



## **PCC associate privacy notice**

**May 2018**

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**Data controller:**       **Primary Care Commissioning Community Interest Company**  
                                  **(‘the Company’)**  
                                  **Suite 1A, West One, 114 Wellington Street, Leeds LS1 1BA**

When you are invited to join the Company’s preferred supplier database we will need to collect and process personal data relating to you in order to manage the relationship and meet legal obligations. The Company is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

### **What information does the Company collect?**

The Company will collect and process a range of information about associates. This includes:

- Name, address and contact details, including email address, telephone number and date of birth
- Passport
- Driving licence
- Copies of qualifications, professional body memberships and details of skills and experience
- Details and verification of company registration or self-employed status
- Copy of documentation from HMRC proving VAT status if you will be charging VAT
- Copies of your professional indemnity insurance and public liability insurance
- Completion and return of the PCC eligibility statement
- CV/organisational profile
- References or examples of recent work
- Photograph
- Form to provide personal information/preferences and to rate your skills/knowledge in various areas.

### **Contingent Labour 1/Public Sector Resourcing frameworks**

For those associates who work via the Contingent Labour 1 Framework (to be replaced by the Public Sector Resourcing framework from 18 June 2018) further information is required which includes:

- Information about your criminal record (where appropriate to the role)
- National insurance number

Under the Framework the information is provided to third parties to allow for the on-boarding of candidates.

The Company may collect this information in a variety of ways. For example data may be contained in CVs, from your passport or other identity documents such as your driving licence, from forms completed by you at the start of the on-boarding process, from correspondence with you or through interviews, meetings or other assessments. The Company may also collect personal data about you from third parties, such as references supplied by former employers.

### **Why does the Company process personal data?**

The Company needs to process data to include you on its preferred supplier database and to enter into any contract with you. For example, it needs to process your data to pay you in accordance with any contract between us, to include your details such as name, qualifications and photograph to support tender submissions and proposals where your support may be required. In some cases the Company needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check your eligibility to work in the UK and may be required to deduct tax. For certain positions it is necessary to carry out criminal records checks to ensure that individuals are permitted to undertake the role in question.

In other cases, the Company has a legitimate interest in processing personal data before, during and after the end of the relationship.

### **Who has access to the data?**

The data is stored securely on the Company's IT system. Your information will be shared internally for the purposes of adding you to the Company's preferred supplier database. This includes with members the business support team and finance if access to the data is necessary for performance of their roles.

Your data will not be transferred to countries outside the European Economic Area (EEA). However please note that if you sign up to receive the Company's newsletters your email address will be transferred to MailChimp who are based outside of the EEA. You have the ability to opt-in to receive these emails when you join our preferred supplier database. Data is transferred outside the EEA on the basis of Privacy Shield.

### **How does the Company protect data?**

The Company takes the security of your data seriously. It has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed and it not accessed except by our employees in the proper performance of their duties.

Where the Company engages third parties to process personal data on its behalf they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data

### **How long does the Company keep data?**

The Company will hold your personal data for the duration of your presence on the Company's preferred supplier database. Should you no longer wish to be on the database you should contact us to request this and upon receipt of this request, all personal data that we hold will be deleted.

### **Your rights**

As a data subject, you have a number of rights. You can:

- Access and obtain a copy of your data on request
- Require the Company to change incorrect or incomplete data
- Require the Company to delete or stop processing your data, for example where the data is no longer necessary for the purpose of processing; and
- Object to the processing of your data where the Company is relying on its legitimate interests as the legal ground for processing
- Ask the Company to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the Company's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact:

Wendie Groves  
Head of business support  
[Wendie.groves@pcc.nhs.uk](mailto:Wendie.groves@pcc.nhs.uk)

If you believe that the Company has not complied with your data protection rights, you can complain to the Information Commissioner.

### **What if you do not provide personal data?**

You have some obligations in order to be a member of the preferred supplier database such as confirmation of your entitlement to work in the UK. Certain information, such as contact details, your right to work in the UK and payment details have to be provided to enable the Company to enter into a contract with you. If you do not provide other information, this will hinder the Company's ability to administer the rights and obligations arising as a result of the relationship efficiently.

### **Automated decision-making**

Processes to be a member of the preferred supplier database are not based on automated decision-making.

## Review log

<b>Date</b>	<b>Summary of change</b>	<b>Action</b>	<b>Author</b>
May 2018	Creation of associate privacy notice	Notice created to comply with General Data Protection Regulations coming into effect on 25 May 2018	WJG