



PRIVACY NOTICE - PENSIONS

This privacy notice explains how we process any personal or sensitive information we collect about you when you are referred or access our occupational health services.

When we refer to Pension Plan/Scheme below, this may include the Trustees, Pension Scheme/ Plan Administrator or Trustee Representatives or Administrators as appointed by the Secretary of State).

CHANGES TO OUR PRIVACY NOTICE

We keep our privacy notice under regular review.

WHO ARE WE?

Medigold Health Consultancy Limited (including its group companies or subsidiaries, appointed representatives, including medical practitioners acting on its behalf) ("Medigold Health") has its registered office at Medigold House, Queensbridge, Northampton NN4 7BF.

- Ablemed Health Ltd
- IMASS Group Ltd
- Hampton Knight

We process data on the basis of consent, legal obligation, legitimate interest and occupational health provision, and we may be either a 'Controller' or "Processor" of the personal data provided to us depending on the circumstances of the data transfer and usage.

PERSONAL DATA – WHAT IS IT?

Personal data means any information relating to an identifiable person who can be directly or indirectly identified, in particular by reference to an identifier. The processing of personal data is governed by the General Data Protection Regulation (EU) 2016/679 (the "GDPR").

SENSITIVE DATA – WHAT IS IT?

Personal data of an individual, the data subject, relating to racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; data concerning health; data concerning sex life or sexual orientation; genetic data; or biometric data where processed to uniquely identify the data subject.

PROCESSING YOUR DATA

HOW AND WHY WE USE YOUR PERSONAL DATA?

Medigold Health carries out a range of pension medical advisory services. We process and collect health information where this is necessary for the provision of medical advice on applications for early retirement due to ill health or associated pension benefits to your Pension Plan/Scheme. Data may include written, visual or audio formats.

WHAT PERSONAL DATA DO WE COLLECT ABOUT YOU?

Data may include:

- personal details which enables us to identify, verify and contact you
- Data related to staff engagement such as your role, when you started/finished your employment which enables us to make decisions regarding your application,
- Health data which enables us to make decisions regarding your application,
- Remuneration data (not in all instances) which enables us to make decisions regarding your application,
- Data related to transferred benefits (i.e. to a spouse or child)

WHERE DO WE OBTAIN YOUR PERSONAL DATA?

Your personal data comes to us via a referral as part of your application from your Pension Plan/Scheme and this may include your GP or Consultant or providers of additional services such as physiotherapy or counselling. Alternatively, we may obtain personal data directly from you. Data provided by your Pension Plan/Scheme may be in written, visual, verbal or audio format. Please note that failure to provide appropriate information may lead to our clinicians being unable to provide a medical opinion on your application.

HOW DO WE PROCESS YOUR PERSONAL DATA?

Medigold Health complies with its obligations under the GDPR by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of personal data; by protecting personal data from loss, misuse, unauthorised access and disclosure; and by ensuring that appropriate technical measures are in place to protect personal data.

CONSENT

Medigold Health will seek your consent to process your personal data with regards to applications for early retirement due to ill health or associated pension benefits.

You have the right to withdraw your consent at any time. Please note that should you withdraw your consent, your Pension Plan/Scheme may choose to act on the information they have to hand.

SHARING YOUR PERSONAL DATA

The main purpose of the service is to provide medical advice to your Pension Plan/Scheme, so data will be shared with them, but only with your consent.

Your personal data will be treated as strictly confidential, and will only be shared with third party clinicians if you provide us with your consent, the sharing of your personal data is required by law, there is a substantial public interest for us to do so (such as a danger to the wider public), or the disclosure of your personal data is of overall benefit to you when we believe that you lack the capacity to consent. Where we do not rely on your consent to share your information data we will only disclose the minimum amount of information necessary, avoiding releasing personal data where possible.

We may share **non-personally identifiable (anonymised)** information and **aggregate** information (anonymous statistical data.) for other business purposes. For instance, we may share aggregate reports with interested third parties in the development of new health related products.

HOW LONG WILL WE KEEP YOUR PERSONAL DATA?

Medigold Health will retain your personal data, only for as long as we need that personal data for the purposes of the processing, in agreement with your Pension Plan/Scheme's retention notice or statutory / legal requirements. That normally would mean for the term of agreement we have with your Pension Plan/Scheme plus 120 days. We may also retain data for other reasons such as statutory requirements or legal reasons, but we will inform you of those reasons, should they exceed the above.

Recordings will only be kept for 90 days

WHERE DO WE PROCESS YOUR PERSONAL DATA?

We do not process any of your personal data outside of the European Economic Area.

WHAT ARE YOUR RIGHTS?

- **Right of access.** The GDPR gives you the right to access copies of the personal data held about you. Your right of access can be exercised in accordance with the GDPR. The first copy of the personal data held about you will be provided free of charge but any subsequent copy may be subject to a reasonable fee based on the administrative costs of providing copies of the personal data to you.
- **Right to rectification.** You have the right to have inaccurate personal data rectified. You may also be able to have incomplete personal data completed, if appropriate.
- **Right to erasure.** You the right to have personal data erased. This is also known as the 'right to be forgotten'. The right is not absolute and only applies in certain circumstances.
- **Right to restrict processing.** In certain circumstances, such as where you have contested the accuracy of personal data, you have the right to restrict our processing of your personal data. That means that we will hold your personal data on file but that we will not process that personal data. We will inform you if for any reason the restriction on processing your personal data is lifted.
- **Right to data portability.** Where you provide personal data you have the right to be provided with a structured, commonly used and machine-readable copy and have the right, in certain circumstances, to ensure that we transmit that personal data to a recipient of your choice without hindrance (the right to data portability).
- **Right to object.** You have right to object to the processing of their personal data at any time. The right to object only applies in certain circumstances.
- **Rights related to automated decision making including profiling** –Medigold Health does not undertake this form of processing

Where any rectification or erasure of personal data or restriction of processing has taken place we shall communicate any rectification to you or erasure or restriction of processing to each recipient to whom the personal data has been disclosed, unless this proves impossible or involves disproportionate effort. We shall, if you request, inform you about those recipients.

Exercising your rights. If you wish to exercise any of your rights, or if at any point you believe the personal data we process is incorrect, you can request to see this personal data. If you would like a copy of the personal data about you that we process, or if you wish to have that personal data transferred to another company or organisation, please contact us at: datarights@medigold-health.com or by accessing our online portal at <https://www.medigoldone.com/Display/DataRightsRequest/>

If you wish to raise a complaint on how we have handled your personal data, please contact our Data Protection Officer at dpo@medigold-health.com

If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law, you have the right to lodge a complaint with the Information Commissioner's Office (ICO) at <https://ico.org.uk/>

Further information about how we process your personal data can be accessed via our website www.medigold-health.com.