EDGEBITS Cutting Edge Healthcare IT	Date adopted	November 2021
EDGEBITS Privacy Notice	Review frequency	Annual
EDGEBITS PRIVACY POLICY NOTICE	Reviewed & adopted	December 2023
	Review date	December 2024

This privacy policy notice is served by:

EDGEBITS Ltd, 92 Friern Gardens, Wickford, Essex SS12 OH under the website; <u>https://edgebits.co.uk.</u>

The purpose of this policy is to explain to you how we control, process, handle and protect your personal information through the business and while you browse or use our website.

Introduction

As part of the services we offer, we are required to process personal data about our staff, our clients and, in some instances our clients' staff.

"Processing" can mean collecting, recording, organising, storing, sharing or destroying data. We are committed to being transparent about why we need your personal data and what we do with it. This information is set out in this privacy notice. It also explains your rights when it comes to your data.

If you have any concerns or questions, please contact us: <u>Ryan.Edridge@EDGEBITS.co.uk</u>

What data do we have?

So that we can provide a safe and professional service, we need to keep certain records about you. We may process the following types of data:

- Your basic details and contact information e.g. your name, email address, telephone number.
- Your financial details e.g. details of how you pay us for the services we provide for you or on your behalf.

How we get the personal information

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- You have made an enquiry to us.
- You wish to attend, or have attended, an event.
- You have applied for a job or contract role with us.
- You are representing your organisation.

Why do we have this data?

We need this data so that we can provide high-quality service and support. By law, we need to have a lawful basis for processing your personal data.

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We may process Personal Data under the following conditions:

- Consent: You have given your consent for processing Personal Data for one or more specific purposes. We will continue to process your information under this basis until you withdraw consent, or it is determined your consent no longer exists
- Performance of a contract: Provision of Personal Data is necessary for the performance of an agreement with you and/or for any pre-contractual obligations thereof.
- Legal obligations: Processing Personal Data is necessary for compliance with a legal obligation to which the Company is subject.
- Legitimate interests: Processing Personal Data is necessary for the purposes of the legitimate interests pursued by the Company.

If, as determined by us, the lawful basis upon which we process your personal information changes, we will notify you about the change and any new lawful basis to be used if required. We shall stop processing your personal information if the lawful basis used is no longer relevant.

Use of your personal data

We may use Personal Data for the following purposes:

- to provide and maintain our service, including to monitor the usage of our service.
- For the performance of a contract: the development, compliance and undertaking of the purchase contract for the products, items or services you have purchased or of any other contract with us through the service.
- to contact you: to contact you by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.
- to provide you with news and general information about other goods, services and events which we offer.
- To manage Your requests: To attend and manage your requests to us.
- For business transfers: we may use your information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal data held by us about our service users is among the assets transferred.
- For other purposes: we may use your information for other purposes, such as data analysis and to evaluate and improve our service, products and services.

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Where do we process your data?

So that we can provide you with high quality service and support we need specific data. This is collected from or shared with:

- **1.** You or your legal representative(s)
- 2. Third parties.

We do this face to face, via phone, via email, via our website, via post.

Third parties are organisations we might lawfully share your data with. These include:

- Parts of the health and care system such as local hospitals, the GP, the pharmacy, social workers, clinical commissioning groups, and other health and care professionals.
- The Local Authority.
- Organisations we have a legal obligation to share information with i.e. for safeguarding.
- The police or other law enforcement agencies if we have to by law or court order.

How long we store your data

 We will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

Staff/Sub Contractors

What data do we have?

So that we can provide a safe and professional service, we need to keep certain records about you. We may record the following types of data:

- Your basic details and contact information e.g. your name, address, date of birth, National Insurance number, Tax Code, emergency contact details and next of kin
- Your financial details e.g. details so that we can pay you, insurance, pension and tax details
- Your training records, education and qualifications, employment history, any disciplinary action
- employment terms and conditions (e.g. pay, hours of work, holidays, benefits, absence)
- any accidents connected with work.

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We also record the following data which is classified as "special category":

- Health and social care data about you, which might include both your physical and mental health data we will only collect this if it is necessary for us to know as your employer, e.g. fit notes or in order for you to claim statutory maternity/paternity pay
- We may also, with your permission, record data about your race, ethnic origin, sexual orientation or religion.

As part of your application you may – depending on your job role – be required to undergo a Disclosure and Barring Service (DBS) check (Criminal Record Check). We do not keep this data once we've seen it.

Why do we have this data?

We require this data so that we can contact you, pay you and make sure you receive the training and support you need to perform your job. By law, we need to have a lawful basis for processing your personal data.

We process your data because:

• We have a legal obligation under UK employment law.

We process your special category data because

• It is necessary for us to process requests for sick pay or maternity pay.

If we request your criminal records data, it is because we have a legal obligation to do this due to the type of work you do. This is set out in the Data Protection Act 2018 and the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975. We do not keep a record of your criminal records information (if any). We do record that we have checked this.

We may also process your data with your consent. If we need to ask for your permission, we will offer you a clear choice and ask that you confirm to us that you consent. We will also explain clearly to you what we need the data for and how you can withdraw your consent.

Where do we process your data?

As your employer we need specific data. This is collected from or shared with:

- **1.** You or your legal representative(s)
- 2. Third parties.

We do this face to face, via phone, via email, via our website, via post, via application forms.

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Third parties are organisations we have a legal reason to share your data with. These include:

- Her Majesty's Revenue and Customs (HMRC)
- Organisations we have a legal obligation to share information with i.e. for safeguarding, the CQC
- The police or other law enforcement agencies if we have to by law or court order
- The DBS Service
- The police or other law enforcement agencies if we have to by law or court order.

Our Website

In order to provide you with the best experience while using our website, we process some data about you.

Your rights

The data that we keep about you is your data and we ensure that we keep it confidential and that it is used appropriately. You have the following rights when it comes to your data:

- 1. You have the right to request a copy of all of the data we keep about you. Generally, we will not charge for this service.
- 2. You have the right to ask us to correct any data we have which you believe to be inaccurate or incomplete. You can also request that we restrict all processing of your data while we consider your rectification request.
- **3.** You have the right to ask that we erase any of your personal data which is no longer necessary for the purpose we originally collected it for.
- 4. You may also request that we restrict processing if we no longer require your personal data for the purpose, we originally collected it for, but you do not wish for it to be erased.
- 5. You can ask for your data to be erased if we have asked for your consent to process your data. You can withdraw consent at any time please contact us to do so.
- 6. If we are processing your data as part of our legitimate interests as an organisation or in order to complete a task in the public interest, you have the right to object to that processing. We will restrict all processing of this data while we look into your objection.
- **7.** You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.
- 8. You have the right not to be subject to automated decision-making including profiling.

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Please contact us at *info@edgebits.co.uk* if you wish to make a request. You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

You also have the right to complain to the ICO if you feel there is a problem with the way we are handling your data.

The ICO's address is: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Helpline number: 0303 123 1113 ICO website: <u>https://www.ico.org.uk</u>