



Apex Medico Privacy Policy

This Privacy policy is person specific under the following headings:

- Customers and Contacts
- Employees
- Medical Experts and Health Professionals
- Injured Parties

Version1.0

Last Update: 15/02/2020

Apex Medico Privacy Policy - Customers and Contacts

Apex (“we”) are a provider of specialist outsourcing services in the insurance and medical-legal sectors. The following privacy policy explains how we use any personal data we collect about you.

The Purpose for Processing:

We will process your personal data for the following purpose:

Marketing Activities

- To carry out market research to enable us to improve our services and product offerings.
- To provide you with information on related services and products that we think your company may be interested in

Additionally, if you are:

- An impending customer of ours (action having been taken to initiate the process of becoming a customer)
- Currently a customer of ours
- An individual acting on behalf of (1) or (2) above

(Collectively defined as “Customer”), then we will need to process your personal data for the following purposes:-

Service Provision

- As part of the process of entering into a contract with your company.
- To facilitate in the provision of services to your company.
- To provide your business with service updates or important notices.
- Fulfil our existing contractual obligations to your company.
- In order to defend any claim that may be brought against us in respect of the work we undertake as a business.
- To process your personal data in line with any legal obligations we are required to comply with. This will include our obligations to you in relation to the processing of your personal data.

Lawful Basis for Processing

We will process your personal data in line with one of the following lawful bases:

Consent

We will be processing your personal data on the basis of consent for marketing purposes.

Contractual

If you are a customer then it will be necessary for us to process your personal data as part of fulfilling the existing, or soon to be established contractual agreement between Apex Medico and the customer.

Legal Obligations

We may be required to process your personal data to comply with our legal obligations. This can include complying with a subject access request you have made, supplying personal data to public

authorities once we have verified a request or complying with a request from you to remove your data from our systems.

Categories of Recipients

- Please be aware that we will never share your information with any third parties for the purpose of selling or advertising goods or services to you.
- If your personal data is shared or stored outside the EEA, equivalent data processing safeguards such as EU-US Privacy Shield will apply.

Retention Period

If we solely process your personal data for marketing purposes, then we will retain your personal data unless you have advised us that you have withdrawn your consent.

If you are a customer, then we will need to retain your personal data for the duration of our contractual relationship. Following the termination of your contract, we will also need to retain your personal data for legal and regulatory purposes:

- Retained whilst pursuing any outstanding invoices
- For a further 7 years for HMRC audit purposes following the payment of an invoice

Your Rights:

Under the Data Protection Act you have the following rights in relation to your personal data.

- **Right to Access** - You have a right to request a copy of your personal data.
- **Right to Rectification** - You have the right to ask us at any time to make any corrections or remove any personal data that you believe is inaccurate.
- **Right to Data Portability** - You have the right to request for the information we hold about you to be provided in a portable format.
- **Right to Erasure** - You have the right to request the erasure of the personal data. However, we may still need to keep basic contact information about you if you are already or will shortly be an active customer as we will require this for contractual purposes.
- **Right to Restriction** - You have the right to request a restriction in the processing of your personal data. However, we may still need to keep basic contact information about you if you are already or will shortly be an active customer as we will require this for contractual purposes.
- **Right to Objection** - You have the right to object to the processing of your personal data. However, we may still need to keep basic contact information about you if you are already or will shortly be an active customer as we will require this for contractual purposes.

We will aim to respond to any requests relating to your rights without undue delay and in any case within 30 calendar days of receipt of your request. If we are unable to comply with a request for any reason, then we will provide you with a full justification in writing within 30 calendar days of receipt of your request. We may ask you to confirm your identity so that we can validate a request. If you would like to make a request, please email or write to us using the contact details provided below.

To Withdraw Consent

You have the right to withdraw your consent to the use of your personal data for marketing activities. You can withdraw your consent to marketing activity at any time by contacting a member of the Apex team by emailing us at info@apexmedcio.co.uk

If you are a customer, then we will still need to keep basic contact information about you as we will require this for contractual purposes.

Complaints

If you are unhappy about any aspect of our process and you would like to file a complaint, please contact us using the details below.

Changes to our Privacy Policy

We keep our privacy policy under regular review, and we will place any updates on this web page. This privacy policy was last updated on 15/02/2020.

Contact Us

If you have any further questions or would like to raise any concerns about the way in which your personal data has been processed, please feel free to contact our Data Protection Officer using the information provided below: Email: info@apexmedico.co.uk – Please indicate in the header of the email that the email is intended for the Data Protection Officer.

Write to us:

Apex Medico – Data Protection Officer

Universal Square, 1 Devonshire Street North

Manchester M12 6JH

Apex Medico Privacy Policy - Employees

This privacy notice sets out how we use any personal data that we process about you and applies to all current and former employees (“Employee”). This notice will also be applicable to anyone whose personal data has been processed as part of our recruitment process (“Applicant”).

This privacy notice is applicable to the employees and applicants of the following businesses: Apex Medico LTD

The Purpose for Processing:

We will need to process your personal data for the following reasons:

Pre-Employment

- For decisions about your recruitment or employment. This can include managing your CV, processing an application, processing your personal data as part of conducting an interview and completing any competency based assessments which we may ask you to complete.
- To check whether you are legally entitled to work in the UK.
- To carry out a DBS and background checks.

During Employment

- To process your personal data for the purpose of paying you and to ensure that the appropriate tax and national insurance contributions have been deducted.
- To enrol you in a pension arrangement in accordance with our statutory automatic enrolment duties and liaise with your pension provider as required.
- For business management and planning, including accounting and auditing.
- For the purpose of performance management and to make decisions about salary reviews and compensation.
- For absence management, specifically sickness absence
- To process your personal data for the purpose of paying you and to ensure that the appropriate tax and national insurance contributions have been deducted.

Post-Employment

- To process your personal data in line with any legal obligations we are required to comply with. This will include our obligations to you in relation to the processing of your personal data.
- To form a defence of any legal claim that may be brought against us.
- To contact you to perform an exit interview to gather feedback. In the event of this specific process occurring post-employment, we would ask for your consent prior to participation.

We can assure you that we will only ever process the minimum personal data required to carry out the processing activities identified above.

Lawful Basis for Processing

We will process your personal data in line with the following lawful bases:

Legitimate Interests

We believe that we have a genuine and legitimate reason to process your personal data as you wish to enter, or have entered, into a contract of employment with us. We do not expect that processing your personal data will harm any of your rights and interests.

Legal Obligations

We may be required to process your personal data to comply with our legal obligations. This can include complying with a subject access request you have made or supplying personal data to the HMRC following a request.

Categories of Recipients

- We will never share your information with any third parties that intend to use your personal data for their own purpose, other than what they are required to by law.
- We may need to transfer your personal data to a nominated third parties under our own legal obligations (e.g. HMRC).
- All third parties are fully vetted to ensure that your personal data is only shared and stored with third parties that comply with all applicable Data Protection Regulations, including the General Data Protection Regulation and the Data Protection Act.

Retention Period

We will retain your personal data:

Applicant: For 6 months following the completion and outcome of the recruitment exercise.

Employee: During your employment, then for a further 7 years following the termination of your employment. If you are a former employee, we will only use your personal data to the extent necessary to comply with our legal obligations (E.g. for HMRC financial accounting obligations as well as to enable us to defend any claim that may be brought against us in respect of the work we undertake as a business).

Your Rights:

Under the Data Protection Act, you have the following rights in relation to your personal data.

- **Right to Access** - You have a right to request a copy of your personal data.
- **Right to Rectification** - You have the right to ask us at any time to make any corrections or remove any personal data that you believe is inaccurate.
- **Right to Erasure** - You have the right to request the erasure of personal data. However, we may still need to retain personal data to comply with our legal obligations. In the event of a request we will provide you with full details of the personal data that we are required to retain.
- **Right to Restriction** - You have the right to request a restriction in the processing of your personal data. However, we may still be required to process personal data to comply with our legal obligations and to fulfil our obligations in respect of your contract of employment. In the event of a request we will provide you with full details of the personal data that we are required to continue processing.

- **Right to Objection** - You have the right to object to the processing of your personal data. However, we may still be required to process personal data to comply with our legal obligations and to fulfil our obligations in respect of your contract of employment. In the event of a request we will provide you with full details of the personal data that we are required to continue processing.

We will aim to respond to any requests relating to your rights without undue delay and in any case within 1 calendar month of receipt of your request. We may ask you to confirm your identity so that we can validate a request. If you would like to make a request, please email or write to us using the contact details provided below. If we are unable to comply with a request for any reason, then we will provide you with a full justification in writing within 1 calendar month of receipt of your request.

Profiling

We may from time to time use your personal data to undertake automated analysis which can have legal or similarly significant effects on you. The final decisions in relation to any of the processing listed below will be undertaken by an individual and not through an automated process.

In the table below we detail what decisions we might take, the personal data used to take those decisions, and how that decision might affect you.

Complaints

If you are unhappy about any aspect of our process and you would like to file a complaint, please contact us using the details below.

Changes to our Privacy Policy

We keep our privacy policy under regular review, and we will place any updates on this web page. This privacy policy was last updated on 15/02/2020.

Contact Us

If you have any further questions or would like to raise any concerns about the way in which your personal data has been processed, please feel free to use the details below to contact our Data Protection Officer. Alternatively, for any specific HR related queries please use the details below to contact our HR Manager, Email: info@apexmedico.co.uk.

Write to us:

Apex Medico – HR Department

Universal Square, 1 Devonshire Street North

Manchester M12 6JH

Apex Medico Privacy Policy – Medical Experts and Health Professionals

Apex Medico (“we”) are a provider of specialist outsourcing services to the insurance and legal sectors. The following privacy policy explains how we use any personal data we collect about you.

The Purpose for Processing: We will need to process your personal data for the following reasons:

Service Provision

- As part of the process of entering into a contract with you or your company.
- To use your CV and any ancillary information you have provided as a means of establishing whether you would be a suitable candidate to undertake a medical assessment and report.
- To carry out a DBS and background checks where required.
- To undertake any administrative work necessary to ensure the medical assessment and report are completed.
- To share your completed medical report with our instructing party in line with our own service requirements.
- For use as part of any external audit requirements.
- To provide you or your business with service updates or important notices.
- Fulfil our existing contractual obligations to your company.
- In order to defend any claim that may be brought against us in respect of the work we undertake as a business.
- To contact you to perform a post-service interview to gather feedback. In the event of this specific process, we would ask for your consent prior to participation.

To process your personal data in line with any legal obligations we are required to comply with. This will include our obligations to you in relation to the processing of your personal data

Marketing Activities

- To carry out market research to enable us to improve our services and product offerings.
- To provide you with information on related services and products that we think you may be interested in.

Lawful Basis for Processing

We will process your personal data in line with the following lawful bases:

Contractual

If you are a supplier then it will be necessary for us to process your personal data as part of fulfilling the existing, or soon to be established contractual agreement between Apex Medico and you or your company.

We will use your personal data when we are undertaking any marketing related activities in line with the signed Terms and Conditions.

Legitimate Interests

We will process your personal data on the basis of a legitimate interest when we are undertaking any marketing related activities. We believe that we have a genuine and legitimate reason to process your

personal data as we feel that you may be interested in hearing from us and we do not expect that processing your personal data will harm any of your rights and interests.

Legal Obligation

We may be required to process your personal data to comply with our legal obligations. This can include complying with a subject access request you have made or supplying personal data to public authorities once we have verified a request.

Categories of Personal Data Collected

As part of our processing activities we may obtain data directly from you. We may also gather the following personal data as part of our processing activities:

- Your name and contact details
- Information regarding general attributes which are relevant to the services you provide.

Categories of Recipients

- We will never share your information with any third parties that intend to use your personal data for their own purposes, other than what they are required to by law.
- We will be required to transfer your personal data to our instructing party and any relevant third party connected to the claim as advised by the instructing party for the following purposes:
 - as part of the nomination process used for selecting a suitably qualified medical professional
 - to facilitate in the progression of the medical assessment or treatment and completion of the corresponding reports
 - to include your personal data in the medical report that you create.
- We will also share your personal data with selected third parties who will assist us in our service provision to you.
- All third parties are fully vetted to ensure that your personal data is only shared and stored with companies that comply with all applicable Data Protection Regulations, including the General Data Protection Regulation and the Data Protection Act.
- Your personal data will not be shared or stored outside of the European Economic Area unless we have been specifically instructed to do this. In these exceptional cases we will notify you and advise you of the safeguards that have been adopted to ensure that all transfers comply with all applicable Data Protection Regulations, including the General Data Protection Regulation and the Data Protection Act.

Retention Period

We will retain your personal data: During your service provision and for a further 7 years for HMRC audit purposes. We will only use your personal data to the extent necessary to comply with our legal obligations (for example for HMRC financial accounting obligations as well as to enable us to defend any claim that may be brought against us in respect of the work we undertake as a business).

Your Rights:

Under the Data Protection Act you have the following rights in relation to your personal data.

- **Right to Access** - You have a right to request a copy of your personal data.
- **Right to Rectification** - You have the right to ask us at any time to make any corrections or remove any personal data that you believe is inaccurate.

- **Right to Data Portability** - You have the right to request for the information we hold about you to be provided in a portable format.
- **Right to Erasure** - You have the right to request the erasure of the personal data. However, we may still need to retain personal data to comply with our legal obligations. In the event of a request we will provide you with full details of the personal data that we are required to retain.
- **Right to Restriction** - You have the right to request a restriction in the processing of your personal data. However, we may need to keep basic contact information about you if you are already or will shortly be an active supplier as we will require this information for the fulfilment of our service provision.
- **Right to Objection** - You have the right to object to the processing of your personal data. However, we may need to keep basic contact information about you if you are already or will shortly be an active supplier as we will require this information for the fulfilment of our service provision.

We will aim to respond to any requests relating to your rights without undue delay and in any case within 1 calendar month of receipt of your request. If we are unable to comply with a request for any reason then we will provide you with a full justification in writing within 30 calendar days of receipt of your request. We may ask you to confirm your identity so that we can validate a request. If you would like to make a request, please email or write to us using the contact details provided below.

To Withdraw Consent

You have the right to withdraw your consent to the use of your personal data for marketing activities. You can withdraw your consent to marketing activity at any time using the unsubscribe link located at the bottom of any of our marketing emails. Alternatively, you can contact a member of the Expert Liaison team by emailing us info@apexmedico.co.uk

If you are a supplier then we will still need to keep basic contact information about you as we will require this for contractual purposes.

Complaints

If you are unhappy about any aspect of our process and you would like to file a complaint, please contact us using the details below.

Changes to our Privacy Policy

We keep our privacy policy under regular review, and we will place any updates on this web page. This privacy policy was last updated on 8th January 2020.

Contact Us

If you have any further questions or would like to raise any concerns about the way in which your personal data has been processed, please feel free to contact our Data Protection Officer using the information provided below: Email: info@apexmedico.co.uk – Please indicate in the header of the email that the email is intended for the Data Protection Officer.

Write to us:

Apex Medico - Data Protection Officer

Universal Square, 1 Devonshire Street North

Manchester M12 6JH

Apex Medico Privacy Policy – Injured Parties

Apex Medico (“we”) are a provider of specialist outsourcing services to the insurance and legal industries.

We have been asked to contact you by your insurer or solicitor, to carry out the following service:

- Facilitate in the creation of an independent medical report following a recent legal claim that has been made by you or a third party.
- Provision of pagination services for medical records.

The following privacy policy explains how we use any personal data we collect about you.

The Purpose for Processing:

We will need to process your personal data, and in particular personal data relating to your health, for the following reasons:

- To facilitate in the fulfilment of the above services. This can include, but is not limited to, sourcing relevant medical records, identifying a suitably qualified medical expert and arranging a face to face assessment for you.
- To provide you with service updates or important notices that we think may impact on our ability to deliver services to you.
- In order to defend any claim that may be brought against us in respect of the work we undertake as a business
- To process your personal data in line with any legal obligations we are required to comply with. This will include our obligations to you in relation to the processing of your personal data.
- To carry out market research/ feedback to help us improve our services and product offerings, however we will ask for separate consent prior to this.
- We can assure you that we will only ever process the minimum personal data required to carry out the services identified above.

Lawful Basis for Processing

We will process your personal data in line with the following lawful bases:

Legitimate Interests

We operate on the instructions of a firm that is directly engaged with you. They are responsible for ensuring that the correct controls are in place to enable us to lawfully undertake our work.

We operate on the basis that you are already actively aware of our involvement in this process and you fully expect us to provide this service to the insurer/solicitor that we have received our instructions from.

Legal Obligations

We may be required to process your personal data to comply with our legal obligations. This can include complying with a subject access request you have made or supplying personal data to public authorities once we have verified a request.

Categories of Personal Data Collected

We will have received the following information from your insurer/solicitor prior to us getting in touch with you:

- Your name, basic personal information (address, date of birth) and contact details
- Basic information relating to your claim
- We may also be provided with instructions on the type of medical expert required.
- Information relating to your health, this can include your medical records and, if applicable, we will also have sight of the medical report produced as part of our service provision.

Categories of Recipients

- We will never share your information with any third parties that intend to use your personal data for their own purposes, other than what they are required to by law.
- We will be required to transfer your personal data to the nominated medical expert as they will need this to be able to create the independent medical report.
- We will also share your personal data with selected third parties who assist us in our service provision to you.
- All third parties are fully vetted to ensure that your data is only shared and stored with companies that comply with all applicable Data Protection Regulations, including the General Data Protection Regulation and the Data Protection Act.
- Your personal data will not be shared or stored outside the European Economic Area unless we have been specifically instructed to do this by your solicitor/insurer. In these exceptional cases we will ensure that all appropriate safeguards are in place and third parties comply with all applicable Data Protection Regulations, including the General Data Protection Regulation and the Data Protection Act.

Retention Period

As a maximum, we will retain your personal data: During our service provision and for a further 7 years following the settlement of your claim

We will only use your personal data to the extent necessary to comply with our legal obligations (for example for HMRC financial accounting obligations as well as to enable us to defend any claim that may be brought against us in respect of the work we undertake as a business).

Your Rights:

Under the Data Protection Act you have the following rights in relation to your personal data.

- **Right to Access** - You have a right to request a copy of your personal data.

- **Right to Rectification** - You have the right to ask us at any time to make any corrections or remove any personal data that you believe is inaccurate.
- **Right to Erasure** - You have the right to request the erasure of the personal data. However we may still need to retain personal data to comply with our legal obligations. In the event of a request we will provide you with full details of the personal data that we are required to retain.
- **Right to Restriction** - You have the right to request a restriction in the processing of your personal data.
- **Right to Objection** - You have the right to object to the processing of your personal data.

We will aim to respond to any requests relating to your rights without undue delay and in any case within 1 calendar month of receipt of your request. If we are unable to comply with a request for any reason, then we will provide you with a full justification in writing within 1 calendar month of receipt of your request. We may ask you to confirm your identity so that we can validate a request. If you would like to make a request, please email or write to us using the contact details provided below.

As we are processing your data on the instruction of your insurer/solicitor, we act as a data processor and your insurer/solicitor remains the data controller. We will notify your insurer/ solicitor if we receive a request from you. Should your insurer/solicitor, object to us complying with your request, we will notify you accordingly.

Complaints

If you are unhappy about any aspect of our process and you would like to file a complaint, please contact us using the details below.

Changes to our Privacy Policy

We keep our privacy policy under regular review and we will place any updates on this web page. This privacy policy was last updated on 31st December 2019.

Contact Us

If you have any further questions or would like to raise any concerns about the way in which your personal data has been processed, please feel free to contact our Data Protection Officer using the information provided below: Email: info@apexmedco.co.uk – Please indicate in the header of the email that the email is intended for the Data Protection Officer.

Write to us:

Apex Medico – Data Protection Officer

Universal Square, 1 Devonshire Street North

Manchester M12 6JH