



## Privacy Policy

Wellwise Group takes information security very seriously to ensure privacy of the data we hold. We have put in place appropriate technical and organisational measures to ensure that our contractor's personal details (and other data we hold) are held securely and that personal details are used in accordance with the **General Data Protection Regulation (GDPR)**. Wellwise Group Client's and third party companies sharing personal data with us solely for business purposes are expected to act similarly. Under no circumstances should personal data be shared or divulged to other parties without the express approval of Wellwise Group. Any misuse of our confidential data will be reported to the Information Commissioners Office (ICO) accordingly. Our Privacy Policy was formerly known as our Data Protection Policy.

The Wellwise Group fully supports the eight legal requirements on the General Data Protection Regulation (GDPR) and ensures our internal quality systems comply with the requirements:

- Personal data shall be processed fairly and lawfully and in a transparent manner.
- Personal data shall be obtained for specific, explicit and legitimate purposes, and shall not be further processed in any manner incompatible with that purpose.
- Personal data shall be adequate, relevant and limited to what is necessary to the purpose for which they are processed.
- Personal data shall be accurate and, where necessary, kept up to date.
- Personal data processed for any purpose shall not be kept for longer than is necessary and each employee or contractor will have the right to ask for their data to be deleted from our records if they wish to stop working for us.
- Appropriate technical and organizational measures shall be taken to process data in an appropriate manner to maintain security, to protect data we control and implement policies and supporting documents to outline and communicate this. We will notify any data breach to the regulator (ICO) within 72 hours.

### Scope

This policy is applicable to all Wellwise Group Employees, temporary employees, Contractors, Clients and third party agents.

### Information we may collect from you

We will collect and store Contractor information provided to us when undergoing our registration process:

- Personal Details (ie name and title; gender, date of birth)



- Contact Details (ie email address, mailing address and telephone numbers)
- Biographical Data from Job Applications and CV's (ie employment history, training certification, medical certification, and any other information you provide)
- Client related data (ie timesheets and appraisal information)
- Bank Account and transaction Details for payment purposes only
- Technical Data (ie IP address, log in data)
- Profile Data (ie username and password and feedback and survey responses)
- Image Data via CCTV (only if you attend our premises)

We do not knowingly collect "special category" personal data such as your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation, and genetic data and/or biometric data. We also do not collect information about criminal convictions or offences.

### How do we use your personal data?

Personal Data will be processed fairly and lawfully, and will be obtained and processed solely for the administrative purposes and contractual necessity of the Company. Every effort will be made to keep personal data accurate and up to date and it is your responsibility to ensure that you inform us of any change of address, next of kin or any changes such as bank account in order that your personnel file and pay details may be kept up to date.

- To enable us to carry out our services
- To identify you
- To respond to your enquiries
- To allow you to register with our company and collect your certification
- To contact third parties to verify your qualifications, training and medical certification
- To carry out billing and payments and administration activities
- To evaluate your Curriculum Vitae and take any next steps to evaluate your suitability for roles where you have asked to be considered for future work opportunities

Personal data will not be kept longer than is necessary, although legal retention of data will need to be adhered to. If at any point during your association with the Company, we need to ask your Doctor/Consultant for a medical report, we will obtain your consent under the Access to Medical Reports Act. Third Party access to information concerning you, in relation to your work, will only be provided if you have provided written authorisation.

Wellwise Group has conducted a Risk Assessment to demonstrate we are complying with the General Data Protection Regulations (GDPR). This means we have properly considered the lawful basis upon which we collect personal data.

### Right of Access to Personnel Files

Contractors and Employees have a right to access their personnel file upon reasonable notice to the Company.

Contractors are encouraged to access their Contractor Personnel Information Record (via our website [www.wellwisegroup.com](http://www.wellwisegroup.com) using their unique log in details) to ensure that the information contained within it is accurate. Please notify us immediately if the information in your personnel information record is not accurate.



You also have the right to withdraw your consent for us to use your personal data if you no longer wish to be contacted. Should this be the case you can contact Wellwise Group by email at any time to begin this process. We will delete your data within 30 days of written request.

### Contractor Competency Scheme

To administer the Wellwise Group Competency Scheme we will need to pass some of your personal details to the Scottish Qualifications Authority (SQA) to register you for the qualification, such as, name; address; Date of Birth; and Scottish Candidate Number (if applicable). Personal Data collected in this respect will be adequate, relevant and limited only to that which is necessary for the Company's Competency Scheme administration. The SQA's Privacy Statement can be viewed at <https://www.sqa.org.uk/sqa/45397.html>.

### Wellwise Group Website

Wellwise Group display Contractor career and safety certification details on our website for registered clients to view. This information is often useful to clients making personnel choices and is password protected against unauthorised access. Contractors should ensure they keep their training and medical records, etc., as up to date as possible as it can directly impact on personnel selections made by clients.

We may use your IP address to assist us in administering our website. Your IP address is not linked to any data that could be used to identify you personally.

For information regarding the use of cookies on our website please refer to our cookie policy at <http://www.wellwisegroup.com/cookie-policy>.

### Linking to other Websites

Our website may contain links to other sites or resources that are provided solely for your convenience. Wellwise Group is not responsible for the availability of external sites or resources linked to our website, and does not endorse and is not responsible or liable for any content, advertising, products or other materials on or available from such sites or resources. Transactions that occur between you and any third party are strictly between you and the third party and are not the responsibility of Wellwise Group. None of the personal information described above is passed to any of these sites.

This Privacy Policy applies only to Wellwise Group and its website. We are not responsible for the privacy practices within any other websites, and you are therefore advised to review the terms and conditions and privacy policies of these linked sites, as their policies may differ from ours.

### How do we keep your personal data secure?

Wellwise Group has security measures in place designed to prevent data loss, to preserve data integrity, and to regulate access to the data. Only authorized Wellwise Group employees and third parties processing data on our behalf have access to your personal data.



All Wellwise Group employees who have access to your personal data are required to adhere to this Privacy Policy to ensure your personal data is processed only as instructed by Wellwise Group.

The security measures we have in place include:

- Regular reviews of information collection, storage and processing practices to protect against unauthorized access
- Use of secure technologies (e.g. SSL Certificates and encryption of remote access data)
- Password protection to our website private area (you are responsible for keeping this password confidential and we ask you not to share your password with anyone).
- Regular backup to encrypted secure storage
- All Company Mobile telephones have fingerprint access technology

## Data Breaches

All Data Breaches will be investigated and an incident report recorded (RIR). Relevant Data Breaches will be reported to the ICO (Information Commissioners Office) the UK Regulator for information rights. Measures will be put in place to correct the root cause of the breach.

## General

In conjunction with this policy Contractors and Employees will be asked ***to sign and return the Privacy Statement Declaration – Appendix A of this Policy to confirm that they have read and understood this policy.***

We change/update this Privacy Policy from time to time. You should check this notice on our website occasionally, in order to ensure you are aware of the most recent version.

Should you require any further information regarding this policy please contact our QHSE department (qhse@wellwisegroup.com).

## Related Documents

F001	Risk Identification Report (RIR)
WWG P066	Control of Records Procedure
WWG P030	Document Control Procedure



## APPENDIX A

# Privacy Policy Declaration

Please sign and return a copy of this Privacy Policy Declaration for our records to confirm you have read and understood the above Privacy Policy, and to accept the following reasons for collection, uses and sharing of your Personal Data with third parties.

***Please be assured your Personal Data will be processed fairly and lawfully, and will be obtained and processed solely for the administrative purposes and contractual necessity of Wellwise Group.***

- To share your Personal Information Record (PIR), Curriculum Vitae, relevant training and medical certification with our Clients for the purposes of finding you work and proving your competence.
- To contact relevant third parties to verify your qualifications, training and medical certification
- To use for travel visa applications and travel bookings
- To carry out billing and payments and administration activities

***I am a Contractor of the Wellwise Group and I am happy for the above information to be shared with authorised third parties for the purposes of obtaining work for me.***

Signed .....

Print Name .....

Dated .....

(Please sign and return to [admin@wellwisegroup.com](mailto:admin@wellwisegroup.com))

***We will use this declaration to prove to third parties that you have given your consent to sharing your personal data as above.***

If you have any queries relating to this Policy or this Declaration, please contact the Wellwise Group QHSE Advisor as soon as possible after receipt. A copy of our Privacy Policy can also be found on our website [www.wellwisegroup.com](http://www.wellwisegroup.com) (See the link on the footer of the Home Page).