

Client Privacy Notice:

Introduction

CPL Specialist Talent is registered with the UK Information Commissioners Office and is a subsidiary of CPL Resources Plc.

The Cpl Group is registered as a data controller in the Republic of Ireland for the purposes of the General Data Protection Regulation (EU) 2016/679 of the European Parliament on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data. The Cpl Group will deal with the office of the Data Protection Commissioner in Ireland as the Lead Supervisory Authority for regulating all data protection matters within the Group.

Classification

CPL Specialist Talent offers a wide range of services to its clients. The type of service that you, the client, (“**You**” or the “**Client**”) consume determines the classification of CPL Specialist Talent and the Client in relation to GDPR.

Unless otherwise agreed in writing*, CPL Specialist Talent considers its relationship with You to be a Controller to Controller relationship. GDPR does not require a formal agreement to be put in place between us. Nonetheless CPL Specialist Talent believe it would be beneficial to set our expectations in terms of the responsibilities of both CPL Specialist Talent and the Client in relation to the Personal Data which we will share with each other.

*Where the Client wishes for CPL Specialist Talent to process data on its behalf, then the Client, as Data Controller, should issue CPL Specialist Talent, as Data Processor, with written processing instructions in accordance with Article 29 of the GDPR. Should we enter into such a processing agreement then it shall supersede this policy in respect of the Data Subjects covered under that agreement.

Responsibilities

Both CPL Specialist Talent and the Client, as independent Data Controllers, shall:

- establish policies and procedures to ensure adherence with the GDPR;
- prepare a Data Privacy Policy and make same freely available to all Data Subjects.

Data storage

CPL Specialist Talent will store and process Personal Data within the European Economic Area. Data Subject consent will be obtained in the event that Personal Data needs to be sent outside of the European Economic Area.

Data Subjects and Personal Data

GDPR defines **Personal Data** as any information relating to an identified or identifiable natural person (a “**Data Subject**”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, etc.

Set out below is the Personal Data that CPL Specialist Talent and a client will most typically share with

one another in respect of each category of Data Subject. This is not an exhaustive list and not all identifiers will be shared in every case.

Client Staff	CPL Specialist Talent internal staff	Limited company contractors
Name Job title Business postal address Business email address Business telephone number(s)	Name Job title Business postal address Business email address Business telephone number(s)	Name Postal address Place of work Telephone number(s) Job description Identification number Right to Work ID documents Professional Qualifications Criminal Convictions Health checks

Further information

Should you require any further information please do not hesitate to email gdpr@righealthcare.co.uk

Data Protection Officer Contact Details

The Data Protection Officer for the business and contact details are as follows;

DPO: Odette Armitage, Operations Director

Email address: Odette.armitage@cpl.com

Phone: 07584147660