



Privacy Policy

for Empath Healthcare Recruitment

Empath Healthcare Recruitment treats the privacy of its employees and candidates very seriously and we take appropriate security measures to safeguard your privacy. This leaflet explains how we protect and manage any personal data* you share with us and that we hold about you, including how we collect, process, protect and share that data.

***Personal Data** means any information that may be used to identify an individual, including, but not limited to, a first and last name, a home address or other physical address and an email address or other contact information, whether at work or at home.

How we obtain your personal data

Information provided by you

You provide us with personal data when you send an application to us as a candidate or when you join us as an agency worker. This data is obtained via forms, email, or over the telephone. This includes name, address, date of birth, email address and bank account details. We use this information to manage and administer our contract with you, either as an employee or a candidate. We may also keep information contained in any correspondence you may have with us by post or by email. We currently do not record telephone conversations. We may obtain sensitive medical information directly from you in this process. The provision of this information is subject to you giving us express consent. If we do not have consent from you, then we are unable to service our agreement or contract with you. This means the legal basis for us holding your data is for the performance of a contract.

Information we get from other sources

We only obtain information from third parties if it is permitted by law. We may also use legal public sources to obtain information about you, for example, to verify your identity. This information, (including your name, address, email address, date of birth, etc.) as relevant to us, we will only obtain from reputable third-party companies that operate in accordance with the General Data Protection Regulation (GDPR). You will already have submitted your personal data to these companies and specifically given permission to allow them to pass this information to other companies as appropriate.

How we use your personal data

We use your personal data to manage and administer your contract with us. We also act as processor of your Direct Debit instructions where appropriate. We undertake at all times to protect your personal data, including any health and financial details, in a manner which is consistent our professional confidence and

the requirements of the General Data Protection Regulation (GDPR) concerning data protection. We will also take reasonable security measures to protect your personal data in storage.

Do we use your personal data for marketing purposes?

Any information you chose to give us will not be used for marketing purposes by us. We will hold your data only for the purposes of administering and managing your contract with us.

Sharing Information

We will keep information about you confidential and we will, from time to time, share your personal data within Empath Healthcare Recruitment of Companies, for example for the purposes of audit and compliance monitoring. We will only disclose your information with other third parties with your express consent with the exception of the following categories of third parties:

- Insurance companies, loss adjusters, regulatory authorities and other fraud prevention agencies for the purposes of fraud prevention and to comply with any legal and regulatory issues and disclosures;
- Any mailing or printing agents, contractors and advisors that provide a service to us or act as our agents on the understanding that they keep the information confidential;
- Any legal or crime prevention agencies and/or to satisfy any regulatory request if we have a duty to do so or if the law allows us to do so;
- The Revenue Commissioners, the Department of employment affairs and social protection, and other such Government bodies if we have a duty to do so or if the law allows us to do so;

Transfer of your personal data outside of the European Economic Area (EEA)

We do not currently transfer your personal data outside the EEA. If in the future we transfer your personal data, in accordance with the terms of our data Protection Policy, outside of the EEA, we will make sure that the receiver agrees to provide the same or similar protection as we do and that they only use your personal data in accordance with our instructions. If you require further information regarding such transfers, please write to: The Data Protection Officer, Empath Healthcare Recruitment, Rockford House, Deansgrange Road, Blackrock, Co. Dublin.

How long do we keep information about you?

We keep information in line with the retention policy of Empath Healthcare Recruitment. These retention periods are in line with the length of time we need to keep your personal information in order to manage and administer your contract with us. They also take into account the needs to meet any legal, statutory and regulatory obligation. These reasons can vary from one piece of information to the next. In all cases our need to sue your personal information will be reassess on a regular basis and information which is no longer required will be securely disposed of.

Data subject rights

Subject access requests

The general Data Protection Regulator (GDPR) grants you (hereafter referred to as the “data subject”) the right to access particular data that we hold about you. This is referred to as a subject access request. We shall promptly and certainly within one month from the point of receiving the request and all necessary

information for you. Our formal response shall include details of the personal data we hold about you, including the following:

- Sources from which we acquire the information
- The purpose for processing the information; and
- The personas or entitle with whom we are sharing the information.

Right to rectification

You, the data subject, shall have the right to obtain from us, without undue delay, the rectification if inaccurate personal data we are holding concerning you. Taking into account the purposes of the processing, you, the data subject, shall have the right to have incomplete personal data completed, including by means of providing supplementary statement.

Right to reassure

You, the data subject, shall have he right to obtain from us the ensure of personal data concerning you without undue delay

Right to restriction of processing

Subject to exemptions, you, the data subject, shall have the right to obtain from us restriction of processing where one of the following applied:

- a) The accuracy of the personal data is contested by you, the data subject, and is restricted until the accuracy of the data has been verified;
- b) The processing is unlawful and you, the data subject, oppose the erasure of the personal data and instead requests the restriction in its use;
- c) We no longer need the personal data for the purposes of processing, but it is required by you, the data subject, for the establishment, exercise or defence of legal claims;
- d) You, the data subject, have objected to processing of your personal data pending the verification of whether there is legitimate ground for us to override these objections.

Notification obligation regarding rectification or erasure of personal data or restriction of processing

We shall communicate any rectification or erasure of personal data or restriction of processing as described above to each recipient to whom the personal data has been disclosed, unless this proves impossible or involves disproportionate effort. We shall provide you, the data subject, with information about those recipients if you request it.

Right to data portability

You, the data subject, shall have the right to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit this data to another controller, without hinderance from us.



Right to Object

You, the data subject, shall have the right to object, on grounds relating to your particular situation at any time to the processing of personal data concerning you, including any personal profiling; unless this relates to processing that is necessary for the performance of a task carried out in the public interest or an exercise of official authority vested in us. We shall no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing which overrides the interest, rights, and freedoms of you, the data subject, or for the establishment, exercise or defence of legal claims.

Right to not be subject to decisions based solely on automated processing

We do not carry out any automated processing, which may lead to an automated decision based on your personal rights.

Invoking your rights

If you would like to involve any of the above data subject rights with us, please write to: The Data Protection Controller, Empath Healthcare Recruitment, Rockford House, Deansgrange Road, Blackrock, Co. Dublin.

Accuracy of information

In order to provide the highest level of service possible to you, we need to keep accurate personal data about you. We take reasonable steps to ensure the accuracy of any personal data or sensitive information we obtain. We ensure that the source of any personal data or sensitive information is clear, and we carefully consider any challenges to the accuracy of the information. We also consider when it is necessary to update the information, such as name or address changes and you can help us by informing us of these changes when they occur.

Important Information

Questions and queries

If you have any questions or queries which are not answered by this Policy or have any potential concerns about how we use the personal data we hold, please write to the Data Protection Officer, Empath Healthcare Recruitment, Rockford House, Deansgrange Road, Blackrock, Co. Dublin.

If you have a complaint

If you have a complaint regarding the use of your personal data or sensitive information then please contact us by writing to the Data Protection Officer, Empath Healthcare Recruitment, Rockford House, Deansgrange Road, Blackrock, Co. Dublin and we will do our best to help you.