

Introduction

Factor 50 Ltd (“we”, “us”, or “our”) are dedicated to protecting personal data. We comply with the EU General Data Protection Regulation (GDPR). This Privacy Notice describes why and how we collect and use personal data and provides information about individuals’ rights. It applies to personal data provided to us by individuals themselves or by others. We may use personal data provided to us for any of the purposes described in this Privacy Notice or as otherwise stated at the point of collection.

Personal data means any information relating to an identified or identifiable natural (living) person. Factor 50 processes personal data for a number of reasons, and the means of collection, lawful basis of processing, use, disclosure and retention periods for each reason will differ.

Factor 50 Ltd are registered with the ICO (Registration number: ZA488135) and self-certify against the NHS Digital Data Security and Protection Toolkit (ODS: 8K896).

Who can you contact for privacy questions or concerns?

If you have questions or comments about this Privacy Notice or how we handle personal data, please contact **contact@factor-50.co.uk** or write to Factor 50, 4th Floor, Market Square House, St James St, Nottingham, NG1 6FG.

You may also contact the UK Information Commissioner’s Office at <https://ico.org.uk/concerns/> to report concerns you may have about our data handling process. Our ICO registration number is ZA488135.

Users of our website (www.factor-50.co.uk)

How do we collect personal data?

We obtain personal data from **users of our website** directly, from:

- Our ‘Contact Us’ form
- Email communications generated via our website

We may also obtain personal data from **users of our website** indirectly through cookies. More information can be found below in the section ‘Does our website use cookies?’.

What are the categories of personal data that we collect?

For **users of our website**, we may collect the following types of personal data:

- Contact information
- Anything shared as a message/email
- Data derived from cookies

We do not expect to collect special categories of personal data for **users of our website**.

What are the lawful bases we use for processing personal data?

We rely on consent for the processing of personal data for users of our website.

Why do we need personal data?

We will always endeavour to explain our rationale for collecting personal data and maintain transparency throughout. We collect personal data for **users of our website** to respond to contact requests and monitor website activity.

How long do we retain personal data?

Unless a different time frame applies as a result of business need or specific legal, regulatory or contractual obligations, we retain personal data for two years from the most recent engagement or processing.

We will dispose of personal data in a secure manner when we no longer require it.

Do we share personal data with third parties?

We will not share personal data for **users of our website** unless we have been given explicit consent or there is a legal or regulatory reason to do so. Please note, we may also use internally approved third party data processors to carry out business activities, e.g. technology providers, secure document disposal etc.

Job applicants and employees

How do we collect personal data?

We obtain personal data from **employees** directly, from:

- Job applications / CVs
- Direct requests

We may also obtain personal data about **employees** indirectly, for example from:

- Recruitment services
- Social media
- Internet searches
- News articles

What are the categories of personal data that we collect?

For **employees**, we may collect the following types of personal data:

- Financial information (e.g. bank details)
- Family and beneficiary details for insurance and pension planning services (e.g. names and dates of birth)
- Professional details (e.g. career history, education, professional memberships)
- Contact information

We may need to capture special categories of personal data for **employees**, for example:

- Dietary restrictions or access requirements when registering for in-person events that reveal religious beliefs and/or physical health information
- Personal identification documents that may reveal race or ethnic origin
- Personal data related to criminal convictions

What are the lawful bases we use for processing personal data?

We rely on contractual obligation for the processing of personal data for employees.

Why do we need personal data?

We will always endeavour to explain our rationale for collecting personal data and maintain transparency throughout. Personal details you provide in **your application for a job opening** at Factor 50 will be used by us to process your application in accordance with the GDPR and other applicable laws.

Once an individual has **taken up employment** with Factor 50, we will compile a file relating to their employment. The information contained in this will be kept secure and will only be used for purposes directly relevant to that person's employment. Once their **employment has ended**, we will retain the file in accordance with the requirements of our retention schedule and then delete or anonymise it.

How long do we retain personal data?

Unless a different time frame applies as a result of business need or specific legal, regulatory or contractual obligations, personal information about **unsuccessful candidates** will be held for 12 months after the recruitment exercise has been completed, it will then be destroyed or deleted. We retain de-personalised statistical information about applicants to help inform our recruitment activities, but no individuals are identifiable from that data.

Unless a different time frame applies as a result of business need or specific legal, regulatory or contractual obligations, we retain personal data for **current employees** until the contract of employment ends.

We will dispose of personal data in a secure manner when we no longer require it.

Do we share personal data with third parties?

We may share personal data for employees with third parties if it is required for the fulfilment of contractual obligations. For example, data processors providing payroll services, employment verification service providers etc.

Customers, suppliers and other business contacts

How do we collect personal data?

We obtain personal data from **customers, suppliers and other business contacts** directly, from:

- Business cards
- Direct requests
- Correspondence and communications
- Contracts

We may also obtain personal data from **customers, suppliers and other business contacts** indirectly, for example from:

- Bought-in marketing lists
- Public registers
- Framework agreements
- Internet searches
- Social media
- News articles

What are the categories of personal data that we collect?

For **customers, suppliers and other business contacts** we may collect the following types of personal data:

- Financial information (e.g. bank details)
- Professional details (e.g. career history, education, professional memberships)
- Contact information

We may need to capture special categories of personal data for **customers, suppliers and other business contacts**, for example:

- Dietary restrictions or access requirements when registering for in-person events that reveal religious beliefs and/or physical health information

What are the lawful bases we use for processing personal data?

We rely on contractual obligation where a contract is in place, otherwise we rely on consent for the processing of personal data for **customers, suppliers and other business contacts**.

Why do we need personal data?

We will always endeavour to explain our rationale for collecting personal data and maintain transparency throughout. We collect personal data for **customers, suppliers and other business contacts** to carry out our business activities.

How long do we retain personal data?

Unless a different time frame applies as a result of business need or specific legal, regulatory or contractual obligations, we retain personal data for two years from the most recent engagement or processing.

We will dispose of personal data in a secure manner when we no longer require it.

Do we share personal data with third parties?

We will not share personal data for users of our website unless we have been given explicit consent or there is a legal or regulatory reason to do so. Please note, we may also use internally approved third party data processors to carry out business activities, e.g. technology providers, secure document disposal etc.

F50 as a data processor

How do we collect personal data?

When fulfilling a role as a data processor, i.e. providing our professional services, we may obtain personal data indirectly from our customers who contract us to process data on their behalf.

We may also obtain data directly if contracted to do so by the data controller, for example connecting to a third-party API to retrieve linked data. In these cases we will still be acting as a data processor on behalf of the data controller.

What are the categories of personal data that we collect?

Factor 50 currently provides data processing services for NHS Trusts, this may include:

- Patient pseudonym (this is a unique identifier for an individual patient that is not immediately recognisable without other data, for example an NHS number)

We are likely to process special categories of personal data, including:

- Health information
- Ethnicity

What are the lawful bases we use for processing personal data?

As a data processor we are relying on contractual obligation for the processing of personal data. We also have policies and procedures in place to ensure there is a lawful basis for the type of processing we are contracted to provide. The lawful basis for processing is specified by the data controller.

Why do we need personal data?

Our services require personal data to facilitate direct patient care.

How long do we retain personal data?

Unless a different time frame applies as a result of business need or specific legal, regulatory or contractual obligations, we retain personal data for one year from receipt of the data.

We will dispose of personal data in a secure manner when we no longer require it.

Do we share personal data with third parties?

We will not share personal data in our capacity as a data processor unless we have been given explicit consent or there is a legal or regulatory reason to do so. Please note, we may also use internally approved third party data processors to carry out business activities, e.g. technology providers, secure document disposal etc.

What are your data protection rights?

Your data protection rights are defined by GDPR and are outlined below. Please note, that not all rights are universal, some rights are dependent on other factors such as the lawful basis for processing. To submit a request in relation to your data protection rights, please email **contact@factor-50.co.uk**.

The right of access to personal data

You have the right to access your personal data held by us.

The right of rectification

You have the right to request the correction of personal data held by us to the extent that it is inaccurate or incomplete.

The right to data portability

You have the right (in certain circumstances) to obtain personal data in a format to allow you to transfer it to another organisation.

The right to withdraw consent

You have the right to withdraw consent at any time, and the process to withdraw consent will be as easy as the process to give consent.

The right to object

You have the right to object to processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling).

This right also applies to direct marketing and processing for purposes of scientific/historical research and statistics.

The right to restrict processing

You have the right (in certain circumstances) to “block” or suppress the processing of your personal data.

The right to object to automated decision making (including profiling)

You have the right (in certain circumstances) to object to automated decisions (including profiling) based upon the processing of personal data and request human involvement.

The right to erasure/to be forgotten

You have the right (in certain circumstances) to request the deletion of personal data where there is no compelling reason for its continued processing.

We may request specific information from you to help us confirm your identity and therefore ensure your rights. This will help us guarantee that personal data is not disclosed to any person who has no right to receive it.

Personal data security

The measures we use to ensure personal data security for all of the personal information we process include:

1. Putting in place policies and procedures to protect personal data from loss, misuse, alteration or destruction.
2. Making sure that access to personal data is limited only to those who need access to it and that confidentiality is maintained.
3. Applying pseudonymisation and anonymisation techniques to further protect the data.
4. Collecting tracking information through our website in a way which endeavours to not identify anyone. We do not make any attempt to find out the identities of those visiting our website and will not associate any data gathered from our website with any personally identifying information from any source.
5. Annual internal information governance audits.

Please be aware that the transmission of data via the Internet is not always completely secure. Whilst we will do our utmost to protect the security of your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk.

Do we transfer personal data outside the European Economic Area (EEA)?

We endeavour to store personal data on servers located in the EEA. In the event that we store personal data outside the EEA, we will always ensure that appropriate safeguards are in place to guarantee individuals' rights remain enforceable.

Does our website use cookies?

This website uses cookies. We use cookies to help make our website usable and to understand how visitors interact with us.

Cookies are small text files that can be used by websites to make a user's experience more efficient.

The law states that we can store cookies on your device if they are strictly necessary for the operation of this site. For all other types of cookies we need your permission.

This site uses different types of cookies. Some cookies are placed by third party services that appear on our pages. The following types of cookies may appear on our site:

- *Necessary Cookies* - Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.
- *Preferences* - Preference cookies enable a website to remember information that changes the way the website behaves or looks, like your preferred language or the region that you are in.
- *Statistics* - Statistic cookies help website owners to understand how visitors interact with websites by collecting and reporting information anonymously.
- *Marketing* - Marketing cookies are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third party advertisers.

Where cookies are used, a statement will be sent to your internet browser explaining the use of cookies. You can change or withdraw your consent at any time by changing your browser settings.

Links to other websites

On our websites and their subdomains, we may provide links to other websites - known as external links. This Privacy Notice does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

External links are selected and reviewed when the page is published. However, we are not responsible for the content of external websites we have no control over. The content on external websites can be changed without our knowledge or agreement.

Some of our external links may be to websites which also offer commercial services, such as online purchases. The inclusion of a link to an external website from our website should not be understood to be an endorsement of that website or the site's owners, their products or services.

Changes to this Privacy Notice

We keep this Privacy Notice under regular review, including an annual review as part of our internal information governance audit schedule.

Modern Slavery and Human Trafficking

We would like to make a simple statement about modern slavery and human trafficking:

Modern Slavery is the term used within the UK and is defined within the [Modern Slavery Act 2015](#).

The Act categorises offences of Slavery, Servitude and Forced or Compulsory Labour and Human Trafficking.

Factor 50 Ltd continues to adopt a zero tolerance to modern slavery, human trafficking, all forms of servitude and forced and compulsory labour. We fully support the government's objectives to eradicate all forms of modern slavery and human trafficking and continue to set high standards of impartiality, integrity, transparency, and objectivity.

We will ensure that our activities and those of any sub-contractors operate to the highest level of ethical standards operating under sound governance arrangements.

Changes to this policy

We keep this policy under regular review, including an annual review as part of our audit schedule.