

1 General

Clinical Professionals Limited ('Clinical Professionals') is committed to protecting all personal, special, and criminal categories of data held on you.

Clinical Professionals is part of the Cpl Group of companies and for data protection purposes, is the controller and responsible for your personal data.

The Clinical Professionals Group includes the following brands and companies:

- Clinical Professionals Limited
- Only Medics
- Regulatory Professionals
- Scientific Professionals
- MedComms Professionals
- Cpl Professionals Inc, doing business as Cpl Physicians
- Graduate Academy

As such, Clinical Professionals wants you, the 'data subject', to understand how Clinical Professionals collect, use, store, and share your personal data. Clinical Professionals also wants you understand what rights you can invoke to help you to protect your privacy. In this regard, it is important that you read this Privacy Notice and understand how Clinical Professionals uses your personal data. Please note that Clinical Professionals reserves the right to update this Privacy Notice as required. The most recent version of this document can be found on Clinical Professionals' website through the following link: <https://www.clinicalprofessionals.co.uk/privacy-policy/>

1.1 Clinical Professionals Information

Clinical Professionals is an International pharmaceutical research and development recruitment company, with a focus on job placement in the scientific, pharmacology, clinical development and post approval services. Clinical Professionals provides recruitment services and matches people with the right jobs every day.

Clinical Professionals is committed to protecting the rights and privacy of individuals in accordance with both European Union and United Kingdom data protection legislation. Clinical Professionals shall lawfully and fairly process

personal data about candidates, employees, clients, and other stakeholders to achieve its mission and functions.

If you wish to locate further information on Clinical Professionals, you can find this on the Clinical Professionals website through the following link: <https://www.clinicalprofessionals.co.uk/>

1.2 Legislation

All personal data processed by Clinical Professionals is done so in accordance with the Data Protection Act 2018.

1.3 Queries and Complaints

If you are unhappy with the way Clinical Professionals handles your personal data and wish to complain, or if you simply want further information about the way your personal data will be used, please contact Clinical Professionals at the below:

Data Protection Officer

Clinical Professionals Limited

33 Blagrove St,

Reading RG1 1PW,

United Kingdom

Telephone: +44 118 959 4990

Email: dataprivacy@cpl.com

You have the right to lodge a complaint with the Data Protection Commission. To contact the Data Protection Commission, please use the following details:

Data Protection Commission

21 Fitzwilliam Square South

Dublin 2

D02 RD28

Ireland

Telephone: +353 (0)761 104 800

Telephone: +353 (0)57 868 4800

Email: info@dataprotection.ie

1.4 Breaches

Clinical Professionals will take all appropriate technical and organisational steps to safeguard your personal data. In the unlikely event of a data breach, Clinical Professionals will contact you in line with Clinical Professionals' legal obligations.

2 How Does Clinical Professionals Collect Information?

Clinical Professionals collects personal data to enable the provision of services to support the Clinical Professionals purpose. The following non-exhaustive methods of data collection are an indication of ways in which Clinical Professionals may obtain your information:

- Obtain personal data directly from you;
- Personal data that Clinical Professionals receives from other sources; It is important that the personal data you provide Clinical Professionals is up to date and accurate. As outlined in Section 7.4 of this notice, if personal data Clinical Professionals hold on you is inaccurate or incomplete, please contact Clinical Professionals to update the information.

3 What Does Clinical Professionals Use Information For?

3.1 Process, Purpose, and Lawful Basis

Clinical Professionals uses personal data collected to fulfil Clinical Professionals' obligations to provide recruitment services and to enable the provision of services to support the Clinical Professionals purpose.

Clinical Professionals uses personal data for any of the following purposes:

Process	Purpose	Lawful Basis
Pre-Recruitment	To register a prospective data subject's interest in recruitment for employment.	<p>Processing is necessary in order to take steps at the request of the data subject prior to entering into a contract.</p> <p>The processing is necessary for the exercise of rights and obligations under employment law.</p>
Recruitment and Selection	To complete the recruitment process and assess data subject suitability.	<p>Processing is necessary in order to take steps at the request of the data subject prior to entering into a contract.</p> <p>Processing relates to Clinical Professionals' obligations in employment and for assessing data subject's work capacity.</p>
Pension	To administer a data subject's pension entitlement and to comply with pension rules.	<p>To comply with various pension laws.</p> <p>Processing is necessary for the performance of a contract to which the data subject is party.</p>
Payroll	To enable Clinical Professionals to effect payment to the data subject.	Processing is necessary for the performance of a contract to which the data subject is party.
Personnel File	To comply with employment and revenue laws and to ensure that terms and conditions of employment are adhered to.	<p>Processing is necessary for the performance of a contract to which the data subject is party.</p> <p>To comply with various employment and revenue laws.</p> <p>To protect the vital interests of the data subject in the event of an accident or emergency.</p>
Entitlement to Work	To enable Clinical Professionals to achieve compliance with its obligations pursuant to any local legislation governing the entitlement to work.	Processing is necessary for compliance with a legal obligation to which Clinical Professionals is subject.
Time and Attendance Records	To enable the data subject to avail of their rights and entitlement pursuant to the Working Time Regulations 1998.	The processing is necessary for the performance of contract to which the data subject is party.

Statutory Entitlement	<p>To enable Clinical Professionals to achieve compliance with:</p> <ul style="list-style-type: none"> · Its obligation to the data subject; · Record keeping obligations pursuant to a variety of employment law statutes. 	<p>The processing is necessary for compliance with legal obligation to which Clinical Professionals is subject.</p>
Training Records	<p>To ensure that Clinical Professionals is in a position to assess the data subject's training needs and to capture proof of training.</p>	<p>The processing is necessary for the performance of contract to which the data subject is party.</p>
Performance Details	<p>To manage the data subject's performance in accordance with relevant Clinical Professionals policies.</p>	<p>The processing is necessary for the performance of contract to which the data subject is party.</p>
Grievance and Disciplinary	<p>To ensure the data subject's complaints are fairly investigated in accordance with Clinical Professionals policies.</p>	<p>To comply with Clinical Professionals legal obligation to apply fair procedures to any data subject's investigation.</p> <p>The processing is necessary for the performance of contract to which the data subject is party.</p>
Medical Information	<p>To manage the data subject's absences, to manage sick pay in accordance with the contract of employment, and to manage the fitness to work of data subjects.</p>	<p>Processing is necessary to assess, subject to data subject safeguards, the working capacity of the data subject.</p> <p>To carry out obligations and exercise rights under employment law.</p>
Making or Receiving Payments	<p>To make or receive any payments in the discharge of normal business functions, dispute settlement, or to carry out any other payment requirements.</p>	<p>Processing is necessary for compliance with various employment and revenue laws.</p> <p>The processing is necessary for the performance of contract to which the data subject is party.</p>

Voice of the Customer	To obtain the data subject's feedback by survey on the Clinical Professionals recruitment processes, client services and for research purposes.	Processing is based on request of consent which will be taken from the data subject.
Attracting Talent	To provide support and assistance on recruitment services to data subjects via third party sources, such as LinkedIn and other job sites, from which Clinical Professionals obtain personal data.	Processing is based on legitimate interest.
Supporting Talent	To support data subjects in their career guidance and communicate with them directly with useful information, advice, and support materials through email, messaging, or mobile/web notification.	Processing is based on legitimate interests and contractual obligations.
Regulatory Compliance	To comply with financial regulations and any other relevant laws and regulations.	Processing is necessary for compliance with a legal obligation to which Clinical Professionals is subject.
Third Party Data Sharing	To allow Clinical Professionals to conduct and carry out functions with third party service providers that enable Clinical Professionals to deliver Clinical Professionals' services.	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
Back-ups	To store personal data and make back-ups of that data in case of emergencies and for disaster recovery purposes.	Processing is necessary for compliance with a legal obligation to which the Clinical Professionals is subject.

Evidence Submissions	To gather information for dispute resolution services and legal proceedings.	Processing is necessary for compliance with a legal obligation to which the Clinical Professionals is subject.
Transfer of Information for Parties Legal Proceedings	To allow parties to commence legal proceedings.	Processing is necessary for compliance with a legal obligation to which the Clinical Professionals is subject.
CCTV systems	For the security, health, and safety of individuals on Clinical Professionals premises.	Processing is based on legitimate interest and is necessary for compliance with a legal obligation to which the Clinical Professionals is subject.
Accidents and Incidents	To enable Clinical Professionals to comply with record keeping obligation pursuant to the Health and Safety at Work Act 1974.	Processing is necessary for compliance with a legal obligation to which the Clinical Professionals is subject.

4 Who Does Clinical Professionals Share Information With?

Clinical Professionals may share personal data with other parties in the course of Clinical Professionals' duties. When this is done, Clinical Professionals adheres to the following principles:

- The transfer is based on a legal obligation, the performance of a contract, or explicit consent.
- Where data is transferred to another party, Clinical Professionals ensures appropriate technical and organisational safeguards are used to protect your personal data.
- Where Clinical Professionals engages a third party to provide a service to Clinical Professionals, Clinical Professionals ensures the provider has taken appropriate technical and organisational measures to process, store, and safeguard your personal data.

- Clinical Professionals, as a Data Controller, will not sell your data to any third party and will take all appropriate steps to ensure the security of your data in dealings with third parties.

While the parties Clinical Professionals engages may change occasionally, Clinical Professionals believes it is important you are aware of the types of parties Clinical Professionals shares data with. The categories and types of third parties outlined below is a non-exhaustive list but provides an indication of the parties Clinical Professionals shares data with.

4.1 Other Third Bodies

Third parties for the purposes of internal and external audits, carrying out research, general practitioners, and or third parties who may improve Clinical Professionals' processes and services (such as consultants).

4.2 Government Departments, Bodies or Agencies

Clinical Professionals is legally obligated to share personal data with state actors which is outlined in the Data Protection Act 2018.

Recipients of this data include Government departments such as HMRC, agencies, bodies, investigatory bodies, local authorities, and the UK Police.

4.3 International Transfers

Where personal data is transferred outside the European Economic Area, Clinical Professionals use safeguards known as Standard Contractual Clauses (SCCs).

5 What Type of Information is Collected?

To fulfil Clinical Professionals' mandate and perform tasks as outlined in this statement, Clinical Professionals needs to collect various types of personal data.

While the type of personal data may change occasionally, Clinical Professionals believes it is important you are aware of the types of data Clinical Professionals gathers and uses. The following table is a non-exhaustive list and provides an indication of the categories and types of data Clinical Professionals uses to perform Clinical Professionals' tasks.

Please note that information listed under one category may be used for the performance of a task or in relation to activities under another heading or as outlined under Section 3.

Category	Type of Data
Candidates	<p>Contact details, proof of address, CV, cover letter, qualifications, employment history, transcripts, degree certificate, training history, references, interview feedback and interview notes, driver's license, references</p> <p>Special data such as Criminal Declaration form, disability details, passport, nationality cards, ethnicity.</p>
Employees	<p>Contact details, pay details, bank details employment contract, annual leave details, return to work meeting notes, probation forms, performance review forms and notes and performance improvement plan documentation, expense claims, pension details, tax details, incident reports for health and safety, grievance & disciplinary documents such as statements and recordings</p> <p>Special data revealing data such as sick leave records, doctor notes and occupational health assessments</p>
Other Stakeholders	<p>Contact details, proof of address, company registration documents, bank details, invoices, tax details and bank statements.</p>

6 How Long Does Clinical Professionals Retain Information?

Clinical Professionals have developed a record retention schedule for all the personal data Clinical Professionals holds. Each retention period varies dependent on the nature and the purpose of the processing.

The main factors which determine retention periods are as follows:

1. How long it is required to perform the task;
2. Any legal requirements to hold onto the data;
3. Any pending legal actions.

If you would like to see a copy of the Retention Policy, please contact the DPO at dataprivacy@cpl.com

7 What Are Your Rights?

As a data subject, you will have the following rights as outlined in this section. **However, restrictions may apply in certain situations.**

7.1 Where do I send requests?

Please send all your requests to the contact details provided in Section 1, with as much detail as possible about your requirements to allow Clinical Professionals to deal with your request efficiently. To answer your request, Clinical Professionals may ask you to provide identification for verification purposes.

7.2 How long will a request take?

Upon receipt of a request, Clinical Professionals will have 30 days to provide an answer with an extension of two further months if required. If Clinical Professionals requires more time to deal with your request, Clinical Professionals will notify you of the delay and the reasons behind it within 30 days of the receipt of the request. If Clinical Professionals refuses your request, Clinical Professionals will also notify you within 30 days of the receipt of the request accompanied by the reasons for the refusal.

Clinical Professionals will not charge a fee for any requests, provided Clinical Professionals does not consider them to be unjustified or excessive. If Clinical Professionals does consider these to be unjustified or excessive, Clinical Professionals may charge a reasonable fee (also applicable for multiple copies) or refuse the request.

You are entitled to contact the Data Protection Commission if Clinical Professionals refuses your request.

7.3 Right of Access

You have a right to know what personal data Clinical Professionals holds on you, why Clinical Professionals holds the data, and how Clinical Professionals is processing your personal data.

When submitting your request, please provide Clinical Professionals with information to help verify your identity and as much detail as possible to help Clinical Professionals understand the information you wish to access (i.e. date range, subject of the request) and email dataprivacy@cpl.com

Please note that an access request is free of charge, however, where Clinical Professionals determines a request to be unjustified or excessive, Clinical Professionals may charge you a reasonable fee.

7.4 Right to Rectification

You have a right to request that Clinical Professionals' information held on you is up to date and accurate.

Where information is inaccurate or incomplete, Clinical Professionals encourages you to contact Clinical Professionals to have this information rectified. Upon receipt of request, Clinical Professionals will ensure that the personal data is rectified and as up to date as is reasonably possible.

7.5 Right to be Forgotten

You have the right to seek the erasure of your personal data in the following circumstances:

- The personal data is no longer required for the purposes for which it was obtained;

- Where data is being processed on the basis of consent, you withdraw consent to the processing and no other lawful basis exists;
- The personal data is being unlawfully processed;
- You object to the processing of personal data and there are no overriding legitimate grounds for the processing;
- Your personal data requires deletion in line with legal requirements.

However, Clinical Professionals will be unable to fulfil an erasure request if the processing of personal data is necessary for the following:

- Exercising the right of freedom of expression and information;
- Compliance with a legal obligation or for the performance of a task carried out in public interest;
- Reasons of public interest in the area of public health;
- Archiving or statistical purposes in the public interest;
- The establishment, exercise, or defence of legal claims;

Please note that where the legal basis for Clinical Professionals' processing of personal data is on the basis of a legal obligation, some processing in relation to your data may not be subject to the right to erasure.

To determine your request for erasure, Clinical Professionals will carry out an assessment of the justification for retaining your personal data where a legal requirement applies and contact you if Clinical Professionals are unable to fulfil your request.

Please be aware that in some circumstances Clinical Professionals may need to retain some information to ensure all of your preferences are properly respected. For example, Clinical Professionals cannot erase all information about you where you have also asked Clinical Professionals not to send you marketing material. Otherwise, Clinical Professionals would delete your preference not to receive marketing material.

7.6 Right to Restriction

You have the right to restrict the extent of personal data processed by Clinical Professionals in circumstances where:

- You believe the personal data is not accurate (restriction period will exist until Clinical Professionals updates your information);
- The processing of the personal data is unlawful, but you wish to restrict the processing of data rather than erase it;

- Where the personal data is no longer required by Clinical Professionals, but you require retention of the information for the establishment, exercise, or defence of a legal claim;
- You have a pending objection to the processing of the personal data;

When processing is restricted, your personal data will only be processed: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of other people; or for reasons important to public interest.

Clinical Professionals will contact you to confirm where the request for restriction is fulfilled and will only lift the restriction after Clinical Professionals have informed you that Clinical Professionals are doing so.

7.7 Right to Data Portability

You have the right to the provision of all personal data held in relation to you in a structured, commonly used and machine-readable format where:

- Processing is completed on the basis a contract;
- Processing is completed based on consent by the you;
- Processing is carried out by automated means.

You may also request that Clinical Professionals sends this personal data to another data controller where technically feasible.

7.8 Right to Object

You have the right to object to the processing of your personal data; however, the processing must have been undertaken on the basis of public interest or legitimate interest by Clinical Professionals.

If you wish to object to the processing of data, please contact Clinical Professionals with your request. Clinical Professionals will then stop the processing of personal data unless it is required for legal proceedings.