

Data Protection Policy

UK Data Protection legislation seeks to safeguard an individual's rights in connection with the gathering, storing, processing and transferring of their personal data held by others.

One of the most obvious effects of this legislation relates to your employment with us, for example, where we hold and process a large amount of information on your behalf. We use this information for the purposes of administering your contract of employment, for tracking your career development with Synergy Medical and for internal reporting purposes. We also rely on processing information for other organisational purposes such as security access, for internal and external communication channels and for company business information.

Synergy Medical has a policy of open communication. You are entitled to view your own personnel files (both computerised and paper-based) at any time, subject to 24 hours notice. If any information held by Synergy Medical is found to be incorrect, we will amend or erase it as soon as possible.

The type of data that we hold:

As your employer we are entitled to hold and process personal data relating to your employment. This includes, for example, payroll data, pensions and tax related data, employee appraisals, performance records, employee entitlements such as commissions, bonuses, and private health insurance etc. Some of these items of data are held in manual form and others (e.g. payroll data) are held electronically. All of this is held in order that we can administer your employment contract efficiently and keep an accurate record of our employees.

To whom the data can be disclosed:

Information provided by an employee as part of their employment will not be disclosed to third parties without written permission. The exceptions to this are where the courts have ordered disclosure or the information has been requested as part of an official enquiry from organisations such as:

- The Department for Work and Pensions
- Revenue & Customs
- The Child Support Agency
- The Police

Additionally, part of Synergy Medical benefits package may include group and personal pension contributions and private healthcare schemes. It is necessary to disclose certain employee data to those companies in order that they can carry out their responsibilities.

Synergy Recruitment Consultancy Limited

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The purposes for which we can use your data:

- To pay you (using information such as your salary, bank account details, total deductions, allowances, salary increases etc.)
- To know where you work and the nature of that work, (using information such as work location, job title, cost centre, absence records etc.)
- To monitor attendance levels and assess whether you can undertake the work you are employed to do (using information such as sickness and absence records)
- To enable you to contribute to core HR processes (using information such as performance ratings, development plans, training programmes etc.)
- To enable you to participate in corporate programmes (such as bonus or commission schemes where appropriate, allowances etc.)
- To enable you and your family to participate easily in the various benefit programmes (using information such as family members to be covered by healthcare, next of kin details etc.)
- To fulfil legislative requirements (using information such as tax information, National Insurance contributions and other statutory information)
- To ensure electronic media and services are being used in compliance with the law, our contracts of employment and other company policies.

Our responsibilities to you:

We understand and will comply with its obligations under the Data Protection Act 1998 including the Data Protection Principles and Fair Processing code set out in the Act. In particular, we will:

Obtain and process data fairly and lawfully maintaining due regard to the sensitivity of the data which we hold and making adequate arrangements for its security.

Ensure that data is accurate and we do not hold more information than is necessary. If, for some reason, inaccurate data is discovered, ensure that it is corrected promptly and fully.

Your responsibilities:

Occasionally you may need us to provide information to a third party such as a building society or bank, for loan reference purposes, or to a landlord for rent purposes. Given that this information is confidential, if you expect such a request to be sent to the company, please let HR know by sending a note/email authorising us to release the information. This will ensure a quick turnaround of the request.

Please do not approach HR for the personal details of your colleagues, as such information is considered to be confidential and cannot be given out. In certain situations, however, correspondence may be forwarded on your behalf.

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Responsibility to candidates and contractors:

Candidates and contractors have the right to be informed where data are being processed, a description of the data held, purpose of the processing and the persons to whom the data may be disclosed. The request must be in writing and a fee (£10) paid in advance. The Company has up to 40 days to provide the candidate/contractor with the information.

Temporary Workers:

The Data Protection Act 1998 requires that 8 data protection principles be followed in the handling of personal data. These are that personal data must be:

- Fairly and lawfully processed
- Processed for limited purposes and not in any manner incompatible with those purposes
- Adequate, relevant and not excessive
- Accurate
- Not kept for longer than is necessary
- Processed in accordance with individuals' right
- Secure
- Not transferred to countries without adequate protection

Disclosing Personal Information:

When you supply any personal information to Synergy Medical we have legal obligations towards you in the way we handle that data. We have to collect the information fairly, and to let you know how we will use it and whether we will pass the information on to anyone else. We will hold your personal information on our systems for as long as you wish to remain on our database. We will ensure that all personal information supplied is held securely, in accordance with the Data Protection Act 1998.

Access to your Personal Information:

You have the right to access and correct your personal information and privacy preferences. This may be accomplished by writing to us at:

Human Resources Department
222 Bishopsgate
London
EC2M 4QD
Tel: 020 7422 7300
Fax: 0845 434 9573
Email: hr@edenbrown.com

Please include your employee reference number when you contact us. Please note that we reserve the right to charge a fee for responding to information requests.

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PR (Public Relations):

Where press relations is not normally part of your responsibilities, enquiries and questions from the media should be referred to the Marketing department and/or the Managing Director/CEO.

The Managing Director/CEO, prior to publication, must clear all articles or published papers where the author is identified as a Group employee.

If work for clients is described or can be identified from the context, then prior permission to use this information must be obtained in writing from the client.