



Privacy Statement - Users of SARD/Foundry Systems V1.1 May 2018

Background and scope

This privacy statement applies to personal information processed by SARD JV Ltd in order to provide our services as contracted by your employer/designated body - eg NHS Trust, Public Health England, or other organisation which contracts our services for the provision of software (henceforth referred to as 'your Organisation'). This statement describes how and why we process your personal data and provides information about individuals' rights.

Personal data is any information relating to an identified or identifiable living person. It is our policy to be transparent about how and why we process personal data.

This statement is for your information only and is not binding. It should be used in conjunction with any agreement, contract or privacy policies put in place by your Organisation. Any Personal Data Policy or Notice provided by your Organisation shall take precedence over the particulars in this statement.

About us

Our head office is SARD JV Ltd, Suite 2D, Foresters Hall, 25-27 Westow Street, London SE19 3RY. We act as Data Processors, holding and processing your information under the instruction of your Organisation. This Organisation, which contracts our services, is the Data Controller. **This means they decide what data is processed, how it is processed and for what purposes. They then instruct us to perform this processing and we ensure that this is done securely, accurately and in line with all legal and regulatory guidelines.**

What information do we hold?

We hold your personal information in order to provide our services of Revalidation/Appraisal, MSF 360, Job Planning and Eleave software, as contracted with your Organisation. This could include some or all of the following:

- Identifying information - name, GMC number, employee number
- Contact information - email address, postal address, phone number
- Professional information - location of work, job title, Specialty/Department, qualification details

- Job planning and timetable details
- Behavioural information in the form of colleague and patient feedback and self assessment
- Appraisal data and related evidence, including reflections

For more information on the data held, please contact your Data Controller (your Organisation), as we only process data on their behalf.

Where do we get your data from?

The personal data that we have is either provided to us directly by you (through user input into the SARD/Foundry system), or by your Organisation as agreed in our service contract with them.

How we use your personal information

The information we hold will be used for the following principle purposes and legal grounds:

- To fulfil a contract we have with our client (your Organisation)
- We may also hold your personal data if we are otherwise legally required to do so

We may also use your information to help us provide support to you as an end user in the form of Live Support Chat and Support Tickets, or through email communication with our support staff.

When do we share your personal information?

Your data is only accessible by authorised users within your organisation, and by our trained support team who may access it in order to provide you with technical help. Information will not be shared outside of these authorised parties.

We will not transfer your data to any third parties other than sub-contractors agreed in our contract with your Organisation, all of which are subject to GDPR compliant Data Processing Agreements.

We do not use your data for any purposes other than those agreed in our contract in order to provide our services.

We will not share your information outside the EU unless specific safeguards are in place, for example by using approved contractual agreements and/or the destination is included in the GDPR list of countries meeting the adequacy criteria, and even then only upon the explicit agreement of your Organisation.

We will never sell your data to any third party or use automated decision making systems in relation to your personal data.

How do I know my data is safe?

In contracting SARD JV as a supplier, your Organisation has performed due diligence to ensure that we have the appropriate security and technical measures in our organisation to ensure your data is secure, accurate and appropriately accessible. We are certified to the internationally recognised security standard ISO 27001:2013 and implement rigorous controls to make sure your data remains safe while it is entrusted to us as processors.

For how long do we retain your personal information?

We only process your personal information under the instruction of your Organisation, the Data Controller, who are responsible for setting retention periods at the end of which information is returned or destroyed, as specified in our contract with them.

What are your personal rights and how do you contact us?

If at any point you believe the personal information we hold on you is incorrect, you want us to correct or delete that information, or you no longer want us to hold that information or contact you, you can exercise your rights under the current Data Protection laws. These rights include:

- Right of access
- Right to rectification
- Right to erasure
- Right to restriction of processing
- Right to data portability
- Right to object

Please note that the exercising of these rights is partly dependent upon the legal basis that your Organisation (the Data Controller), is bound by in collecting your information.

For any enquiries regarding exercising these rights concerning the data held within SARD or Foundry software please contact your Organisation's relevant information governance or revalidation department.

For enquiries regarding information security at SARDJV please contact info@sardjv.co.uk or 0208 771 4153

For more information about your personal data rights please visit the Information Commissioner Office website at: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr>