

GDPR: UPDATED DATA PRIVACY POLICY

Introduction

ARUMAS HEALTH SERVICES ("We") are committed to protecting and respecting your privacy. Arumas Health Services Limited is an Occupational Health Service provider and/include Travel vaccination and information. We have a lawful basis to for processing OH (medical) information under the GDPR in providing services to our clients. We acknowledge that the information we hold is very sensitive and personal in context.

This policy (together with our terms of use www.arumas.com and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, which will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The rules on processing of personal data are set out in the General Data Protection Regulation ("GDPR").

1. Definitions

Data controller - A controller determines the purposes and means of processing personal data.

Data processor - A processor is responsible for processing personal data on behalf of a controller.

Data subject – Natural person

Categories of data: Personal data and special categories of personal data

Personal data - The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

Special categories personal data - The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, and political opinions, religious or philosophical beliefs.

Processing - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Third party - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

2. Who are we?

Jemima Nelson is the data controller. This means she decide how your personal data is processed and for what purposes. Our contact details are: 0203 372 4073, info@arumas.com or Arumas Health Services, GANCO, I Commonsides West, Mitcham, CR4 4HA. For all data matters contact Jemima Nelson.

3. The purpose(s) of processing your personal data

We use your personal data for the following purposes:

- Occupational Health Services
- Travel advice and vaccinations

4. The categories of personal data concerned

With reference to the categories of personal data described in the definitions section, we process the following categories of your data:

Personal data

- Personal information (e.g. Name, Address, Date of Birth)
- Characteristics (ethnicity, gender)
- Past and present Job roles
- Health records

We have obtained your personal data from the form you complete when you attend the clinic and when it is forwarded to us by your organisation

5. Who will it be collected from

- Human Resources
- Managers
- Employees
- Occupational Health Physicians
- Occupational Health Advisors
- Individual clients

6. How will it be collected?

- Post
- Email transmission
- Verbal

7. What is our legal basis for processing your personal data?

- Lawful basis for processing this sensitive personal information is for consent
- Additional condition - Article 9(2)(h) specifically authorises processing of data as Occupational Medicine is a special category thus *"processing is necessary for the purposes of Occupational Medicine"* and Article 9(3) which states that processing is permitted *"When these data are processed by a regulated health professional"*

More information on lawful processing can be found on the [ICO website](#).

8. Sharing your personal data

We will not share information about you with third parties without your consent unless the law allows us to

9. How long do we keep your personal data?

We keep your personal data for no longer than reasonably necessary for a period of

- Management referral information will be held for 6 years after the employee has left their job or 75 years of age (whichever is soonest) as recommended by the British Medical Association (BMA)
- Pre placement medicals will be discarded after 2 years if the employee doesn't take up the offer of the job
- 40 years in relation to Health Surveillance as required by the Health and Safety Executive (HSE)

10. How will the data be stored

Your records will be stored in accordance with Arumas Health Services' medical records storage policy following GDPR regulations.

11. Providing us with your personal data

We require your personal data

- For the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee. To ensure the health and safety of the employees at work and to allow consideration of any adjustments that may be required to support their ability to work.
- Data may also be used for research, audit or statistics but will be anonymised if this is the case.

12. Your rights and your personal data

You have the right to see any information we hold about you in your occupational health record. The right to rectification if any personal data we hold about you is inaccurate or incomplete.

The right to be forgotten – i.e. the right to ask us to delete any personal data we hold about you unless there is a need to retain it to support a potential future legal challenge.

The right to restrict (i.e. prevent) the processing of your personal data;

The right to be informed about our collection and use of your personal data;

The right of access to the personal data we hold about you.

The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation)

The right to object to us using your personal data for any particular purposes

Any such request should be made in writing and should be responded to within 4 weeks without charge. You can also request that an amendment is attached to your health record if you believe any of the information held by Arumas Health Services is inaccurate or misleading.

13. Transfer of Data Abroad

WE DO NOT TRANSFER PERSONAL DATA OUTSIDE THE EEA

14. Automated Decision Making

WE DO NOT USE ANY FORM OF AUTOMATED DECISION MAKING IN OUR BUSINESS

15. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

16. Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

17. How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact our Jemima Nelson on 0203 372 4073.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](https://ico.org.uk/global/contact-us/email/) on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England