

**Ultralase Eye Clinics Limited (UECL)  
Privacy Policy Notice – Human Resources**

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## **1. Background:**

Ultralase Eye Clinics Limited (UECL) understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our staff and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

For the purpose of this the term 'staff' refers to:

- Full time employees
- Part time employees
- Zero hours employees
- Bank staff
- Independent contractors (including Optometrists and Surgeons)
- Volunteers and those on work experience placements
- Any other self-employed people working for the Company

## **2. Information About Us**

Ultralase Eye Clinics Limited.

Registered in England under company number 08460426.

Registered address: 96 Bristol Road, Birmingham, B5 7XJ

## **3. What Does This Notice Cover?**

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

## **4. What is Personal Data?**

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Para 6, below.

## **5. What Are My Rights?**

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Para 12.
- b) The right to access the personal data we hold about you. Para 11 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Para 12 to find out more.

- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please refer to Para 4.1 of the *HR General Data Protection Regulations Policy* for the legal reasons why the right to be forgotten may be overridden. Please contact us using the details in Para 12 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that if data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Para 12.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

## **6. What Personal Data Do You Collect?**

6.1 We may collect some or all of the following personal data which may vary according to your relationship with us:

- Name;
- Contact Details;
- DOB
- Next of Kin
- National Insurance Number
- Tax code
- Bank account details
- Passport/photo ID
- Professional membership details (e.g. nurse PIN)
- DBS (or similar) clearance certificate
- Healthcare verification (fitness to work)
- Previous employment details

6.2 Your personal data may be obtained from, provided to and/or processed by the following third party(s) – either with your consent or under the legal obligations to you as your employer:

- Recruitment agencies (Indeed, Recruitment Genius, Match2Match)
- National Employment Savings Trust (NEST)
- Her Majesty's Revenue and Customs (HMRC)
- Edenred (for childcare voucher scheme)
- Scottish Widows
- Trade Unions
- Previous employers (for the purpose of gaining/providing a reference)
- Prohms Limited (Previously Elite Executives - Occupational Health Assessors)
- Personnel Checks and Access NI (for DBS applications)
- Absolute Disclose Limited (for PVG applications)
- Next of Kin
- External training companies (iHasco, SafeCIC, Prodeceo, Bioptica)

## **7. How Do You Use My Personal Data?**

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data can be used for one or all of the following purposes:

- Communicating with you; including via email, phone and/or post
- Communicating with your next of kin in an emergency
- Supplying you with information via email, phone and/or post
- Enrolling you onto training
- Meeting our contractual and legal obligations to you (e.g. payment of salary and expenses, pension arrangements, consultation regarding employment matters, etc)
- Internal reporting functions (e.g. headcount, skills reviews, training matrices, starters/leavers, etc)
- Safeguarding your welfare (i.e. referrals to an Occupational Health Practitioner)

## **8. How Long Will You Keep My Personal Data?**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for 7 years (with some specific exceptions) in line with the HR retention periods as stated in the Company's *Confidentiality and General Data Protection Regulation ('GDPR') Policy*.

## **9. How and Where Do You Store or Transfer My Personal Data?**

We will only store or transfer your personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the GDPR or to equivalent standards by law.

## 10. Do You Share My Personal Data?

We may share your personal data with other companies.

In some cases, those third parties may require access to some or all of your personal data that we hold:

- Recruitment agencies (Indeed, Recruitment Genius, Match2Match) for the purpose of recruitment and selection
- National Employment Savings Trust (NEST) for the purpose of providing and managing your state pension.
- Her Majesty's Revenue and Customs (HMRC) for the purpose of managing your tax and National Insurance contributions
- Edenred for the purpose of providing and managing your childcare voucher scheme (entered into freely and voluntarily by you)
- Scottish Widows for the purpose of providing and managing your private pension.
- Trade Unions for the purpose of resolving any employment issues.
- Previous employers for the purpose of gaining/providing a reference.
- Prohms Limited (Occupational Health Assessors) for the purpose of safeguarding your health and welfare at work.
- Personnel Checks and Access NI for the purpose of processing DBS applications.
- Absolute Disclose Limited for the purpose of processing PVG applications.
- Next of Kin for the purpose of informing them of an emergency situation involving you.
- External training companies (as listed in section 6.2 above) for the purpose of providing mandatory and non-mandatory training.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Para 9.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

## 11. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made to the GDPR Owner via the contact details shown in Para 12.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests or if you make a request so broad it results in a huge/excessive volume of data) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

## 12. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of):

Fiona Walker – GDPR Owner

[GDPROwner@optimax.co.uk](mailto:GDPROwner@optimax.co.uk)

Mobile: +44 (0)7885 970752

Office: +44 (0)1908 394071 or +44 (0) 207 317 8643

Ultralase Eye Clinics Limited or  
128 Finchley Road  
London  
NW2 5HT

Ultralase Eye Clinics Limited  
Brooklyn House  
311 Avebury Boulevard  
Milton Keynes  
MK9 2GA

## 13. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes and updates will be made available via iHasco