

Privacy Policy

Last updated 01/09/2024

This policy provides an outline of when and why we collect personal information, how we use it and the conditions under which we may disclose it to third parties. It is important that you read this policy together with specific policies that is applicable to your context. Please read the following Privacy Policy to understand how your personal information is treated. From time to time, Kingdom Health may offer new information or services that may affect this policy. If you have any questions or concerns regarding this Privacy Policy, please contact a member of our team, who will process your request accordingly. You can do this via the "Contact Us" area on our website.

If you have any questions regarding this notice or our privacy practices in general, please email us at dataprotection@kingdomhealth.uk

Legal Information

Kingdom Health Private Limited, a company incorporated in England and Wales under number 000000000 whose registered office is at Regus Preston The Docklands, Unit 5, Albert Edward House 3-5The Pavilions, Ashton-on-ribble PrestonPR2 2YB,+44 75269 30592

What is personal data?

Personal data relates to an individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into its possession.

The processing of personal data in the UK is governed the General Data Protection Regulation 2016/679 (the "GDPR") as incorporated into UK law, the Data Protection Act 2018 ("DPA") and also by the Privacy and Electronic Communications (EC Directive) Regulations 2003.

Contact details of the Data Protection Officer ('DPO')

If you have any queries or questions about this notice then please contact our DPO by emailing dataprotection@kingdomhealth.co.uk

What personal data do we collect and how do we collect it?

One of the purposes of this Privacy Policy is to explain how we collect and process personal data. The primary ways we collect information are as follows:

- Visit one of our websites
- Receive healthcare and social care services from us directly or indirectly through other institutions
- Contact us directly, e.g. using email, chat, contact forms or contact centre
- Request marketing information to be sent to you
- Participate in an online survey
- Submit a job application
- Data provided by you as part of our employment onboarding process and subsequent operational processes.
- Provide us feedback
- Visit one of our office locations
- Participate in our outreach activities

We encourage you to read this Privacy Policy. It has been written to ensure you understand how we collect information, how it is safeguarded, what is collected, how it is processed, where it is processed, with whom we may share it, and your rights under the law.

We collect and process a range of information about you. This includes:

Customer Contacts and Authorised contacts of certain Care Recipients:

- Includes your name, photo and contact details via email address and telephone number;

Profile and Skills data of Health Care workers and employees in other roles:

- Includes your photo, name, grade, length of service with Kingdom Health, Vaccinations status (like Covid19, Flu, MMR, Hepatitis B), Skills and training data, Clearance to work data (ID checks, Right to work, DBS checks), Professional registration details (like SSSC);

Healthcare data of Care Recipients:

- Includes your name, photo, contact details, demographic details, health details,
- any contact including a record of the correspondence, call recordings.

Online Interaction data:

- Includes your IP address, operating system and browser type, your traffic data, location data, weblogs and other communication data, the resources that you access and how you interact with the resources.

Interaction data:

- any contact including a record of the correspondence, call recordings, image captured in outreach activities or through surveillance systems.

We collect this information in a variety of ways. For example, data is collected through online forms, mobile app, website cookies, correspondence with you, subscription to our newsletters and event registrations.

To enable the provision of health care services, we may also collect and process other personal data to enable the performance of the contract between you and us. This will be communicated and agreed through specific contract documentation and/or specific privacy notices.

In some cases, we collect personal data about you from third parties, which includes, among others, clients, regulators, law enforcement agencies, background search firms, analytics providers, lead generation companies, hiring platforms, research partners, outreach partners, and event organisers.

We do collect special categories of personal data about specifically information about your health as a health care provider and we do collect information about criminal convictions and offences as part of our hiring and operational process.

How do we process your personal data?

We comply with our obligations under the DPA and GDPR by keeping personal data up to date (subject to your notification of any required updates to your personal data); by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We use your personal data for the following purposes: –

- To operate this website and deliver the services that customers have requested;
- To undertake profiling to enable us to improve the customer experience and tailor the information we provide;
- To carry out our obligations arising from any contracts entered into between you and us;
- To provide health and social care services to you and handle the entire operation lifecycle related to it;
- To meet our legal and regulatory obligations;
- To inform individuals about our services which we believe may be of legitimate interest to you;
- To inform individuals of news, events, activities or services running throughout the year;
- To contact individuals via surveys to conduct research about their opinions of current services or of potential new services that may be offered;
- To notify you about changes to our services;
- To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data);
- To monitor and store communications including email correspondence for the purpose of ensuring compliance with laws, policies and auditing;
- To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you;
- To use data analytics to improve our website, services, marketing, customer relationships and experiences;
- If you are a customer, supplier, employee, contractor or users of our services, then we may use your personal data for other purposes that are described in other privacy notices available on the website or through specific contract documentation.

Lawful Basis for Processing Your Data.

At Kingdom Health, we are committed to processing your personal data only within the parameters allowed by law. We will typically only use your data in the following situations:

- when you provide us with consent to process your personal data, which you may revoke at any time and for any reason;
- when it is necessary for our legitimate interests;
- when we need to comply with legal or regulatory requirements; and
- when we need to fulfill our obligations to provide the contracted services.

Categories of recipients.

Your personal data will be treated as strictly confidential and will only be shared with the recipients detailed below for the purpose stated.

- Customer contacts of our Institutional clients – to enable them to hire you for their open staffing needs
- Authorised contacts of certain care recipients – to communicate on your behalf with us.
- Marketing communication facilitators – to keep you updated on our products and services;
- Online advertising providers – to keep you updated on our products and services;
- Website engagement companies (e.g. live chat) – to help us to assist you and respond to your queries;
- Analytics providers – to help us improve your online experience;
- Third parties for joint promotions with that party – to help us organise events;
- Third Parties acting as our processors or service providers – to enable us to provide the services;
- Third Parties acting as processors or service providers of our Institutional Clients – to enable us to support the Clients' operations;
- Companies within the Kingdom Health –to support the overall provision of our products and services;
- Fraud prevention agencies – to prevent fraud;
- Alternative dispute resolution – for complaint escalation;
- Law enforcement agencies, government bodies, regulatory organisations, courts or other public authorities – where required by law.

Your Rights

Because the data we hold about you is your data, you have the following rights in respect of the personal data we hold about you:

1. Right to Access – this means you can ask us for a copy of all the personal data we hold about you.
2. Correction Right – if you believe any of the information we hold about you is incorrect or out of date, you have the right to correct such information by providing us with the correct up to date information. In addition, you can ask us to delete the incorrect or out of date

information and we will be happy to do so unless we are prevented from doing so by law or regulation.

3. Right to be Forgotten – you have the right to ask us to delete the personal data we hold about you where such data is used for direct marketing purposes or is processed as a result of you consenting to such processing. Please note that where we are obliged to keep your personal data because of a regulatory or legal requirement, we will not be able to delete that data and must continue to retain it.
4. Right to Restrict Processing – in some limited circumstances you have the right to restrict the processing of your data. See examples below:
 1. if you want us to establish the data's accuracy;
 2. where our use of the data is unlawful but you do not want us to erase it;
 3. where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 4. you have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.
5. Right of Objection to Processing - you have the right to object to us using your data for direct marketing purposes and to profiling. For example, if there is something about your situation which makes you want to object to processing as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
6. Right of Data Portability – you have the right to request a copy of the personal data we hold about you in a commonly used and machine-readable format. We can provide your data either to you or to such other third party as you specify in your request.
7. Automated Decision-Making Objection Right – automated decision-making is where a decision is made entirely by technological means without human intervention. We do not use or rely on automated decision-making.

If you would like to exercise any of the above rights, please contact us in writing on marketing@kingdomhealth.uk .

National Data Opt Out for CQC Registered Services

This gives anyone who has received treatment or care from a CQC registered health and adult social care service the ability to stop that organisation from sharing their confidential information, for reasons other than providing their individual care and treatment. Specifically, it would prevent such information being used for the purpose of research or planning.

At this time, we do not share any data for planning or research purposes for which the national data opt-out would apply. The use of Client personal data is, as defined within the Agreement for the Supply of Care Services, fully restricted to the purposes of providing individual care. We review all of the confidential patient information we process on an annual basis to see if this is used for research and planning purposes. If it is, then individuals can decide to stop their information being shared for this purpose.

You can find out more information at <https://www.nhs.uk/your-nhs-data-matters/>.

Cookies

Our website uses cookies to make our site work and to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve it.

A 'cookie' is a small text file which attaches to your hard drive and from which it can store and sometimes track information on how you make use of a particular website.

We may use cookies for administrative purposes such as cataloguing traffic patterns throughout the website and to assign a 'user ID' for this purpose. Cookies, by themselves, cannot be used to find out the identity of any user. If you have a user ID, this will automatically identify your computer to our server when you visit our website, but it will not identify you. Unless you specifically tell us, we will never know who you are, even if we do assign a cookie to your computer.

You may set your browser to automatically reject all cookies. It is also possible to set your browser to notify you if a cookie has been sent to you so that you can accept or reject that particular cookie. However, please note that you may not be able to use the full service on our website or other websites without cookies.

Further detailed information on cookies can be found at: <http://www.allaboutcookies.org/>

Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it, 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, 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, and the applicable legal requirements.

You can ask us to delete your data and we shall address it in a timely manner, subject to legal and regulatory obligations and keep you informed of it. We may anonymise your personal data so that it can no longer be associated with you for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Links to Third party websites

Our Website may also contain links to websites of third-parties. We have no control over the content or operation of these websites, nor do we control the confidentiality or privacy practices of the website operators. Consequently, any personal information you submit through such website is governed by the privacy policies of the website in question. It is therefore your responsibility to find out about the third-party policies in order to protect your personal information when visiting these third-party websites.

Social Sharing

On our website, we use social sharing buttons for services including, but not limited to, Twitter, LinkedIn and Facebook. These allow you to share website pages with your friends via those networks. Whilst you will be asked to login to use these services, this process is handled directly with the social network providers and their databases and servers; Kingdom Health accepts no responsibility for any use of your personally identifiable information and/or any further use of cookies by those social network providers.

Visitors to our social media channels

Kingdom Health has an active presence on several external social channels including Facebook, Instagram, Twitter, LinkedIn and YouTube ("our social media channels") from which we post company news and content which may be of interest to our connections. We may use a third-party scheduling and management tool to post messages.

While Kingdom Health has official profiles on external social media channels, this does not mean that we endorse those channels or the companies that own them, or that we are responsible for their products or services.

If you access external social media channels, you do so at your own risk and Kingdom Health is not responsible for any losses or other damages which you may suffer as a result of its use.

The social media channels we use have their own terms and conditions and you need to comply with those terms as well as ours.

When you use any of our social media channels, we may record and retain information (anonymous or otherwise) about you. This may include your use of our sites and the frequency of your visits. The individual social media channels may also be permitted to share certain information with us in accordance with your personalised privacy settings on those channels.

By using our social media channels and providing us with, or posting personal information to our social media channels, you are agreeing that you accept these terms. If you disagree with any of these terms you should not access our social media channels.

Right to lodge a complaint with ICO

To exercise all relevant rights, or for queries, please in the first instance contact us on the contact details provided above.

Should you have a concern about our information rights practices, you have the right to complain directly to our supervisory authority, the ICO.

Their address and contact details are as follows:

Information Commissioners Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.

Alternatively, you can email them via the following link: [Contact us | ICO](#)

Contact details for data protection authorities in the European Economic Area, are available at https://edpb.europa.eu/about-edpb/board/members_en

Your Obligations

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

We also expect you to honour the privacy rights of individuals whom you interact with. Please take consent from our Care Providers before taking their picture. Please anonymise the public feedback you submit online about Kingdom Health staff so that it does not identify the individual and hurt their interests.

Updates to this Policy

We may update this notice from time to time in response to changing legal, technical or business developments.

When we update our notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make.

You can see when this privacy policy was last updated by checking the “last updated” date displayed at the top of this privacy policy.