

Teladoc Health UK Limited (“THUK”) Privacy Notice - Job Applicants

Effective Date: 1 October 2024

Introduction

THUK respects your privacy and is committed to maintaining the confidentiality and security of your Personal Information. In furtherance of your employment relationship with THUK, we collect and process your Personal Information in accordance with the principles of 1) Lawfulness, Fairness and Transparency, 2) Purpose Limitation, 3) Data Minimisation, 4) Accuracy, 5) Storage Limitation, 6) Integrity and Confidentiality, 6) Accountability

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 (“**THUK**”), registered company number 05739281, whose place of business is Floor 5, Aspect House, 84-87 Queens Rd, Brighton and Hove, Brighton BN1 3XE. The Data Controller is Teladoc Health UK Limited.

THUK is a UK business and is owned by Teladoc Health Inc, a global provider. 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 THUK 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”).

As part of any recruitment process, THUK collects and processes personal data relating to job applicants. The organisation is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

What information does THUK collect?

THUK collects a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number.
- details of your qualifications, skills, experience and employment history.
- information about your current level of remuneration, including benefit entitlements.
- whether you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process.
- information about your entitlement to work in the UK; and
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health, and religion or belief.

THUK collects this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment.

THUK will also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records checks. THUK will seek information from third parties only once a job offer to you has been made and will inform you that it is doing so.

Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email).

Why does THUK process personal data?

THUK needs to process data to take steps at your request prior to entering a contract with you. It also needs to process your data to enter a contract with you.

In some cases, THUK needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.

THUK has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows THUK to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. THUK may also need to process data from job applicants to respond to and defend against legal claims.

Where THUK relies on legitimate interests as a reason for processing data, it has considered whether those interests are overridden by the rights and freedoms of job applicants, employees or workers and has concluded that they are not.

THUK processes health information if it needs to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.

Where THUK processes other special categories of data, such as information about ethnic origin, sexual orientation, health, religion or belief, age, gender or marital status, this is done for the purposes of equal opportunities monitoring with the explicit consent of job applicants, which can be withdrawn at any time by contacting our Data Protection Officer using the contact details at the bottom of this document.

For all our roles, THUK is obliged to seek information about criminal convictions and offences. Where THUK seeks this information, it does so because it is necessary for it to comply with a regulatory requirement to establish whether an individual has committed an unlawful act or been involved in dishonesty or other improper conduct/the purposes of preventing or detecting unlawful acts.

THUK will not use your data for any purpose other than the recruitment exercise for which you have applied.

If your application is unsuccessful, THUK will keep your personal data on file to meet the legal retention limits set out in the Equality Act, and in case there are future employment opportunities for which you may be suited. You are free to withdraw your consent at any time by contacting our Data Protection Officer using the contact details at the bottom of this document.

Who has access to data?

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

THUK will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. THUK will then share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks and the Disclosure and Barring Service to obtain necessary criminal records checks.

THUK will not transfer your data outside the UK.

How does THUK protect data?

THUK takes the security of your data seriously. It has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties. Storing all company data on a secure intranet network and not locally ensures strict access restrictions are maintained. THUK additionally operates a one computer per user process, thus limiting access to every device from which data could be accessed.

For how long does THUK keep data?

If your application for employment is unsuccessful (including when you have speculatively applied to us in respect of a role which is not available), we will hold your data on file for 6 months after the end of the relevant recruitment process, in order to meet the legal retention limits as set out in the Equality Act, and for consideration for future employment opportunities. At the end of that period, or once you withdraw your consent, your data is deleted or destroyed (unless we need to retain it for longer to exercise or defend any legal claims).

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your data will be held will be provided to you in a new privacy notice.

Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request.

- require the organisation to change incorrect or incomplete data.
- require the organisation to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing.
- object to the processing of your data where the organisation is relying on its legitimate interests as the legal ground for processing; and
- ask the organisation to stop processing data for a period if data is inaccurate or there is a dispute about whether your interests override the organisation's legitimate grounds for processing data.

What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to the organisation during the recruitment process. However, if you do not provide the information, the organisation may not be able to process your application properly or at all. If your application is successful, it will be a condition of any job offer that you provide evidence of your right to work in the UK and satisfactory references, as well as the necessary personal documents mandated by the Disclosure and Barring Service to obtain necessary criminal records checks.

You are under no obligation to provide information for equal opportunities monitoring purposes and there are no consequences for your application if you choose not to provide such information.

Automated decision-making

Recruitment processes at THUK are not based solely on automated decision-making.

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 THUK's UK Data Protection Officer via:

- Email - ukdpo@teladochealth.com
- Phone - 0203 499 0736
- Post - Teladoc Health UK, Floor 5, Aspect House, 84-87 Queen's Road, Brighton, BN1 3XE.

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.