

OWNER
HR DIRECTOR**APPLICABILITY**
ALL UK AND EU SITES FOR **DE SOUTTER MEDICAL,**
ZETHON, AND BUSHLAND MEADOWS

1 Purpose

De Soutter Medical is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. You are being sent a copy of this privacy notice because you are applying for work with, or are already employed by, De Soutter Medical (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used, how and why it may be shared, and how long it will usually be retained for. It provides you with certain information that must be provided under the UK Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

We may amend this Notice from time to time and will inform you in advance of the effective date of any material changes that we intend to implement.

2 Identity of the Data Controller

De Soutter Medical is responsible for processing your personal data and is the data controller. Our main address is Halton Brook Business Park, Weston Road, Aston Clinton, Aylesbury, HP22 5WF.

De Soutter Medical is the parent company and is accountable for all processing by subsidiaries, namely, Zethon Limited, and Bushland Meadows.

3 How is your personal information sourced?

Most of the personal data that we process about you has been provided by you directly to us. We may also collect personal data about applicants from other third parties including:

- former employers;
- education establishments from which you have received qualifications;
- background check providers and criminal records check providers including the Disclosure and Barring Services, where required or permitted by law;
- professional bodies (where necessary to confirm membership/accreditation);
- law enforcement agencies, government agencies, regulators or any other person having appropriate legal authority;
- your named referees;
- recruitment agencies; and
- credit reference agencies.

4 Information we hold about you

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you as set out in the table below. This also identifies our lawful basis for the specified purposes and conditions for any special category data.

Categories of Personal Data	Purpose of Processing	Lawful Basis	Special Condition*
Name, address and previous addresses,	To communicate with you in relation to your	Legitimate Interests	Not applicable

personal telephone number, and email address	application with us and to maintain identifiable records of our recruitment process; and to maintain HR records.		
National Insurance ID number	To administer your salary, expenses, taxes and financial benefits	Legal obligation	Not applicable
Copy of your passport	To verify your eligibility to work for us	Legal obligation	Not applicable
Date of birth	To monitor recruitment / equality statistics	Legitimate interest	Not applicable
Gender	To monitor recruitment / equality statistics	Legitimate interest	Not applicable
Details of work permit	To assess your suitability for a role with us	Legal obligation	Not applicable
Immigration and Nationality	To meet regulatory requirements	Legal obligation(s): Right to Work Compliance with other <i>legislation which De Soutter Medical are subject to.</i>	Processing is necessary for the purposes of performing or exercising obligations or rights imposed or conferred by employment, social security or social protection laws (Schedule 1, Part 1, paragraph 1 of the DPA).
Education history	To assess your skills, qualifications, and suitability for a role with us.	Legitimate interest; Contractual Obligation	Not applicable
Qualifications			
Professional registration details			
CV			
Previous experience			
Work history			
References			
Actual or alleged criminal offences			
Health data related to injuries or sickness or that otherwise impact your ability to perform your job	For medical-related matters e.g. making reasonable adjustments	Contract - Necessary for the performance of your planned employment agreement with us.	Processing is necessary for health or social care purposes, e.g., the assessment of the working capacity of an employee (Schedule 1, Part 1, paragraph 2 of the DPA).
Disability*	To monitor equality of opportunities and diversity within our recruitment process.	Legitimate interest; Legal Obligation	Processing is necessary for the purposes of identifying or keeping under review the existence or absence of equality of opportunity or
Physical or mental health*			
Religious or philosophical beliefs*			
Race/ethnicity*			

Sexual orientation*	To identify any necessary adjustments that would be required should we proceed to offer stage.		treatment between groups of people with a view to enabling such equality to be promoted or maintained (Schedule 1, Part 2, paragraph 8 of the DPA). ** Processing is necessary for purposes of promoting or maintaining diversity in the racial and ethnic origins of individuals who hold senior positions (Schedule 1, Part 2, paragraph 9 of the DPA).
*n.b. Candidates and Employees are under no obligation to provide this data.			
CCTV images	To ensure the safety and security of you, our staff, and our premises	Legitimate interest	Not applicable

N.B. We may need to process data as necessary in connection with any legal claims or prospective legal claims. (Schedule 1, Part 3, paragraph 33 of DPA.)

** The categories of personal data listed (sexual orientation, health data, religion or racial or ethnic origin) shall not be used for the purposes of measures or decisions in relation to your employment. Please note that you are under no obligation to provide these categories of your personal data for the purpose identified.

4.1 If you fail to provide personal information

If you do not provide the necessary information when requested, such as evidence of qualifications or work history necessary for us to evaluate your application, we will not be able to proceed with your application successfully. For instance, if we need to check references for the role you are applying for and you fail to provide us with relevant details, we will not be able to move forward with your application.

Additionally, there may be times when we require more information from you for De Soutter Medical for us to meet our responsibilities as an employer; to ensure accurate records, evaluate your ability to work, make suitable adjustments, guarantee health and safety, manage our workforce. By withholding the necessary information may impede our effectiveness as an employer.

5 Automated decision-making

During recruitment, we may set certain criteria necessary for a role; for example, qualifications or number of years' experience. These requirements will be explicit within the job ad, and the platform will filter out those who do not meet these criteria.

Aside from this solo example, there are no other instances where you would be subject to decisions that have a significant impact on you based solely on automated decision-making.

6 Data sharing: intra-group and third-party recipients

Why might you share my personal information with third parties?

De Soutter Medical also shares personal data with trusted service providers and business partners pursuant to contractual agreements with them. These agreements will, as necessary, include appropriate safeguards to protect any personal data that we share with them. We may share employee personal data

with third parties that perform services and carry out functions on our behalf and under our instruction as a data processor. These third parties include:

- Recruitment Agencies;
- IT service providers;
- HR information system providers; and
- Cloud storage service providers.

We may also disclose applicant personal data to third parties acting as independent data controllers. All of these recipients are themselves responsible for determining the purposes and means of the processing and for the lawfulness of the processing. These third parties include:

- Life insurance providers;
- Health insurance providers;
- Workplace pension;
- Occupational Health;
- our auditors, lawyers, consultants, law enforcement and other public authorities (such as tax and social security bodies and healthcare organisations);
- the police, prosecutors, courts and tribunals;
- current or previous employers;
- educational establishments;
- third parties whose details you provide to us as references;
- background check providers and criminal records check providers including the Disclosure and Barring Services;
- credit or reference agencies.

7 Data Security

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

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

8 Data Retention

How long will you use my information for?

Candidates: We will retain your personal information for a period of twelve months after we have communicated to you our decision about whether to appoint the role. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way.

Staff: In line with the Chartered Institute of Personnel and Development (CIPD) guidelines for retention of employment records, we will retain your personal information for a period of 6 years from the end of employment.

After these periods, we will securely destroy your personal information in accordance with our data retention schedule.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

9 Rights of access, correction, erasure, and restriction

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact our Data Protection Officer in writing (see below for contact details)

10 Data Protection Officer

We have appointed a Data Protection Officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO via advice@dpocentre.com

You also have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues.

11 Document History

Version	Date	Amended By	Owner	Description of Change
1	2025-03	RM	DPO	Initial Draft