

## **Our Privacy Policy**

Simplyhealth respects your privacy and is committed to protecting your personal data. This privacy policy explains in detail the way in which any personal data you provide to us is used and kept safe by Simplyhealth. We know there's a lot of information here, but we want you to be fully informed about your rights, and how Simplyhealth uses your data, so please take the time to read it.

### **Who 'we' are**

Simplyhealth People process your data when applying for a role with us.

### **How we use your data**

We will only use your personal data when the law allows us to, we may process your personal data for any of the following circumstances:

- 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
- To comply with any legal obligations which we are subject to
- Consent, where you have given clear consent for us to process your personal data for a specific purpose. For example, applying for a specific Simplyhealth vacancy
- Necessary for entering into or performance of a contract with you
- Necessary for reasons of substantial public interest

### **Purposes for which we will use your personal data**

- To process your application and manage all aspects of recruitment activity, such as reviewing your application and identity and background checking.
- To protect our interests as an employer
- To detect and prevent fraud
- To provide you with information regarding Simplyhealth vacancies

### **For roles with a senior management function or certified employees, there are some specific circumstances which apply to employment vetting**

Prior to your employment, Simplyhealth will need to conduct checks to ensure you can continue to perform your role; you may be asked to supply in writing:

- a) evidence of qualifications, financial and managerial experience, credit worthiness, competence and character; and
- b) any duly completed form or questionnaire in whatever form the Company and/or any Group Company considers necessary to meet legal and regulatory requirements.

These checks are a regulatory requirement, and since the GDPR allows for processing required "for compliance with a legal obligation to which the controller is subject," there is no conflict between the GDPR and the regulatory reference requirements of the SMCR.

### **Disclosure of your personal data**

We may have to share your personal data with the parties set out below for those purposes set out above.

- To persons who provide a service to us or act as our agents
- To anyone to whom we may transfer rights and duties under this policy

- To third parties who act on behalf of Simplyhealth
- Where we have a duty to provide that data (such as to regulatory bodies, who require reporting of processing activities in certain circumstances)
- To fraud detection agencies and other third parties who operate and maintain fraud detection registers

### **Protecting your personal data**

By law we must have measures in place to protect data. As a result, we have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### **Retention of your Personal Data**

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

If you would like more information about how long we will keep your information for, please contact us at [thedataprotectionofficer@simplyhealth.co.uk](mailto:thedataprotectionofficer@simplyhealth.co.uk)

### **Your rights around the use of your personal data**

Under Data Protection law, you have various rights in relation to your own data. You have the right to:

- **Request access to your personal data**
- **Request correction of the personal data that we hold about you**
- **Request erasure of your personal data\***
- **Object to processing of your personal data**
- **Request restriction of processing of your personal data**
- **Request the transfer of your personal data to you or to a third party**
- **Right to object**
- **Rights related to any automated decision making and profiling**

\* Please note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request

If you wish to exercise any of the rights set out above, please contact us at [thedataprotectionofficer@simplyhealth.co.uk](mailto:thedataprotectionofficer@simplyhealth.co.uk)

### **Complaints and how to contact us**

If you would like to discuss any aspect of this privacy notice or anything else about the personal data we collect on you, please contact us using the details below:

Email: [thedataprotectionofficer@simplyhealth.co.uk](mailto:thedataprotectionofficer@simplyhealth.co.uk)

Post: The Data Protection Officer, Hambleden House, Waterloo Court, Andover, Hampshire  
SP10 1LQ

You have a right to make a complaint at any time to your local privacy supervisory authority. Simplyhealth's main establishment is in the UK, where the local supervisory authority is the Information Commissioner's Office (ICO). You can also contact the Information Commissioner's Office using their online form: <https://ico.org.uk/global/contact-us/email/>

**([www.ico.org.uk](http://www.ico.org.uk))**

However, we would appreciate the chance to address your concerns before you approach the ICO, so please contact us in the first instance.