your data. There are certain caveats and exemptions to some of your rights which may mean that, in some circumstances, you may not be entitled to exercise them. If we believe that is the case upon receipt, we will let you know.

#### **1. Access to your data**

You have the right to ask us to confirm that we process your personal data, as well as access to and copies of your personal data. You can also ask us to provide a range of information about the ways in which we process your data, although most of that information corresponds to the information set out in this privacy policy.

#### **2. Rectification of your data**

If you believe personal data that we hold about you is inaccurate or incomplete, you can ask us to rectify that information.

#### **3. Right to be forgotten**

In some circumstances, you have the right to ask us to delete personal data we hold about you.

#### **4. Right to restrict processing**

In some circumstances, you are entitled to ask us to suppress processing of your personal data. This means we will stop actively processing your personal data but we do not have to delete it.

#### **5. Data portability**

You have the right to ask us to provide your personal data in a structured, commonly used and machine-readable format so that you are able to transmit the personal data to another data controller.

#### **6. Right to object**

You are entitled to object to us processing your 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/or
- For the purposes of scientific or historical research and statistics

*[You may specify here that you do not intend to use personal data to send direct marketing and/or for scientific or historical research and statistics, if that is the case]*

### **Automated decision making**

Automated decision making means making a decision solely by automated means without any human involvement.

*[Automated decision making includes, for example, an online credit reference check that makes a decision based on information inputted without any human involvement. It would also include the use of 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). Choose between the following two clauses for the privacy policy:]*

*[If Natali Healthcare Solutions Uk Ltd and its associated companies does not carry out automated decision making, delete this sentence and include the sentence above. If it does carry out automated decision making, provide further information here].*

We do not carry out any automated decision making using your personal data. *[If Natali Healthcare Solutions Uk Ltd and its associated companies carries out automated decision making, delete this sentence and complete the section below].*

We carry out the following types of automated decision making using your personal data: *[If Natali Healthcare Solutions Uk Ltd and its associated companies does not carry out automated decision making, delete this sentence and include the sentence above. If it does carry out automated decision making, provide further information here].*



Nobilis Care Southampton  
Threefield House, Threefield Lane, N/A, Southampton, N/A, SO14 3LP

## **Your right to complain about our processing**

Nobilis Care Southampton  
Threefield House, Threefield Lane, N/A, Southampton, N/A, SO14 3LP

If you think we have processed your personal data unlawfully or that we have not complied with UK GDPR, please get in touch with us so that we can help. You may also report your concerns to the supervisory authority in your jurisdiction. The supervisory authority in the UK is the Information Commissioner's Office ("ICO"). You 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?**

If you have any questions or would like more information about the ways in which we process your data, please contact *[insert name/job role/email address]*.

Signed: \_\_\_\_\_

Signed: \_\_\_\_\_

**On behalf of Natali Healthcare Solutions Uk Ltd and its associated companies      Employee**

Date: \_\_\_\_\_

Date: \_\_\_\_\_

Nobilis Care Southampton  
Threefield House, Threefield Lane, N/A, Southampton, N/A, SO14 3LP

## Natali Healthcare Solutions Uk Ltd and its associated companies

### Privacy Policy – External

[This policy should be circulated to non-employees, including Service Users, although Natali Healthcare Solutions Uk Ltd and its associated companies should consider the extent to which the provisions are applicable to Service Users and other contacts. If necessary, Natali Healthcare Solutions Uk Ltd and its associated companies should use more than one privacy policy for non-employees.]

When Natali Healthcare Solutions Uk Ltd and its associated companies processes your personal data, it is required to comply with the Data Protection Act 2018 ('DPA') and the UK GDPR (the DPA and UK GDPR are together referred to as the 'Data Protection Legislation').

Your personal data includes all the information we hold that identifies you or is about you, for example, your name, email address, postal address, date of birth, location data and in some cases, opinions that we document about you, as well as special categories of data, including but not limited to, medical and health records, Care Plans and information about your religious beliefs, ethnic origin and race, sexual orientation and political views. It may also include opinions about you, opinions given by you and information from which we learn something about you *[Update as necessary to reflect the personal data that is being processed about the data subjects to whom this data privacy policy will be provided]*. Everything we do with your personal data counts as processing it - including collecting, storing, amending, transferring and deleting it. We comply with the data protection legislation to make sure that your information is properly protected and used appropriately.

This privacy policy provides information about the personal data we process, why we process it and how we process it.

### **Our responsibilities**

Natali Healthcare Solutions Uk Ltd and its associated companies is the controller of the personal data you provide. We have appointed . as . and they will have day to day responsibility for ensuring that we comply with the data protection legislation and for dealing with any requests we receive from individuals exercising their rights under the data protection legislation. *[This can be updated to reference another job title as having responsibility for compliance with data protection legislation where no DPO has been appointed. If possible, avoid referencing a named individual in case that individual ceases to have responsibility or leaves Natali Healthcare Solutions Uk Ltd and its associated companies].*

### **What personal data do we process about you?**

***[Note: Natali Healthcare Solutions Uk Ltd and its associated companies should include as much information as possible about the types of data it processes. Some examples are included below but these will need to be reviewed and updated on a case-by-case basis]***

We process your personal data in order to provide you with the services you have requested, to fulfil the contract we have entered into with you and/or to receive services or goods from you. We may also process your personal data to respond to any queries or comments you submit to us and to correspond with you on a day-to-day basis. *[Note, this paragraph tries to cover all bases including provision and receipt of services. Natali Healthcare Solutions Uk Ltd and its associated companies may feel it is more appropriate to use more than one privacy policy for non-employees].*

If we do not receive the personal data from you, we may be unable to fulfil our obligations to you.

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

#### • [Service Users]

[Personal data that we may process about you (depending on the extent of the information you have provided to us) includes:

- Identity data such as your first name, middle names, last name, marital status, title, date of birth and gender
- Contact data such as your address, email address and telephone numbers
- Financial data including your bank account and payment card details
- Special categories of data including information about your medical background and health and diversity/equality information such as your race and ethnicity
- Opinions about you, opinions given by you and other information from which we learn something about you

We process most of your information on the grounds of consent from you, legitimate interests (such as *[please insert a description of the legitimate interests you are pursuing when you process personal data]*), performance of a contract we have entered into with you, protection of vital interests of an individual 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. *[Please delete any that are not appropriate, particularly if Natali Healthcare Solutions Uk Ltd and its associated companies chooses to use more than one data privacy policy depending on the type of data subject].*

#### • [Suppliers]

[Personal data that we may process about you includes:

- Identity data such as your first name, middle names, last name, marital status, title, date of birth and gender
- Contact data such as your billing address and delivery address (whether residential or your company address), email address and telephone numbers
- Financial data including your bank account and payment card details (except to the extent the financial information is company rather than personal information); and
- Transaction data including details about payments made to you (where you are an individual)]

We process most of your information on the grounds of our legitimate interests (including a business relationship with you or the company for which you work) and fulfilment of our contract with you (where you are an individual).

Nobilis Care Southampton  
Threefield House, Threefield Lane, N/A, Southampton, N/A, SO14 3LP

Any information we process about the company for which you work rather than you as an individual is not covered by this data privacy policy.

Nobilis Care Southampton  
Threefield House, Threefield Lane, N/A, Southampton, N/A, SO14 3LP

- [Candidates]

[Personal data that we are likely to process about you includes:

- Identity data such as your first name, middle names, last name, marital status, title, date of birth and gender
- Contact data such as your postal address, email address and telephone numbers
- Background data such as your education, career background and work experience
- Personal information such as your skills and qualities
- Any other information that you include on any CV, application or covering letter you send to us. If this information includes special categories of data, we will process that information on the grounds of consent because you have chosen to provide it to us.]

We process most of your information on the grounds of our legitimate interests to determine whether or not we have a suitable vacancy for you, or on the grounds of our legal obligations.

If we obtain consent from you to the processing of your personal data, you can withdraw your consent at any time. This will not affect the lawfulness of any processing we carried out prior to you withdrawing your consent.

#### **Who will receive your personal data?**

We only transfer your personal data to the extent we need to. Recipients of your personal data include:

- *[insert any potential recipients or categories of recipients]*

We do not transfer your personal data outside of the EEA. *[If Natali Healthcare Solutions Uk Ltd and its associated companies transfers personal data outside of the EEA, delete this sentence and include the paragraph below instead].*

We may transfer your personal data outside of the EEA to *[name of recipient of data outside EEA]*. [A finding of adequacy has been made in respect of *[relevant country]*, which means the UK Government is satisfied that any data transferred to *[relevant country]* will be adequately protected]. [We will transfer your personal data on the basis of safeguards included in a written agreement between Natali Healthcare Solutions Uk Ltd and its associated companies and the recipient of your personal data. *[This paragraph should be included if Natali Healthcare Solutions Uk Ltd and its associated companies transfers personal data outside the EEA. There are a number of optional clauses within this paragraph. Natali Healthcare Solutions Uk Ltd and its associated companies will need to consider the location of the recipient and the grounds on which personal data is transferred and update this paragraph accordingly].*

#### **How long will we keep your personal data?**

We will retain your personal data for *[confirm retention period if you have opted for one overarching retention period. If you have multiple retention periods for different types of external contacts (which is likely to be the case), you may refer to a separate retentions schedule which could be attached to this policy or available on request, or separate out the different external contacts and the corresponding retention periods within this policy. There must be valid reasons to retain the personal data for the chosen period of time. Personal data must not be retained 'just in case' it is needed in the future. Further guidance about appropriate retention periods for employee and HR personal data is included in the Data Security and Data Retention Policy and Procedure]*. Your information will be kept securely at all times. Following the end of the relevant retention period, your files and the personal data covered by the retention period will be permanently deleted or destroyed.

#### **What are your rights?**

You benefit from a number of rights in respect of the personal data we hold about you. We have summarised the rights which may be available to you below, depending on the grounds on which we process your data. More information is available from the Information Commissioner's Office website (<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>). These rights apply for the period in which we process your data. There are certain caveats and exemptions to some of your rights which may mean that, in some circumstances, you may not be entitled to exercise them. If we believe that is the case upon receipt, we will let you know.

##### **1. Access to your data**

You have the right to ask us to confirm that we process your personal data, as well as access to and copies of your personal data. You can also ask us to provide a range of information about the ways in which we process your data, although most of that information corresponds to the information set out in this privacy policy.

##### **2. Rectification of your data**

If you believe personal data that we hold about you is inaccurate or incomplete, you can ask us to rectify that information.

##### **3. Right to be forgotten**

In some circumstances, you have the right to ask us to delete personal data we hold about you.

##### **4. Right to restrict processing**

In some circumstances, you are entitled to ask us to suppress processing of your personal data. This means we will stop actively processing your personal data but we do not have to delete it.

##### **5. Data portability**

You have the right to ask us to provide your personal data in a structured, commonly used and machine-readable format so that you are able to transmit the personal data to another data controller.

##### **6. Right to object**

You are entitled to object to us processing your 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/or
- For the purposes of scientific or historical research and statistics

*[You may specify here that you do not intend to use personal data to send direct marketing and/or for scientific or historical research and statistics, if that is the case]*

Nobilis Care Southampton  
Threefield House, Threefield Lane, N/A, Southampton, N/A, SO14 3LP

**Automated decision making**

Automated decision making means making a decision solely by automated means without any human involvement. *[Automated decision making includes, for example, an online credit reference check that makes a decision based on information inputted without any human involvement. Choose between the following two clauses for the privacy policy:]*

We do not carry out any automated decision making using your personal data. *[If Natali Healthcare Solutions Uk Ltd and its associated companies carries out automated decision making, delete this sentence and complete the section below].*

We carry out the following types of automated decision making using your personal data: *[If Natali Healthcare Solutions Uk Ltd and its associated companies does not carry out automated decision making, delete this sentence and include the sentence above. If it does carry out automated decision making, provide further information here].*

**Your right to complain about our processing**

If you think we have processed your personal data unlawfully or that we have not complied with UK GDPR, please get in touch with us so that we can help. You may also report your concerns to the supervisory authority in your jurisdiction. The supervisory authority in the UK is the Information Commissioner's Office ('ICO'). You 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?**

If you have any questions or would like more information about the ways in which we process your data, please contact *[insert name/job role/email address]*.