**Central Health Solutions Privacy Policy**

1 Personal Information

1.1 We take your privacy seriously and this privacy policy (Privacy Policy) sets out how we will handle your personal data securely and in accordance with your rights.

1.2 Central Health Solutions Limited (we, us, our) is a registered data controller under the terms of the Data Protection Act 1998. Details of our notification to the data protection regulator may be found in the Information Commissioner’s Office Public Register of Data Controllers at [ico.org.uk](https://ico.org.uk) under registration number ZA265033. Our registered office address is at 1 Pegasus House, Pegasus Court, Tachbrook Park, Warwick, Warwickshire, CV34 6LW

1.3 Our Data Protection Officer is: Thomas Dalton.

2 General Information

2.1 This Privacy Policy explains what information we collect about you when you:

* (a) visit our website at
* )www.1centralhealth.co.uk
* (b) register as a commissioner,subscriber, member or sign up for a service with us,

and how we handle your information in respect of our agreement with you to provide membership, subscriber services, or commercial services (together, our Services) to ensure that we protect your rights.

2.2 Please read this Privacy Policy carefully to understand how we will treat your personal data. In this Privacy Policy, references to you or your shall mean you as a user of the Websites and/or our Services.

2.3 This Privacy Policy should be read together with the Websites terms of use policy in place from time to time (available at <https://www.1centralhealth.co.uk/governance> ) and our cookies policy (as set out in paragraph 9 of this Privacy Policy) (Cookies Policy) which together apply to your use of the Websites and our Services.

2.4 By using the Websites and/or our Services you will be regarded as having accepted the terms of this Privacy Policy. Please do not use the Websites or our Services if you do not agree to the terms of this Privacy Policy.

2.5 We recognise that in some circumstance (for example, if you are a member of a group with a general administrator for your information) you may authorise a third party to register Your Account on our Website and / or to apply for commissioned services or subscriptions on your behalf. In such cases, we will still require you to provide us with your consent to us processing your personal data in accordance with this Privacy Policy. We will contact you by email, attaching a link to a copy of this Privacy Policy and we will ask you to confirm by return email that you agree to our processing of your personal data in accordance with this Privacy Policy. Please note that we will not be able to register Your Account on our website any further until we have received your consent by email.

3 What information do we collect?

3.1 When you use the Websites and / or our Services we may ask you to provide certain information such as, your name, date of birth and contact details (including your address, email address, and contact telephone number).

3.2When you register Your Account with us on for contracts or services we may ask you for additional information with consent to share with commissioners or subcontractors. This information may include

* (a) details of your service delivery history, relevant experience and skills;
* (b) details of your contract,and training relevant to services.
* (c) occasionally suitable references from your employer or other third party referees.

3.3 We may also collect information on an ongoing basis about what pages you access or visit on the Websites and information about your use of the Website including, for example, services, registrations and locations you have viewed and any changes you make to information you supply to us, including by use of cookies (please see our Cookies Policy, set out in paragraph 9, below).

Sensitive personal information

3.4 In order to provide you with some of our Services we may also need to collect personal data which the Data Protection Act 1998 (DPA 1998) and the General Data Protection Regulation (GDPR) regards as sensitive or special categories of personal data, such as information relating to your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health or sexual orientation (Background Information) and/or information relating to any criminal convictions you have or offences you may have committed (Criminal Records Information) (Background Information and Criminal Records Information, together, being Sensitive Data).

4 What do we use your information for?

4.1 You have the right to be told the legal basis and purposes for the processing of your personal data. We are relying on your explicit consent to the processing of your personal data (including any Sensitive Data, as defined above). This means that if you exercise your right to withdraw your consent (please see paragraph 8 below) we will no longer be able to process your data . Please note we may retain a copy of your data in accordance with our data retention policy.

4.2 We may use your information for the following purposes:

* (a) to:
	+ (i) manage Your Account, process any information provided by you to us and to store your personal data in our databases;
	+ (ii) process any applications made by you for training , membership, or commissioned services advertised on the Website and manage the process, including contacting and liaising with commissioners in relation to your applications;
	+ (iii) assess your suitability for any commissioned services for which you have applied via our Website or for which we think you may be suitable;
	+ (iv) allow us to analyse your preferences and personalise our services to you; (v) as part of our due diligence process, to validate the information provided by you (and, in some cases, match it against information that has been collected by a third party, including background checks such as bankruptcy and insolvency registers, disqualified company director registers, Criminal Records Bureau / Disclosure and Barring Service checks and for proof of eligibility to work in the UK) and to check that the data we hold about our you is accurate, consistent and up to date;
	+ (vi) to communicate with you by email either directly or using web based mailshots (currently we use either Mailchimp or Wix Shout Outs) to keep you informed about information relating to our services and for potential services where you could get involved;
	+ (vii) discuss with our commissioners, local statutory representatives, and training organisations about your requirements for opportunities in which we think you may be interested or suitable, on the basis that such processing is necessary in order to perform our Services;
* (b) for our own market intelligence gathering purposes, to enable us to understand the market and prepare demographic, analytical, statistical or market information (which may include aggregating your data with, and benchmarking it against, data received from other individuals, contracts and employers) and to improve our services (all on the basis that your personal data will be completely anonymised and you will not be capable of being identified from such information if we share it externally);
* (c) to contact third parties such as your employer/referees whom you have nominated to verify information about yourself. By providing us with your employer/referee details when registering and/or when applying for opportunities advertised on the Website, you are deemed to have provided us with your consent to us contacting such employer/referees;
* (d) for such purposes as are reasonably necessary to comply with any legal obligations to which we are subject in the performance of our Services; and
* (e) to communicate with you, including sending you information which we think may be of interest to you and to send you event invites, newsletters and updates. You will be able to opt-out of such communications at any time by contacting us using the contact details in paragraph 12, below, or by opting-out of receiving information on our website

4.3 Please note that we may also use your personal data to prepare, use and disclose statistical and demographic information regarding use of the Websites for the purposes of improving the Websites (in pursuit of the legitimate interests of improving the Websites for the benefit of you and our other clients to whom we provide our Services) and for our marketing purposes (in no circumstances will you be capable of being identified from such statistical and demographic information).

4.4 We shall periodically check that the personal data we store for you is accurate. If you would like to update the personal data we hold about you, please contact us with your request using the contact details at paragraph 12, below.

4.5 In connection with any services for which you apply using our Website, we may ask you to complete an assessment to help us understand your suitability for such services.

5 Who do we share your information with?

5.1 As part of using our Services, you consent to us sharing your personal information with the following parties:

* (a) our data hosting/support service providers who process and store data on our behalf;
* (b) our directors and associated administrative staff using your data during the course of their duties;
* (c) third party data providers for the purposes of validating the information provided by you and to check that the data we hold about you is accurate, consistent and up to date (including for the purposes of performing background/verification checks of the type referred to in paragraph 4.2(a)(v) above);
* (d) your current employer and/or any other individuals who you nominate as referees to verify certain information;
* (e) any of our group companies, including any companies which may be added to our group from time to time;
* (f) any of our business partners and employers with whom we share information for the purposes of identifying suitable service providers, training opportunities or commercial opportunities in which we think you may be interested; and
* (g) our trusted third-party emailing service provider whom we use to upload and send email communications with you.

5.2 We may also share your personal information with third parties:

* (a) in the event that we or any of our group companies, our business, or substantially all of its assets are acquired by a third party (in which case personal information about customers will be one of the transferred assets);
* (b) if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply any contract with you or to protect our rights, property, or safety of our employees, customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction; or
* (c) if such disclosure is necessary in connection with any law (including any investigation or complaint regarding your use of the Website).

6 Transfers of personal data outside of the United Kingdom and the EEA

6.1 If you are registering for membership, applying for training or services on our Website and/or using our Services from:

* (a) within the United Kingdom and the European Economic Area (EEA), then we will not transfer your personal data outside of the United Kingdom and the EEA; or
* (b) outside of the United Kingdom and the EEA, then we may transfer your personal data outside of the United Kingdom and the EEA solely for the purposes of corresponding with you in relation to our Services.

6.2 We shall ensure that any such transfers outside of the United Kingdom and the EEA are lawful and with an adequate level of protection and that your personal is kept secure in accordance with the DPA 1998 (up to and including 24 May 2018) and the GDPR (from and including 25 May 2018).

7 How long do we store your personal data for?

7.1 We only store your personal information for as long as necessary for the purposes listed in paragraph 4.

8 What are your rights?

8.1 You may exercise your rights below by contacting us using the contact details in paragraph 12 of this Privacy Policy.

8.2 Access to your personal data: You may request access to a copy of your personal data by contacting us using the contact details in paragraph 12.

8.3 Right to withdraw: You may withdraw your consent to us processing your personal data at any time. Please contact us using the details located at paragraph 12 if you would like to withdraw your consent and we will delete your data in line with your right to erasure at paragraph 8.5 below. Please note that in the event that you wish to exercise your rights under this paragraph 8.3, we may be unable to process your application any further (including any in-flight applications) or continue to provide our Services to you.

8.4 Rectification: You may ask us to rectify inaccurate information held about you. If you would like to update the data we hold about you, please contact us using the details in paragraph 12.

8.5 Erasure: You may ask us to delete your personal data. If you would like us to delete the personal data we hold about you, please contact us using the contact details in paragraph 12 and specify why you would like us to delete your personal data.

8.6 Portability: You may ask us to provide you with the personal information that we hold about you in a structured, commonly used, machine readable form, or ask for us to send such personal data to another data controller by contacting us using the contact details in paragraph 12.

8.7 Right to object: You may object to our processing of your personal data pursuant to this Privacy Policy. Please contact us using the details in paragraph 12, providing details of your objection. Please note that in the event that you wish to exercise your rights under this paragraph 8.7, we may be unable to continue to provide our Services to you.

8.8 Make a complaint: You may make a complaint about our data processing activities to a supervisory authority, for the UK this is the Information Commissioner's Office, at [ico.org.uk](https://ico.org.uk).

9 Cookies Policy

Cookies

9.1 Certain parts of the Website use "Cookies" to keep track of your visit and to help you navigate between sections. What are Cookies?

9.2 A Cookie is a small data file that certain websites store on your computer's hard-drive when you visit such websites. Cookies can contain information such as your user ID and the pages you have visited.

What do we use Cookies for?

9.3 We use Cookies on the Website to enable us to deliver content that is specific to your interests, to give us an idea of which parts of the Website you are visiting and to recognise you when you return and to retain the information you provide as you navigate between pages on the Website whilst completing any searches for membership, training events, services or commercial offerings . Our Cookies do not directly read any other data from your computer's hard-drive or read Cookies created by other websites that you have visited.

How do I reject or accept Cookies?

9.4 You may refuse to accept Cookies by activating the setting on your browser which allows you to refuse the setting of Cookies. If, however, you select this setting you may be unable to complete an application for any job vacancies contained on our Websites as the information you provide will be lost as you navigate between pages on the Websites.

9.5 See <http://www.allaboutcookies.org> for more information about Cookies and how to disable them in your browser.

Third-party content

9.6 Please note providers of third party content contained on the Websites may also use Cookies over which we have no control.

10.0 Confidentiality

 10.1 We will treat all of your information in strict confidence and we will endeavour to take all reasonable steps to keep your personal data secure once it has been transferred to our systems. We adopt and ensure any third party suppliers providing services on our behalf adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorised access, alteration, disclosure or destruction of your personal information, and data stored on the Website and associated databases.

10.2 Please note that the internet is not a secure medium and we cannot guarantee the security of any data you disclose online. You accept the inherent security risks of providing information and dealing online over the internet and will not hold us liable for any breaches of your data protection rights attributable to the transmission of your personal data over the internet.

11.1 We may modify this Privacy Policy from time to time, so please review it regularly.

11.2 If we change this Privacy Policy we shall notify you by means of notice on our Main Website homepage and/or by notifying you through Your Account.

11.3 This Privacy Policy was last amended on 22nd May 2018.

12 Contact

12.1 If you have any queries relating to this Privacy Policy or our use of your personal data or you wish to exercise any of your rights under this Privacy Policy please contact:

* (a) our privacy team privacy@1centralhealth.co.uk (or such other email address as may be displayed on the "Contact Us" section of any of the Website from time to time); or

(b) our Data Protection Officer by post at Central Health Solutions Ltd at our correspondence address- Park View House. 114 Main Street, Dickens Heath, Shirley, Solihull, West Midlands. B90 1UA

10 Security and Data Storage

11 Changes to this Privacy Poli