

Teladoc Health UK Limited (“Teladoc”) UK GDPR Privacy Notice – Staff

Effective Date: 20 December 2021

Introduction

This information has been produced to help you understand everything you need to know about the way Teladoc collects, uses, and shares personal data, what your legal rights are and how to exercise them.

Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller’s possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation 2016/679 (the “UK GDPR”) as enacted via the Data Protection Act 2018.

Who are we?

We are Teladoc Health UK Limited (“**Teladoc**”), registered company number 05739281, whose place of business is Tower Point, 44 North Road, Brighton, East Sussex, BN1 1YR.

Teladoc is the UK arm of a global provider of Virtual Healthcare Services (the “**Services**”). We are registered with and regulated by both the Care Quality Commission and the Information Commissioners Office.

At Teladoc We are committed to protecting and respecting Your privacy. Teladoc operates globally and is committed to full compliance with all applicable laws and regulations of any jurisdiction, and especially the General Data Protection Regulation (EU) 2016/679 (“the GDPR”). The Data Controller is Teladoc.

Fundamental Principles

Teladoc's privacy practices comply with the GDPR which includes the following protections:

- Processing Your Personal Data lawfully, transparently and fairly
- Limiting Your Personal Data use to legitimate purposes
- Limiting the processing and storage of Your Personal Data to the minimum necessary
- Making sure that the privacy notice is accurate and sufficient
- Maintaining open and transparent privacy policies
- Being accountable to You for processing Your Personal Data
- Making sure Your consent is informed and easy to withdraw
- Defining and protecting Your sensitive/special categories of data
- Ensuring third parties (external doctors) apply similar or equivalent standards of privacy controls where they process Your Personal Data on our behalf
- Not transferring Your Personal Data outside of the EU unless the recipient has provided appropriate safeguards approved by the GDPR.
- Giving You the right to concise, timely, comprehensive information regarding our processing of Your Personal Data
- Giving You the right to rectify incomplete, inaccurate, unnecessary, or excessive personal data
- Giving You the right to object (where applicable)
- Making sure We have procedures to support Your exercising of any data subject rights,
- Applying security measures, including technical and procedural support for integrity, confidentiality and availability must be provided
- Maintaining the confidentiality of Your Personal Data even after our relationship with You has terminated.

The personal data we may collect

The information about you that we may collect, hold and process is set out below:

- Name
- Sex
- Date of Birth
- National Insurance Number
- Passport
- Driving licence
- Outcome of criminal record checks and security clearances
- Postal address
- Email address
- Telephone number (home and/or mobile)
- CV/work history
- Full details of job offer
- Work references
- Relevant medical information
- Job preferences including role, geographical areas and salary
- Financial information including bank account, pension and tax details
- Any other work-related information you provide, for example education or training certificates
- A log of communication with you
- Email address
- Mobile phone number
- IP address of any device used to access the system

This information will have been provided, or will be provided, by you or a third party who we work with, such as recruitment agencies. In the case of references, these will typically be from your previous employer but may be from other persons that you offer as a point of reference.

Medical information may be supplied by a third party such as your GP, Consultant or Occupational Health.

The outcome of criminal record checks and security clearance checks, where relevant, will be supplied by the Disclosure and Barring Service or other external company applicable to the placement.

How we handle your data

Teladoc collects, uses and shares your data in order to:

- Fulfil any contractual obligations that exist between us and yourself; where we request personal data be provided to meet the terms of any such contract you will be required to provide the relevant personal data or we will not be able to enter into such a contract.
- Pursue our legitimate business interest in the proper functioning and future development of Teladoc; this is on the considered measure that it is necessary to process the personal data to achieve those purposes and that it could be reasonable to expect your data to be used in such a way.
- Comply with our various legal obligations including, amongst others:
 - Providing for financial commitments between us and yourself, or to relevant financial authorities
 - Complying with industry regulatory requirements and any self-regulatory schemes
 - Carrying out required business operations and due diligence; e.g. administration, security, reorganisations, investment or corporate/asset sales
 - Cooperating with relevant authorities for reporting criminal activity, or to detect and prevent fraud
 - Investigating any insurance claims, claims of unfair dismissal, claims of any kind of harassment or of discrimination, or any other claim whereby we may have to defend ourselves.

We acknowledge and agree that any personal data of yours that we handle will be processed in accordance with all applicable legislation and regulation.

How we hold the information

All the personal data we have is stored only in secure systems in the UK, EU and the USA.

We safeguard your personal data with tested and certified technical and organisational security controls. We educate our staff and service providers on our Privacy Policy and principles as well as their roles and responsibilities in complying with them.

We strive to keep your personal data accurate and current; and we will update or disclose it to you whenever you request us to do so. You are responsible for communicating modifications, rectifications or additions to your personal information in order that Teladoc may change it accordingly and keep it current.

You are able to access information held about you can correct inaccuracies or delete it.

Retention of your data

Your data will be retained for no longer than is necessary and in accordance with our Data Retention Policy.

Your rights

You currently have the right at any time to ask for:

- Access to your data - a copy of the information about you that we hold.
- Erasure of your data - removal of data
- Restriction of processing - restriction in the way data is processed
- Objection - correction of erroneous data
- Data Portability - transfer of your data to another provider of services
- Complaint – you can complain to the Information Commissioners Office (0303 123 1113 or via www.ico.org.uk/concerns)

Legal bases for processing the information

The legal basis upon which we hold and process your personal data is 'Consent' and 'Performance of a Contract'.

Consent - means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

Performance of a Contract - the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.

We will rely on your consent to process the information as above. Information and documentation to establish your right to work is processed by us as we are legally obliged to do so.

In respect of medical information, the basis for us processing this will depend on the circumstances but will usually be for one of the following reasons: it is necessary to protect health and safety or to prevent discrimination on the grounds of disability or where consent has been obtained, if required.

Information in relation to criminal record checks, which are relevant for some roles, will be processed on the basis that it is necessary for us to comply with the law or consent will be obtained, if required.

Once a position has been offered to you, we will process your personal data, including financial information, for the purpose of you entering into a contract to fulfil your role and to enable us to pay you, depending on the specific contractual arrangements and circumstances.

For the purposes of paying you, where relevant, we are legally obliged to provide information to HMRC.

Withdrawal of consent

If you have provided consent for the collection, use and sharing of your personal data, you have the right to withdraw this at any time by contacting us (see below).

Concerns

If you have a concern about the way in which we are collecting or processing your personal data, you should raise your concern with us in the first instance via our Data Protection Officer and/or Business Quality Team (see below) or via the Information Commissioners Office at [www.ico.org.uk\concerns](http://www.ico.org.uk/concerns).

Contact details

If You have any questions regarding this Privacy Notice, then please contact Teladoc's UK Data Protection Officer via:

- Email - ukdpo@teladochealth.com
- Phone - 0203 499 0736
- Post - Teladoc Health, Floor 4, Towerpoint 44 North Road
Brighton East Sussex BN1 1YR

Changes to the Privacy Notice

Please note that this Privacy Notice may be changed by us from time to time to reflect, amongst other things, changing legislation and regulation.