

Section 1 – Identity and contact details of controller

According to the relevant data protection law, your personal data will be processed by:

EUROPEAN TELEMEDICINE CLINIC, SL, whose registered office is at C/ Marina 16-18, floor 33, 08005 Barcelona, Spain, and Organisation and Tax number: ESB62799689, ("ETMC").

TELEMEDICINE CLINIC Ltd, whose registered office is at Mazars, 45 Church Street, Birmingham West Midlands B3 2RT, UK, and Registration number: 06958314, ("UKTMC").

AUSTRALIAN TELEMEDICINE CLINIC PTY LIMITED, whose registered office is at 13th floor, 25 Bligh Street, Sydney NSW 2000, Australia, and Registration number ABN: 99125092597, ("ATMC").

TELEMEDICINE CLINIC NEW ZEALAND LIMITED, with registered office at BDO Auckland, 4, Graham Street, Auckland Central, Auckland, 1010, New Zealand, Company number: 8595286, ("NZTMC").

Email address: dpo@unilabs.com

Your personal data will be processed by European TMC and the TMC entity liaising with and interviewing you during the recruitment process – see list of TMC entities above.

The files where your data is stored serve as our contacts directory and facilitate the administrative tasks undertaken by the Company.

Section 2 – What personal data we collect

TMC collects the following personal data related to you:

- **Recruitment related Data:** personal identification (i.e. first name, last name, photo), contact details (e-mail address), date of birth, nationality, curriculum vitae, work and educational history, including salary details, proof of qualifications (professional & educational), referee names, interview notes and documentation, working permit details.
- **Identification Data:** personal and professional contact details, date of birth, nationality.

Section 3 – Purposes of the processing and legal basis

Your personal data will be processed for the following purposes and in accordance with the legal basis as set out below:

Type of data	Purposes	Legal basis
Identification data (Such as personal and professional contact details, date of birth, and nationality). Recruitment data (such as information contained in a CV).	Have a pool of potential candidates.	The processing is in the legitimate interests of TMC to ensure business continuity and have details for potential additional resources.
Identification data Recruitment data	Establish suitability for the position.	The processing is in the legitimate interests of TMC to evaluate skills and ability of a candidate for the proposed job and the need to take the necessary measures prior to the conclusion of the employment contract.
Identification data	Control visitors access.	The processing is in the legitimate interests of TMC to secure physical access to its premises and to comply with security obligations and standards.
Identification data (Limited to personal and professional contact details)	Communicate to candidates and prospective candidates.	The processing is in the legitimate interests of TMC to develop human resources and support TMC strategy.
Identification data Recruitment data	Manage and report litigation cases.	The processing is in the legitimate interests of TMC to establish, exercise or defend legal claims.

Type of data	Purposes	Legal basis
Any other relevant data that is related to the subject of a legal claim		
Identification data Any other relevant data	<p>Perform internal and external audits to assess level of internal control and comply with regulations.</p> <p>Reports on categories of employees</p> <p>Some elements of personal data are gathered in order to send reports to relevant authorities.</p>	<p>The processing is in the legitimate interests of TMC to assess level of internal control and to ensure that TMC complies with all applicable regulations.</p> <p>The processing is necessary to comply with a legal obligation. We have to comply with regulatory requirements, such as:</p> <ul style="list-style-type: none"> • relevant minimum wage legislation • Immigration laws
Identification data Recruitment data	Create a database of potential candidates, keep them informed on our jobs' vacancies and send information about the healthcare sector and the company in the format of the newsletter.	The job applicant has given consent to TMC to be informed on TMC jobs' vacancies and to receive newsletters.

Section 4 – Profiling or Automated Decision Making

Not applicable – no profiling or automated decision making are involved in the processing activities of your personal data.

Section 5 – Indirect collection of data

Your personal data may also be indirectly collected from different sources:

Categories of personal data indirectly collected	Source
Identification data	Recruitment agencies, former employer
Personal data relating to your professional life	

Section 6 – Categories of recipients of the personal data

- Within TMC, including other TMC companies, with Human Resources department and authorized managers.
- Within Unilabs, including other Unilabs companies, with Human Resources department and authorized managers.
- With service providers acting on our behalf and assisting us in the management of our activities, such as:
 - Recruitment Platform: Jobvite

Section 7 – Data retention period

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

When personal data is no longer needed or has reached its retention period it is deleted.

Personal data might be kept for a longer period of time where it is necessary in accordance with legal requirements.

Please consult the table below for the precise retention guidelines.

Category of candidate	Retention period	Retention period
	Medical positions	Non-Medical positions

Successful candidates	When your job application is successful you will become an employee, hence you will refer to the employees privacy notice given to you.	When your job application is successful you will become an employee, hence you will refer to the employees privacy notice given to you.
If you are included in our candidate database for future opportunities related to your profile	5 years	2 years
Unsuccessful candidates/visitors	1 year	1 year

Section 8 – Transfer of personal data

Your personal data will be transferred to Australia and/or New Zealand if you are applying for an open position in Australian Telemedicine Clinic/ New Zealand Telemedicine Clinic or for reporting emergency cases from Europe.

The application that we use to manage our recruitment processes is Jobvite, a company located in USA.

As TMC is part of the Unilabs group, the data may also be transferred to the headquarters in Switzerland, which is a country recognized as ensuring an adequate level of protection.

To ensure the protection of your transferred personal data, TMC put in place relevant safeguards such as the signature of data transfer agreements based on the standard contractual clauses issued by the European Commission or, in the United Kingdom, the Information Commissioner's Office. Please write to the following address if you wish to obtain copies of such contracts: dpo@unilabs.com.

Section 9 – Data subjects rights

In relation to your personal data, you have the following rights:

- **(a) Right to object:** You can object to our processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this basis. Please contact us, providing details of your objection.
- **(b) Access to your personal data:** You can request access to a copy of your personal data that we hold, along with information on what personal data we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision making. You can make a request for access free of charge. In compliance with the GDPR, we will respond to a valid subject access request without undue delay and at the latest within one month of receiving the request. In some circumstances, we can extend the time to respond by a further two months. For example, when the request is complex. In this case, we will let you know within one month of receiving your access request and explain to you why the extension is necessary.
- **(c) Consent:** Where you have given us your consent to use personal data, you can always withdraw your consent at any time. If you withdraw your consent, TMC will cease to process your personal data.
- **(d) Rectification:** You can ask us to change or complete any inaccurate or incomplete personal data held about you.
- **(e) Erasure:** You can ask us to delete your personal data where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.
- **(f) Portability:** You can ask us to provide you or a third party with some of the personal data that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.
- **(g) Restriction:** You can ask us to restrict the personal data we use about you where you have asked for it to be erased or where you have objected to our use of it.
- **(h) No automated-decision making:** Automated decision-making takes place when an electronic system uses personal data to make a decision without human intervention. You have the right not to be subject to automated decisions that will create legal effects or have a similar significant impact on you, unless (i) you have given us your consent (ii) it is necessary for a contract between you and us, or (iii) is otherwise permitted by law. You also have certain rights to challenge decisions made about you. We do not currently carry out automated decision-making in connection with our relationship with you, but we will notify you in advance if this changes.

Section 10 – Means of exercising

To exercise your rights please fill out the web form available at this [link](#).

You can also exercise your rights by sending an e-mail to the following address: dpo@unilabs.com.

The exercise of your rights is free of charge.

Section 11 – Contact details of the Data Protection Officer

If you have any comments or questions regarding this Privacy Notice or our data handling practices, please contact the Data Protection Officer.

Email: dpo@unilabs.com

Section 12 – Right to lodge a complaint with DPA

If you are unsatisfied with the way in which we have handled your personal data or any privacy query or request that you have raised to us and you didn't receive a satisfied answer by us and/or our DPO, you have the right to lodge a complaint with a Data Protection Authority (DPA).

Please consult the table below for the contact details of the DPAs of the countries where we are established.

Data Protection Authority	Contact Details
Data Protection Authority of Spain	Agencia Española de Protección de Datos (AEPD) C/Jorge Juan, 6 28001 Madrid Tel. +34 91 266 3517 Fax +34 91 455 5699 Email: internacional@aepd.es
Data Protection Authority of UK	The Information Commissioner's Office Water Lane, Wycliffe House Wilmslow - Cheshire SK9 5AF Tel. +44 1625 545 745 E-mail: international.team@ico.org.uk
Data Protection Authority of Denmark	Datatilsynet Carl Jacobsen Vej 35 2500 Valby Tel. +33 19 32 00 Email: dt@datatilsynet.dk
Data Protection Authority of Sweden	Integritetsskyddsmyndigheten Drottninggatan 29 104 20 Stockholm Tel. +46 8 657 6100 Fax +46 8 652 8652 Email: imy@imy.se
Data Protection Authority of Australia	The Office of the Australian Information Commissioner 175 Pitt Street Sydney NSW 2000 Tel. 1300 363 992 +61 2 9942 4099 Fax +61 2 6123 5145
Data Protection Authority of New Zealand	The Privacy Commissioner's Office Level 13, 15 Shortland Street, Auckland 1010 New Zealand Tel. 0800 803 909 Email: enquiries@privacy.org.nz

If you are located in the European Union, you have the right to lodge a complaint with the DPA of the Member State of your habitual residence, place of work or place of the alleged infringement.

To find the appropriate contact details of the Data Protection Authorities members of the European Data Protection Board, please visit the EU Commission's [directory of DPAs](#).

29.04.2024