

UK Independent Medical Limited Privacy Notice – Employees

This privacy notice sets out how we use any personal data that we process about you and applies to all current and former employees (“Employee”). This notice will also be applicable to anyone whose personal data has been processed as part of our recruitment process (“Applicant”).

This privacy notice is applicable to the employees and applicants of the following businesses:

UKIM MLR
 Pagine8
 UKIM Health
 UKIM Occupational Health

Examworks UK is a brand name of the above businesses. Your contract will be with the business directly.

The Purpose for Processing:

We will need to process your personal data for the following reasons:

Stage	Processing Activity
Pre-Employment	<p>Making a decision about your recruitment or appointment. This can include managing your CV, processing an application, processing your personal data as part of conducting an interview and any competency based assessments we may ask you to complete.</p> <p>To check whether you are legally entitled to work in the UK.</p> <p>To carry out a DBS and background checks.</p>
During Employment	<p>To process your personal data for the purpose of paying you and to ensure that the appropriate tax and national insurance contributions have been deducted.</p> <p>To process your personal data as part of providing you with any employee specific benefits (e.g. Reward Gateway)</p> <p>To enrol you in a pension arrangement in accordance with our statutory automatic enrolment duties and liaise with your pension provider as required.</p> <p>For business management and planning, including accounting and auditing.</p> <p>For the purpose of performance management and to make decisions about salary reviews and compensation.</p> <p>To facilitate in your education, training and development requirements.</p> <p>For absence management, specifically sickness absence.</p>

	<p>To comply with health and safety obligations.</p> <p>To monitor your use of our information and communication systems in line with the Group's Information Security and Acceptable Use Policy.</p> <p>Equal opportunities monitoring.</p> <p>To gather and manage evidence for possible grievance or disciplinary hearings.</p> <p>To conduct an exit interview to gather feedback.</p>
<p>Post-Employment</p>	<p>To process your personal data in line with any legal obligations we are required to comply with. This will include our obligations to you in relation to the processing of your personal data.</p> <p>To form a defence of any legal claim that may be brought against us.</p> <p>To contact you to perform an exit interview to gather feedback. In the event of this specific process occurring post-employment, we would ask for your consent prior to participation.</p>

We can assure you that we will only ever process the minimum personal data required to carry out the processing activities identified above.

Lawful Basis for Processing

We will process your personal data in line with the following lawful bases:

Legitimate Interests

We believe that we have a genuine and legitimate reason to process your personal data as you wish to enter, or have entered into a contract of employment with us. We do not expect that processing your personal data will harm any of your rights and interests.

Legal Obligations

We may be required to process your personal data to comply with our legal obligations. This can include complying with a Subject Access Request you have made or supplying personal data to the HMRC following a request.

Categories of Recipients

- We may share information within our corporate group headed up by ExamWorks Inc. Limited who are located in the US.

As the transfer will be outside of the European Economic Area and therefore outside of the jurisdiction of European legislation we have completed a comprehensive audit and due diligence exercise to ensure that there are appropriate safeguards in place for the protection and

management of personal data in line with your rights and freedoms. We have also adopted the model EU clauses to facilitate the lawful transfer of personal data.

- We will never share your information with any third parties that intend to use your personal data for their own purpose, other than what they are required to by law.
- We may need to transfer your personal data to a nominated third parties under our own legal obligations (e.g. HMRC).
- We will also share your personal data with selected third parties who assist us in our processing activities, and a small number of these processors are based outside the EEA (in locations including the US and India). As personal data will be processed outside of the jurisdiction of European legislation, the transfers to the third parties in question are subject to appropriate safeguards contained in the contract between us and the supplier.
- All third parties are fully vetted to ensure that your personal data is only shared and stored with third parties that comply with all applicable Data Protection Regulations, including the General Data Protection Regulation and the Data Protection Act.

Retention Period

We will retain your personal data:

Applicant

- For 6 months following the completion and outcome of the recruitment exercise.

Employee

- During the course of your employment.
- For a further 7 years following the termination of your employment.

If you are a former employee, we will only use your personal data to the extent necessary to comply with our legal obligations (E.g. for HMRC financial accounting obligations as well as to enable us to defend any claim that may be brought against us in respect of the work we undertake as a business).

Your Rights:

Under the Data Protection Act, you have the following rights in relation to your personal data.

- **Right to Access** - You have a right to request a copy of your personal data.
- **Right to Rectification** - You have the right to ask us at any time to make any corrections or remove any personal data that you believe is inaccurate.
- **Right to Erasure** - You have the right to request the erasure of personal data. However, we may still need to retain personal data to comply with our legal obligations. In the event of a request we will provide you with full details of the personal data that we are required to retain.
- **Right to Restriction** - You have the right to request a restriction in the processing of your personal data. However, we may still be required to process personal data to comply with our legal obligations and to fulfil our obligations in respect of your contract of employment. In the event of a

request we will provide you with full details of the personal data that we are required to continue processing.

- **Right to Objection** - You have the right to object to the processing of your personal data. However, we may still be required to process personal data to comply with our legal obligations and to fulfil our obligations in respect of your contract of employment. In the event of a request we will provide you with full details of the personal data that we are required to continue processing.

We will aim to respond to any requests relating to your rights without undue delay and in any case within 1 calendar month of receipt of your request. We may ask you to confirm your identity so that we can validate a request. If you would like to make a request, please email or write to us using the contact details provided below.

If we are unable to comply with a request for any reason, then we will provide you with a full justification in writing within 1 calendar month of receipt of your request.

Profiling

We may from time to time use your personal data to undertake automated analysis which can have legal or similarly significant effects on you. The final decisions in relation to any of the processing listed below will be undertaken by an individual and not through an automated process.

In the table below we detail what decisions we might take, the personal data used to take those decisions, and how that decision might affect you.

Type of Analysis	Data Subject	Data used, where it comes from and why it's relevant.	How it might affect you.
Sickness absence triggers	Employee	Cascade System	Would be applied in accordance with the Attendance Management Policy and therefore could affect your employment if you exhaust all stages. The management team and HR would be involved in any decisions that arise following analysis.

Complaints

If you are unhappy about any aspect of our process and you would like to file a complaint, please contact us using the details below.

Alternatively, if you would like to make a complaint or report a concern about the way in which we have processed your personal data then please contact the Information Commissioner's Office who will be able to provide further assistance.

Changes to our Privacy Policy

We keep our privacy policy under regular review and we will notify you of any updates to the privacy policy. A copy of the most up to date privacy policy will be placed on the web page. This privacy policy was last updated on 29th October 2020

Contact Us

If you have any further questions or would like to raise any concerns about the way in which your personal data has been processed, please feel free to contact our Data Protection Officer. Alternatively, for any specific HR related queries please use the details below to contact our HR Director.

HR Director: Tamsyn Haselden

Email Address: tamsyn.haselden@examworks.co.uk

Email: compliance@examworks.co.uk

Write to us:

[HR Department/Legal and Compliance Department]
[UKIM MLR/Pagin8/UKIM Health/UKIM Occupational Health and Wellbeing],
Brenner House,
Rainton Bridge Business Park,
Houghton-le-Spring,
DH4 5RA