

Patient First Complaints Ltd Privacy Notice

Introduction

Patient First Complaints Limited ("we", "us") is the controller of your data. We take privacy and data protection very seriously. This notice sets out how we collect and use your personal data.

Please note that this notice does not form part of your employment or service agreement, and we may update it at any time. If we do update this notice, we will inform you of the changes as soon as practicable.

What personal data do we collect?

We collect, store, and use various personal data, including but not limited to:

- Contact details, date of birth, gender, marital status, emergency contacts.
- National Insurance number, bank/payroll info, salary, benefits, employment dates, location.
- ID documents, CVs, references, job history, performance, grievances.
- System use, CCTV, photographs, driving licence, tax information.

We may also process sensitive data such as:

- Racial/ethnic origin, religion, sexual orientation, political opinions.
- Trade union membership.
- Health data (conditions, absences, benefits).
- Criminal records (if required by law and appropriate for the role).

How do we collect it?

We collect personal information:

- During recruitment (via application forms, agencies, references and from you).
- From pension providers or benefits administrators.
- Through your work activities with us.

Failure to provide required data may prevent us from fulfilling our obligations to you.

How it is used

We will only use your personal information in accordance with the law. We process your data:

- To perform our contract with you.
- To comply with legal obligations.
- Where it is necessary for our legitimate interests (and your rights don't override them).

Occasionally, we may use your data to protect your or others' interests or for official purposes.

The following table summarises how we use your personal data, why, and the legal bases for doing so.

Purpose	Why it's used	Legal Bases
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Recruitment and appointment decisions	To assess suitability for a role	Contract Legitimate Interests
Determining terms of engagement	To agree appropriate employment terms	Contract Legitimate Interests
Employment status assessment (e.g. IR35)	To assess Employment status (e.g. IR35)	Legal Obligation
Right to work checks	To ensure legal eligibility to work in the UK	Legal Obligation Legitimate Interests
Payroll and tax	To pay salary and fulfil tax obligations	Contract Legal Obligation
Benefits provision (e.g. health insurance)	To administer employee benefits	Contract
Share plan participation	To manage share awards and compliance	Contract Legitimate Interests
Pension enrolment	To meet automatic enrolment duties	Legal Obligation
Liaising with pension/benefits providers	For benefit administration	Contract Legitimate Interests
Managing the contract	General contract management and HR operations	Contract Legitimate Interests
Business planning and auditing	Internal management and compliance	Legitimate Interests
Performance and appraisals	To assess and improve performance	Contract Legitimate Interests
Salary and promotion decisions	To reward and retain employees	Contract Legitimate Interests
Disciplinary/grievance handling	To investigate and resolve issues	Contract Legitimate Interests
Ending employment	To manage exit process and obligations	Contract Legitimate Interests
Training and development	To support career growth and compliance	Contract Legitimate Interests
Legal disputes	To defend or bring legal claims	Legal Obligation Legitimate Interests
Fitness for work and health monitoring	To manage wellbeing and adjustments	Contract Legal Obligation
Sickness absence	To administer leave and benefits	Contract Legal Obligation
Health and safety compliance	To fulfil legal duties	Legal Obligation
Fraud prevention	To protect business assets and people	Legitimate Interests
Monitoring IT and communications	To ensure security and policy compliance	Legitimate Interests
Network and cybersecurity	To protect systems and data	Legitimate Interests
HR analytics (e.g. attrition)	To improve workforce planning	Legitimate Interests
Equal opportunities monitoring	To promote fairness and comply with the law	Public Interest Legal Obligation

We only use your data for the reasons collected unless we reasonably consider that there is a compatible alternative purpose.

Please note that we may use your personal information without telling you or asking for your permission if the law allows or requires us to do so.

Sensitive Personal Data

We may process special categories of personal data:

- With your explicit consent.
- To carry out legal obligations or rights related to employment.
- For public interest (e.g. equal opportunities).
- To protect life or prevent harm.

We have appropriate safeguards in place for processing this type of data.

The following table shows the types of sensitive personal data we may need to use and why.

Use of Information	Why it's used	Legal Bases
Health and safety in the workplace	To protect your physical and mental wellbeing	Contract Legitimate Obligation
Assess fitness to work	To determine if you can safely perform work	Legal Obligation Legitimate Interests
Provide workplace adjustments	To support disabilities and health needs	Contract Legal Obligation
Monitor and manage sickness absence	To track and manage absence due to illness	Contract Legal Obligation
Administer benefits (e.g. maternity pay)	To manage statutory and employee benefits	Contract Legal Obligation
Ill-health related share plan decisions	To determine entitlements under share plans	Contract
Ill-health pension decisions	To decide pension eligibility due to ill health	Contract
Protect from harm	To prevent physical, mental or emotional harm	Legal Obligation Legitimate Interests
Equal opportunity monitoring	To ensure non-discrimination and diversity	Legal Obligation
Trade union membership	To pay premiums and comply with employment law	Legal Obligation

Is consent required?

We will not usually require your consent to process your personal data, including your sensitive personal data if processing is lawful. Where consent is required, it is voluntary and can be withdrawn at any time by contacting us.

Our obligation to comply with the principles of data protection

We comply with data protection laws at all times. This means that your personal data must be:

1. Used lawfully, fairly and transparently.
2. Collected for valid, specific purposes and not used incompatibly.
3. Relevant and limited to those purposes.
4. Accurate and up to date.
5. Kept only as long as necessary.

6. Secure.

Your obligations in respect of personal data

It is important that the personal information we hold about you is accurate and up to date. You must let us know if anything changes during your time working with us.

Is automated decision-making used?

We do not currently use automated decision-making. If this changes, we will notify you and ensure that safeguards are in place.

Is your personal data shared with any third parties?

We will share your personal information with third parties when it is required by law, when it is necessary to manage our working relationship with you, or when we have another legally valid reason to do so.

We may share your information with:

- Group companies, payroll, pension providers, IT services and providers, and benefit administrators.
- Share plan and pension trustees, regulators and legal authorities.
- Potential buyers or reorganisations, subject to safeguards.

All third parties are required to protect your data and process it only on our instructions.

We may transfer your data outside the UK only with appropriate safeguards in place.

Security of your data

We take data security seriously and limit access to those with a business need. All parties must protect your data and follow our instructions. We have procedures for suspected breaches and will notify you if required.

How long is the data kept for?

We keep your data only as long as necessary for legal or operational reasons. When no longer needed, we securely destroy or anonymise it.

We decide how long to keep your personal data based on its type, sensitivity, risks of misuse, our processing purposes and legal requirements. Sometimes we anonymise data so that it can't be linked to you. At this point, it will no longer be personal data and we may use it without notice to you.

Your Rights

By law, you have rights over your personal information. The following sets out a brief description of your rights and the corresponding ICO webpage for further information.

- Right to be informed – you have the right to be informed about the collection and use of your personal data (ICO link: [Right to be informed | ICO](#))
- Right of Access - see what personal data we hold about you (ICO link: [Right of access | ICO](#))
- Right to Rectification - ask us to correct inaccurate or incomplete data (ICO link: [Right to rectification | ICO](#))

- Right to Erasure - request that we delete your data in certain circumstances (ICO link: [Right to erasure | ICO](#))
- Right to Object - object to how we use your data, particularly where we rely on legitimate interests or for direct marketing (ICO link: [Right to object | ICO](#))
- Right to Restrict Processing - ask us to stop or limit how we use your data in certain situations (ICO link: [Right to restrict processing | ICO](#))
- Right to Data Portability - request your data in a format that can be transferred to another organisation (ICO link: [Right to data portability | ICO](#))

Exercising Your Rights

You can access your personal information and exercise your rights free of charge.

However, if a request is clearly unfounded or excessive, we may charge a reasonable fee or refuse to act on it.

We may ask you for proof of identity before responding, to make sure that your information is only shared with you. This is a security measure to protect your privacy.

Contact Details

For questions or concerns, please contact us at enquiries@patientfirstcomplaints.co.uk. You may also contact the Information Commissioner's Office if you believe that your rights have been breached.