



## **POL020 Privacy Policy Statement**

The Data Protection Regulation 2018 and the new General Data Protection Regulation 2018 (GDPR), came into force on May 25<sup>th</sup>, 2018, with the aim of unifying and strengthening data protection for all EU citizens.

This Privacy Policy describes how UK Screening Solutions Limited collects, uses and discloses information, and what choices you have with respect to the information.

When we refer to “**UK Screening Solutions Limited**”, we mean the UK Screening Solutions Limited entity that acts as the controller or processor of your information, as explained in more detail in the “Identifying the Data Controller and Processor” section below.

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### **Applicability of This Privacy Policy**

This Privacy Policy applies to UK Screening Solutions Limited services and other interactions (e.g., customer service enquiries, etc.) you may have with UK Screening Solutions Limited (collectively “**Services**”). This Privacy Policy also applies to the UK Screening Solutions Limited website ([www.ukscreeningsolutions.com](http://www.ukscreeningsolutions.com)). If you do not agree with the terms, do not access or use the Services or website.

A separate agreement governs delivery, access and use of UK Screening Solutions Limited Services (the “**Customer Service Level Agreement**”), including the processing of any messages, files or other content submitted through services accounts (collectively, “**Customer Data**”). The organisation (e.g., your employer or another entity or person) that entered into the Customer Agreement (“**Customer**”) controls their services (“**Account**”) and any associated Customer Data.

### **Information We Collect and Receive**

**UK Screening Solutions Limited** may collect and receive Customer Data and other information and data (“**Other Information**”) in a variety of ways:

**Customer Data.** Customers or individuals granted access to an account by a Customer (“**Authorised Users**”) routinely submit Customer Data to UK Screening Solutions Limited when using the Services. This may include sensitive and confidential personal information.

**Other Information.** UK Screening Solutions Limited also collects, generates and/or receives Other Information such as:



- **Account Information.** To create or update an Account, you or your Customer (e.g., your employer) supply UK Screening Solutions Limited with an email address, phone number, password, domain and/or similar account details, delivery and contact information, Company registration details and details around the service provision required. For details on Account creation, in addition, Customers that purchase Services provide UK Screening Solutions Limited (or its payment processors) with billing details such as credit card information, banking information and/or a billing address.
- **Website Information.** Information about your use of our website including details of your visits such as pages viewed and the resources that you access. Such information includes traffic data, location data and other communication data. Information provided voluntarily by you. For example, when you register information or make a purchase
- **Cookie Information.** Cookies provide information regarding the computer used by a visitor. UK Screening Solutions Limited, may use cookies where appropriate to gather information about your computer in order to assist us in improving our website. We may gather information about your general internet use by using the cookie. Where used, these cookies are downloaded to your computer and stored on the computer's hard drive. Such information will not identify you personally. It is statistical data. This statistical data does not identify any personal details whatsoever.

You can adjust the settings on your computer to decline any cookies if you wish. This can easily be done by activating the reject cookies setting on your computer.

Our advertisers may also use cookies, over which we have no control. Such cookies (if used) would be downloaded once you click on advertisements on our website.

- **Additional Information Provided to UK Screening Solutions Limited.** We receive Other Information when submitted to our website or if you participate in a focus group, contest, activity or event, apply for a job, request support, interact with our social media accounts or otherwise communicate with UK Screening Solutions Limited.

Generally, no one is under a statutory or contractual obligation to provide any Customer Data or Other Information (collectively, "**Information**"). However, certain Information is collected automatically and, if some Information, such as Account setup details, is not provided, we may be unable to provide the Services.

### **How We Use Information**

Customer Data will be used by UK Screening Solutions Limited in accordance with Customer's instructions, including any applicable terms in the Customer Service Level Agreement, and as required by applicable law. UK Screening Solutions Limited is a processor of Customer Data and Customer is the controller.

UK Screening Solutions Limited uses Other Information in furtherance of our legitimate interests in operating our Services, Websites and business. More specifically, UK Screening Solutions Limited uses Other Information:

- **To provide, update, maintain and protect our Services, Websites and business.** This includes use of Other Information to support delivery of the Services under a Customer Agreement, prevent or address service errors, security or technical issues, analyse and monitor usage, trends and other activities or at an Authorised User's request.



**As required by applicable law, legal process or regulation.**

- **To communicate** with you by responding to your requests, comments and questions. If you contact us, we may use your Other Information to respond.
- **To send emails and other communications.** We may send you service, technical and other administrative emails, messages and other types of communications. We may also contact you to inform you about changes in our Services, our Services offerings, and important Services-related notices. These communications are considered part of the Services and you may not opt out of them. In addition, we sometimes send emails about new product features, promotional communications or other news about UK Screening Solutions Limited. These are marketing messages, so you can control whether you receive them.
- **For billing, account management and other administrative matters.** UK Screening Solutions Limited may need to contact you for invoicing, account management and similar reasons and we use account data to administer accounts and keep track of billing and payments.

If Information is aggregated or de-identified so it is no longer reasonably associated with an identified or identifiable natural person, UK Screening Solutions Limited may use it for any business purpose. To the extent Information is associated with an identified or identifiable natural person and is protected as personal data under applicable data protection law, it is referred to in this Privacy Policy as “**Personal Data.**”

**Lawful Basis**

UK Screening Solutions Limited control and process data based on the following:

Consent – Consent is required and requested for processing sensitive data and when sending out information for marketing purposes.

Contract – Other information is processed because it is necessary for fulfilling a contract or because specific steps need to be taken before entering into a contract.

**Data Retention**

UK Screening Solutions Limited will retain Customer Data in accordance with a Customer’s instructions, including any applicable terms in the Customer Agreement, and as required by applicable law.

UK Screening Solutions Limited may retain Medical or Drug and Alcohol screening Information pertaining to you for as long as necessary for the purposes described in this Privacy Policy. This may include keeping your Other Information after you have deactivated your account for the period of time needed for UK Screening Solutions Limited to pursue legitimate business interests, conduct audits, comply with (and demonstrate compliance with) legal obligations, resolve disputes and enforce our agreements.

Records are retained as specified by legal requirements, guidelines from the appropriate professional authorities or as defined in the service level agreement or contract.

Where no specific retention period is shown, the records are held for 6 years as live, after which they are archived on the server.

Paper records are disposed of by shredding to ensure that confidentiality is maintained.

## **How We Share and Disclose Information**

This section describes how UK Screening Solutions Limited may share and disclose Information. Customers determine their own policies and practices for the sharing and disclosure of Information, and UK Screening Solutions Limited does not control how they or any other third parties choose to share or disclose Information.

- **Customer's Instructions.** UK Screening Solutions Limited will solely share and disclose Customer Data in accordance with a Customer's instructions, including any applicable terms in the Customer Agreement, and in compliance with applicable law and legal process.
- **Third Party Service Providers and Partners.** We may engage third party companies or individuals as service providers or business partners to process Other Information and support our business. These suppliers and other third parties are not authorised by us to use your Personal Data in any other way than in the delivery of UK Screening Solutions Limited. products and services.
- **During a Change to UK Screening Solutions Limited Business.** If UK Screening Solutions Limited engages in a merger, acquisition, bankruptcy, dissolution, reorganisation, sale of some or all of UK Screening Solutions Limited assets or stock, financing, public offering of securities, acquisition of all or a portion of our business, a similar transaction or proceeding, or steps in contemplation of such activities (e.g. due diligence), some or all Other Information may be shared or transferred, subject to standard confidentiality arrangements.
- **Aggregated or De-identified Data.** We may disclose or use aggregated or de-identified Other Information for any purpose. For example, we may share aggregated or de-identified Other Information with prospects or partners for business or research purposes.
- **To Comply with Laws.** If we receive a request for information, we may disclose Other Information if we reasonably believe disclosure is in accordance with or required by any applicable law, regulation or legal process.
- **To enforce our rights,** prevent fraud, and for safety. To protect and defend the rights, property or safety of UK Screening Solutions Limited or third parties, including enforcing contracts or policies, or in connection with investigating and preventing fraud or security issues.
- **With Consent.** UK Screening Solutions Limited may share Other Information with third parties when we have consent to do so.

## **Security**

UK Screening Solutions Limited takes security of data very seriously. UK Screening Solutions Limited works hard to protect Other Information you provide from loss, misuse, and unauthorised access or disclosure.

These steps take into account the sensitivity of the Other Information we collect, process and store, and the current state of technology. Given the nature of communications and information processing technology, UK Screening Solutions Limited cannot guarantee that Information, during transmission through the Internet or while stored on our systems or otherwise in our care, will be absolutely safe from intrusion by others.

The Company does not accept responsibility for any loss arising from unauthorised access to, or interference with, any internet communications by any third-party, or from the transmission of any viruses.

## **Age Limitations**

To the extent prohibited by applicable law, UK Screening Solutions Limited does not allow use of our Services and Websites by anyone younger than 16 years old. If you learn that anyone younger than 16 has unlawfully provided us with personal data, please contact us and we will take steps to delete such information.

## **Changes to This Privacy Policy**

UK Screening Solutions Limited may change this Privacy Policy from time to time. Laws, regulations and industry standards evolve, which may make those changes necessary, or we may make changes to our business. We will post the changes to this page and encourage you to review our Privacy Policy to stay informed. If we make changes that materially alter your privacy rights, UK Screening Solutions Limited will provide additional notice, such as via email or through the Services. If you disagree with the changes to this Privacy Policy, you should deactivate your Services account. Contact the Customer if you wish to request the removal of Personal Data under their control.

## **Data Protection Officer**

UK Screening Solutions Limited have a designated appointed onsite Data Protection Officer that can be contacted regarding any data protection issues that may arise you can contact the Data Protection Officer by: Telephone on 01946 7 82000 or email [info@ukscreeningsolutions.com](mailto:info@ukscreeningsolutions.com).

## **Identifying the Data Controller and Processor**

Data protection law in certain jurisdictions differentiates between the “controller” and “processor” of information. In general, the Customer is the controller of Customer Data. In general, UK Screening Solutions Limited is the processor of Customer Data and the controller of Other Information.

## **You're Rights**

Individuals located in certain countries, including the European Economic Area, have certain statutory rights in relation to their personal data. Subject to any exemptions provided by law, you may have the right to request access to Information, as well as to seek to update, delete, withdraw consent or correct this Information.

- To request a copy of any personal information held about you, email precise details of the request [info@ukscreeningsolutions.com](mailto:info@ukscreeningsolutions.com) or write to UK Screening Solutions Limited 89 Main Street Egremont Cumbria CA22 2DJ There will be a charge of £10 for this service.
- To update, delete, withdraw consent or correct your personal information, email precise details of the request to [info@ukscreeningsolutions.com](mailto:info@ukscreeningsolutions.com) or write to UK Screening Solutions Limited 89 Main Street Egremont Cumbria CA22 2DJ
- To the extent that UK Screening Solutions Limited processing of your Personal Data is subject to the General Data Protection Regulation 2018 and General Data Protection Regulations 2018 (GDPR), UK Screening Solutions Limited relies on its legitimate interests, described above, to process your data.
- UK Screening Solutions Limited may also process Other Information that constitutes your Personal Data for direct marketing purposes and you have a right to object to UK Screening Solutions Limited use of your Personal Data for this purpose at any time. To do this email [info@ukscreeningsolutions.com](mailto:info@ukscreeningsolutions.com) with the request.



## **Contacting UK Screening Solutions Limited**

Please also feel free to contact UK Screening Solutions Limited if you have any questions about this Privacy Policy or UK Screening Solutions Limited practices, or if you are seeking to exercise any of your statutory rights. You may contact us at [iinfo@ukscreeningsolutions.com](mailto:iinfo@ukscreeningsolutions.com) or write to below:

Head Office Address: UK Screening Solutions. 89 Main Street, Egremont, Cumbria, CA22 2DJ

## **Contacting the ICO**

If you believe that data held controlling or managing by UK Screening Solutions Limited is not correctly processed you have the right to complain to the Information Commissioner's Office: You can find guidance on your obligations under information rights legislation on the ICO's website ([www.ico.org.uk](http://www.ico.org.uk)) as well as information on their regulatory powers and the action they can take. Or you can telephone or write to Information Commissioner's Office:

### **England**

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Tel: 0303 123 1113

### **Wales**

Information Commissioner's Office  
2nd floor  
Churchill House  
Churchill way  
Cardiff  
CF10 2HH  
Tel: 016 2554 5297  
Email: [wales@ico.org.uk](mailto:wales@ico.org.uk)

### **Scotland**

Information Commissioner's Office  
45 Melville Street  
Edinburgh  
EH3 7HL

Tel: 0303 123 111  
Email: [scotland@ico.org.uk](mailto:scotland@ico.org.uk)

### **Northern Ireland**

Information Commissioner's Office  
3rd Floor  
14 Cromac Place  
Belfast  
BT7 2JB

Tel: 028 9027 8757 1114  
Email: [ni@ico.org.uk](mailto:ni@ico.org.uk)

## **Liam Magennis**

Managing Director

Reviewed on the 01<sup>st</sup> January 2019