

Privacy Notice – Occupational Health

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

WHO ARE WE?

“Iqarus Limited” has its place of business at Forest Grove House, Foresterhill Road, Aberdeen, AB25 2ZP, and its registered office at c/o International SOS Assistance UK Limited, Chiswick Park, Building 4, 566 Chiswick High Road, London, United Kingdom, W4 5YE.

PERSONAL DATA – WHAT IS IT?

Personal data is information pertaining to an identified or identifiable individual that can be used on its own or in combination with other information, to identify, contact or locate an individual or natural person in context. Personal data and personal identifiable data do not include anonymised or statistical data that itself does not allow identification of you as an individual.

The processing of personal data in the UK is governed by the Data Protection Act 2018 (the “DPA”)

WHY WE USE YOUR PERSONAL DATA

Iqarus carries out a range of occupational health services. We process and collect health information where it is necessary for the protection of health and safety, and to provide advice to you, your employer or employer representative on fitness to work.

We take our obligations around handling personal data very seriously, and it is therefore important you know the various lawful bases that we rely on under the data protection laws for the processing of your data. We rely on the following lawful bases for processing your personal data:

- **Necessary for the purposes of Iqarus’ legitimate interests - Article 6 (1) (f)**
- **Processing of your Special Category Data - Article 9 (2)**
 - You have given explicit consent to the processing for one or more specified reasons (a)
 - Processing is necessary to protect your life or someone else’s (c)
 - Processing is necessary for the establishment, exercise or defence of legal claims made against Iqarus (f)
 - Processing is necessary for the purposes of preventative or occupational medicine and to assess your working capacity (h)
 - Processing is necessary for the reasons of public interest in the area of public health or ensuring high standards of quality and safety of health care (i)

HOW DO WE COLLECT YOUR DATA?

We get information about you from the following sources:

- Directly from you
- Your employer or employer representative
- Your GP or consultant (only with your consent)
- Providers of additional services such as physiotherapy

WHAT PERSONAL DATA DO WE COLLECT ABOUT YOU?

CONTACT DATA

We use personal data such as your telephone number, address, or email to contact you for purposes such as advising appointment details or dispatch of reports.

BANKING DATA

If you are self-funding your appointment, we will process bank card information at the time we take payment. This data is not stored on our systems and is processed on a Payment Card Industry Security Standard compliant banking system.

TRANSACTIONAL DATA

We collect data for any transactions carried out through our services so that we can administer the services you have with us. We may do this by tracking locations and type of services purchased (for example, travel health or health surveillance).

HEALTH DATA

We collect and process information about you and your health:

- when you are referred to us as part of your employer’s occupational health service
- as part of your application of early retirement due to ill health
- when you access our medical services including role specific medicals (for example, working in confined spaces)
- statutory health and safety requirements (for example, relating to hand arm vibration)
- for the provision of other services such as alcohol and drug testing, or wellness events.

Alternatively, it is collected through a consultation which may be face to face, video or by telephone.

AUTOMATED PROFILING AND DECISION MAKING

Iqarus does not use any automated processes for profiling or decision making about you, the outcome of any medicals or the services you might need.

SHARING YOUR PERSONAL DATA

The main purpose of occupational health is to assess your fitness for work and provide medical advice to your employer or employer representative. Therefore, data will be shared with them through certificates of fitness, and with consent, occupational health reports.

Your personal data will be treated as strictly confidential and will only be shared with providers of services such as physiotherapy, counselling or additional assessments. We will only share your personal data with third parties if you provide us with your consent, unless the sharing of your data is required by law. Where we do not rely on your consent to share your information, we will only disclose the minimum amount of information necessary, avoiding releasing personal data where possible.

On occasion personal data may be required to be disclosed to regulatory bodies such as the HSE or MCA.

We may share anonymised information and aggregated (anonymised statistics) for business purposes and to help improve our services. For example, we may share aggregate reports with interested third parties in the development of new health related products or with your employer to promote relevant health promotions.

We use third party occupational health providers and service providers to deliver parts of our services for us. Consent will be gained through “Release of Medical Information Form” process (ROMIF). We have contracts in place that instruct how your personal data will be protected and processed in line with the data protection laws.

HOW WE STORE YOUR PERSONAL DATA?

Your electronic personal data is stored securely on servers based within the EEA and any paper based personal data is held in secure document storage facilities within the UK.

HOW LONG WILL WE KEEP YOUR PERSONAL DATA?

Iqarus will only retain your data for as long as it is needed for the purposes of the processing. This is in accordance with our retention policy and any statutory requirements. A copy of this can be requested through our Data Protection Officer.

WHAT ARE YOUR RIGHTS?

- **Right of Access.** You have the right to access copies of the personal data held about you. Your request will be responded to within one month and a copy of your personal data provided free of charge. Requests found to be excessive or repetitive will be subject to a reasonable fee based on the administrative costs of providing copies of the personal data to you.
- **Right to Data Portability.** Where personal data is collected electronically 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 the recipient of your choice without hinderance.
- **Right to Correction.** You have the right to ensure that we correct the records of any personal data held about you which are inaccurate. You also have the right to ensure that we complete any incomplete personal data held about you.
- **Right to Erasure.** You have the right to ensure that we erase your personal data where there is no exemption to the request.
- **Right to Restriction.** 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 we will hold your personal data on file but that we will not be able to process that personal data. We will inform you if for any reason we are unable to comply with your request or if the restriction on processing your personal data is lifted.

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 disproportional effort. We shall, if you request, inform you about those recipients.

HOW TO EXERCISE 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 we hold about you, or if you wish to have that personal data transferred to another company or organisation, please contact our Data Protection Officer at dpo@iqarus.com

Further information about how we process your personal data can be access via our website <https://www.iqarus.com/>

HOW TO MAKE A COMPLAINT

If you wish to raise a complaint about how we have handled your personal data, please contact our Data Protection Officer.

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/>