Data Subject Rights Guidance

This document sets out the legal rights that you have in relation to your personal data if you are a resident within the European Union (including Great Britain) according to the General Data Protection Regulation (GDPR). If you have any questions about how we process your personal data or wish to exercise any of your rights or would like other assistance relating to data protection, please contact the Data Protection Officer on hrw-dpo@hrwhealthcare.com or on +44 1491 822 515.

Information

When we collect your personal data from you, we should tell you:

- who we are and how to contact us;
- the contact details for our Data Protection Officer;
- why we process your personal data and the legal basis for that processing;
- if we're transferring your personal data to anyone else, who we're transferring it to:
- whether we will transfer your personal data to any country outside of the European Economic Area and give some details of the safeguards we use to protect your personal data. We should also tell you how to get more information about those safeguards;
- how long we will keep your personal data for;
- what legal rights relating to your personal data;
- if we are processing your personal data based on your consent, that you may
 withdraw your consent at any time and after you have withdrawn your consent
 we will not be allowed to process your personal data in future (unless we have
 another legal basis for doing so);
- whether we make any decisions only by automated means without any human involvement relating to your personal data and we use any automated processing of your personal data to evaluate certain things about you. If we do either of these things then we give you more information about how and why we do this.

If we don't collect your personal data ourselves but instead get if from another company then normally we should tell you all of this when we first contact you and before we pass your personal data to anyone else. We should also tell you where we got your personal data from, why we need it (for example, there a legal reason or we need it to fulfil a contract with you) and what would happen if we did not have that personal data.

Access

You have the right to ask us for a copy of the personal data that we process about you. We should give you a copy unless someone else is negatively affected by that (for example if we can't give you a copy of your personal data without giving you someone else's personal data too).

If you ask us, we must confirm:

- what personal data we process about you;
- why we process your personal data;
- who we share your personal data with;
- how long we will keep your personal data for;
- whether we make any decisions only by automated means without any human involvement relating to your personal data and we use any automated processing of your personal data to evaluation certain things about you. If we do either of these things then we give you more information about how and why we do this;
- what safeguards we have in place to protect your person data if we transfer it to
 other countries outside of the European Economic Area (this includes we are an
 international organisation with offices outside of the EEA); and
- where we got your personal data from.

Rectification If any of your personal data is wrong or some data is missing then you can tell us and we must correct it. If we have transferred your personal data to anyone else then we'll let them know that they also need to correct any mistakes or gaps. We only do not have to do this if it is impossible or we have a good reason why it is too difficult. **Erasure** You have the right to have your personal data deleted without too much delay if: the personal data is no longer needed for the reason we collected; you withdraw your consent to us processing your personal data and we don't have any other legal reason to keep processing it; you object to us processing it and there're no overriding reasons for us to keep processing it; our processing was unlawful; we have to delete your personal data to comply with the law; or the personal data is processed in relation to certain services offered to a child. We don't have to delete your personal if we need to process it: to exercising the right of freedom of expression and information; to comply with a legal obligation; for public health reasons in the public interest; for archiving reasons in the public interest or for scientific, historical or statistical research reasons; or in connection with legal claims. If we have transferred your personal data to anyone else then we'll let them know that they also need to delete your personal data unless it is impossible or we have a good reason why it is too difficult. **Restriction of** In some cases you have the right to tell us to stop processing your personal data. This processing means that we are allowed to store your personal data but we cannot do anything else with it in future. This applies if: you question the accuracy of your personal data – we can't process your personal data until we've corrected any mistakes or have proven that it is correct; the processing is unlawful and want processing to be restricted instead of your personal data to be deleted; your personal data isn't needed for purposes it was collected for but you need it in connection with legal claims; or you have objected to us processing your personal data and we are checking whether there's an overriding reason for us to keep processing it. Except for storage, we are only allowed to process your personal data in future once it's been restricted: if you've agreed that we can process it; in connection with legal claims; to protect the rights of another person or company; or for reasons of important public interest. If we have transferred your personal data to anyone else then we'll let them know that they also need to restrict processing unless it is impossible or we have a good reason why it is too difficult. If you ask us then we'll tell you which people/companies we've not told to restrict processing.

If we process your personal data by automated means and either you have agreed we can process it or we need to process it to fulfil a contract with you, then you have a right to get

Data portability

a copy of your personal data from us and you can give it to another provider. Sometimes it will be possible for us to transfer it directly to the other provider.

If it is necessary for us to process your personal data for a task carried out in the public interest or if we are exercising official authority then this right will not apply.

Object

You have the right to object to certain types of processing.

If we are processing your personal data based on our legitimate interests or where we are carrying out a task in the public interest or exercising official authority (including profiling) then you can object to this by telling us that you object and why. We must stop unless we can show that there are legitimate grounds for the processing which override your rights or if we need to continue processing in connection with legal claims.

If we process your personal data for direct marketing purposes you can object at any time to that processing and we must stop processing your personal data for direct marketing reasons as soon as we receive your objection.

If we process your personal data for scientific or historical research purposes or statistical purposes you may object to this processing on grounds by telling us that you object and why. We must stop processing unless we can show that we need to process your personal data to carry out a public interest task.

Automated processing

If we make decisions about you by automated means without any human involvement (automated individual decision making) or use automated processing of your personal data to evaluate certain things about you (profiling) then we give you more information about how and why we do this and tell you how you can request human intervention or challenge any decisions we make based on this processing.

We will only do this sort of automated processing where:

- necessary for performance of a contract between you and us;
- the law allows us to do so; or
- you have explicitly said that we may.

Complain

If you are unhappy or concerned with the way we have processed your personal data you may complain to the relevant Supervisory Authority.

Our main location is England and our Supervisory Authority is the Information Commissioner's Office (https://ico.org.uk). If you live in a different country, you prefer you may lodge a complaint to the Supervisory Authority based there.