



Company Name:	Keystream Healthcare Resources Ltd ('the Company')
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The Company is a recruitment business which provides work-finding services to its clients and work-seekers. The Company must process personal data (including sensitive personal data) so that it can provide these services – in doing so, the Company acts as a data controller.

You may give your personal details to the Company directly, such as on an application or registration form or via our website, or we may collect them from another source such as a jobs board. The Company must have a legal basis for processing your personal data. For the purposes of providing you with work-finding services and/or information relating to roles relevant to you we will only use your personal data in accordance with the terms of the following statement.

1. Collection and use of personal data

a. Purpose of processing and legal basis

The Company will collect your personal data (which may include sensitive personal data) and will process your personal data for the purposes of providing you with work-finding services. This includes for example, contacting you about job opportunities, assessing your suitability for those opportunities, updating our databases, putting you forward for job opportunities, arranging payments to you and developing and managing our services and relationship with you and our clients.

Where we collect your information through publicly available sources, where you have yourself already published this information, we may use the (job boards) publishers own search software to do this. Such search tools use the publishers own parameters to express the requirements of the role and then to search the publicly available source to identify candidates who match the selected requirements. The publishers search tools only output skills, location, role and salary expectations. In registering and publishing their own personal data on public sites, candidates are expressing a reasonable expectation that their information may be collected further and processed by job recruiters for the purposes of identifying and assisting candidates to gain employment. In some cases, we may be required to use your data for the purpose of investigating, reporting and detecting crime and also to comply with laws that apply to us. We may also use your information during the course of internal audits to demonstrate our compliance with certain industry standards.

The legal bases we rely upon to offer these services to you are:

- Where we have a legitimate interest
- To comply with a legal obligation that we have
- To fulfil a contractual obligation that we have with you

If you are interviewed and submitted as a candidate, then this may involve the processing of more personal data including sensitive data such as health information that you or others provide about you. In this case we always ask for consent before undertaking such processing.

b. Legitimate interest

This is where the Company has a legitimate reason to process your data provided it is reasonable and does not go against what you would reasonably expect from us. Where the Company has relied on a legitimate interest to process your personal data our legitimate interests is/are as follows:

- For the Company to provide work-finding services.
- For the Company to process/transfer personal data with their clients in order to provide work-finding services.
- For any legal obligations we must adhere to

c. Recipient/s of data

The Company will process your personal data and/or sensitive personal data with the following recipients:

- Candidates and clients
- External verifiers such as DBS, Occupational Medicals
- Any regulatory authority or statutory body following an official request for information or legal obligation such as HMRC or the Crown Commercial Service
- Third Parties that process data on our behalf such as our CRM Provider, our Timesheet Portal system or other professional advisors

d. Statutory/contractual requirement

Your personal data is required by law and/or a contractual requirement (e.g. our client may require this personal data), and/or a requirement necessary to enter into a contract. You are obliged to provide the personal data and if you do not the consequences of failure to provide the data are:

- If you do not provide the personal data necessary, or withdraw your consent for the processing of your personal data, we may not be able to match you with available job opportunities or engage in employment activity on your behalf

2. Overseas Transfers

The Company will not transfer the information you provide to us to countries outside the European Economic Area ('EEA') for the purposes of providing you with work-finding services. The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein.

3. Data retention

The Company will retain your personal data only for as long as is necessary for the purpose we collect it. Different laws may also require us to keep different data for different periods of time.

The Conduct of Employment Agencies and Employment Businesses Regulations 2003, require us to keep work-seeker records for at least one year from (a) the date of their creation or (b) after the date on which we last provide you with work-finding services.

We must also keep your payroll records, holiday pay, sick pay and pensions auto-enrolment records for as long as is legally required by HMRC and associated national minimum wage, social security and tax legislation.

Where the Company has obtained your consent to process your sensitive personal data we will do so in line with our retention policy. Upon expiry of that period the Company will seek further consent from you. Where consent is not granted the Company will cease to process your sensitive personal data.

Our data retention policy is as follows:

Personal data: 2 years from the last meaningful contact with you
Sensitive data: 6 years from the end of the relevant tax year

4. Your rights

Please be aware that you have the following data protection rights:

- The right to be informed about the personal data the Company processes on you;
- The right of access to the personal data the Company processes on you;
- The right to rectification of your personal data;
- The right to erasure of your personal data in certain circumstances;
- The right to restrict processing of your personal data;
- The right to data portability in certain circumstances;
- The right to object to the processing of your personal data that was based on a public or legitimate interest;
- The right not to be subjected to automated decision making and profiling; and
- The right to withdraw consent at any time.

Where you have consented to the Company processing your personal data and/or sensitive personal data you have the right to withdraw that consent at any time by contacting our Data Protection Lead on gdpr@key-stream.com or call 0207 256 6111. There may be circumstances where the Company



will still need to process your data for legal or official reasons. We will inform you if this is the case. Where this is the case, we will restrict the data to only what is necessary for the purpose of meeting those specific reasons.

If you believe that any of your data that the Company processes is incorrect or incomplete, please contact us using the details above and we will take reasonable steps to check its accuracy and correct it where necessary.

You can also contact us using the above details if you want us to restrict the type or amount of data we process for you, access your personal data or exercise any of the other rights listed above.

5. Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it, please contact: our Data Protection Lead on gdpr@key-stream.com or 0207 256 6111

You also have the right to raise concerns with Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/concerns/>, or any other relevant supervisory authority should your personal data be processed outside of the UK, if you believe that your data protection rights have not been adhered to.