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# Introduction

This Record of Processing Activities (Record) describes how Urgent Health UK Ltd (UHUK) processes personal data. UHUK recognizes that Article 30 of the EU General Data Protection Regulation (GDPR) imposes documentation requirements on controllers and processors of data. This Record is company confidential information but UHUK will provide it to the appropriate supervisory authority on request as required by Article 30.

## Data Controller Details

Company Name: Urgent Health UK Ltd

Address: Suite 1 Osprey House, Osprey Rd

Sowton Industrial Estate

Exeter, EX2 7WN

Telephone Number: 01392 269493

Website: [www.urgenthealthuk.com](http://www.urgenthealthuk.com)

# Categories of Data Subjects

UHUK collects personal data from the following categories of data subjects:

1. UHUK members and supporters
2. UHUK vendors or suppliers
3. UHUK employees and job applicants

# Categories of Personal Data

UHUK collects the following categories of personal data about members and supporters:

1. Personal details including name and contact information
2. Device details
3. User activity details and user preferences
4. Browser history details
5. Location details
6. Electronic identification data including IP address and information collected through cookies
7. Financial details
8. Credit card information and payment details
9. Contractual details including the goods and services provided
10. Photographs
11. Special categories of personal data

UHUK collects the following categories of personal data about employees and job applicants:

1. Personal details including name and contact information
2. Date of birth
3. Gender
4. Marital status
5. Beneficiary and emergency contact information
6. Government identification numbers
7. Education and training details
8. Bank account details and payroll information
9. Wage and benefit information
10. Performance information
11. Employment details
12. Photographs
13. Driving licence and insurance details
14. Special categories of personal data, including data relating to an employee’s:
* Racial or ethnic origin
* Political opinions
* Religious or philosophical beliefs
* Trade-union membership
* Genetics, biometrics or health
* Sex life or sexual orientation

UHUK collects the following categories of personal data about suppliers:

1. Name and contact information
2. Financial and payment details

# Purposes of Data Processing

## Members and Supporters Data

UHUK collects and processes personal data about members and supporters for the following purposes:

1. Maintaining and enhancing UHUK services
2. Providing products and services and customer management
3. Account management
4. Direct marketing
5. Supporting network and system security
6. Auditing
7. Detecting and preventing fraud
8. Complying with legal obligations
9. Conducting web analytics

## Employees and Job Applicants Data

UHUK collects and processes personal data about employees and job applicants for the following purposes:

1. Recruitment and selection of employees
2. Personnel management
3. Workplace monitoring
4. Human resources administration including payroll and benefits
5. Complying with legal obligations
6. Education, training, and development activities

## Suppliers Data

UHUK collects and processes personal data about suppliers for the following purposes:

1. To obtain products and services
2. Vendor administration, order management, and accounts payable
3. Evaluating potential suppliers
4. Detecting and preventing fraud

## Processing Records

UHUK having considered the lawful basis for processing records:

1. Consent – this is brought to the attention of data subjects in our privacy policy and privacy notice
2. Contract – this is brought to the attention of data subjects in our privacy policy and privacy notice
3. Legal obligation – this is brought to the attention of data subjects in our privacy policy and privacy notice
4. Legitimate interests - this is brought to the attention of data subjects in our privacy policy and privacy notice

# Categories of Personal Data Recipients

UHUK may be required to disclose personal data to the following categories of recipients:

1. Business partners when required by a member or if necessary to provide the services to a member
2. Other specialists and experts when required by a member
3. Sponsors of conferences and other events
4. Delegates lists for conferences, workshops and other events
5. On our website and in membership newsletters
6. Auditors and professional advisors, such as lawyers and consultants
7. Federal, state, and local law enforcement officials
8. Regulators for an audit
9. Third-party service providers, such as providers of:
* IT system management
* Information security
* Human resources management
* Payroll administration
* Retirement plan administration

# Data Registers

UHUK retains the following registers:

1. Access request register
2. Personal data breach register
3. Data impact assessment register
4. Register of contracts with processors and copies of contract
5. Register of assessment and review of data protection policies and procedures

# Personal Data Retention Periods

Except as otherwise permitted or required by applicable law or regulation, UHUK only retains personal data for as long as necessary to fulfil the purposes UHUK collected it for, as required to satisfy any legal, accounting, or reporting obligations, or as necessary to resolve disputes. To determine the appropriate retention period for personal data, UHUK considers the amount, nature, and sensitivity of personal data, the potential risk of harm from unauthorized use or disclosure of personal data, the purposes for processing the personal data, whether the employer can fulfil the purposes of processing by other means, and any applicable legal requirements.

UHUK typically retains personal data for the periods set out below, subject to any exceptional circumstances or to comply with laws or regulations that require a specific retention period:

## Information about Members and Supporters

Retention period refers to after being a member:

* personal details including name and contact information: six years
* device details: six years
* user activity details and user preferences: six years
* browser history details: six years
* location details: six years
* electronic identification data including IP address and information collected through cookies: six years
* contractual details including the goods and services provided: six years

## Information about Employees and Job Applicants

Retention period refers to after being an employee:

* personal details including name and contact information: six years
* date of birth: six years
* gender: six years
* marital status: six years
* beneficiary and emergency contact information: six years
* government identification numbers: six years
* education and training details: six years
* bank account details and payroll information: six years
* wage and benefit information: six years
* performance information: six years
* employment details: six years
* special categories of personal data, including information that relates to an employee’s racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, genetics or health, and sex life or sexual orientation: six years

## Information about Suppliers

Retention period refers to after ceasing to be a supplier:

* name and contact information: six years
* financial and payment details: six years

# Technical and Organisational Security Measures

UHUK has implemented the following technical and organisational security measures to protect personal data:

1. Encryption of personal data
2. Segregation of personal data from other networks
3. Access control and user authentication
4. Employee training on information security
5. Written information security policies and procedures

# Changes to this Record of Processing Activities

UHUK reserves the right to amend this Record of Processing Activities from time to time consistent with the GDPR and other applicable data protection requirements.