

# PRIVACY NOTICE

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## 1 General

Servisource Recruitment Limited ('Servisource') is committed to protecting all personal, special, and criminal categories of data held on you.

Servisource is part of the Cpl Group of companies and for data protection purposes, is the controller and responsible for your personal data.

Servisource Recruitment Limited consists of the following brands and companies, referred to as 'Servisource' throughout this Privacy Notice:

- Recruit Island
- Myhomecare
- Allied Admissions
- Servisource Training
- Servisource Healthcare

As such, Servisource wants you, the 'data subject', to understand how Servisource collects, uses, stores, and shares your personal data. Servisource also wants you understand what rights you can invoke to help you to protect your privacy. In this regard, it is important that you read this Privacy Notice and understand how Servisource uses your personal data. Please note that Servisource reserves the right to update this Privacy Notice as required. The most recent version of this document can be found on Servisource's website through the following link: <https://servisource.ie/privacy-policy/>

### 1.1 Servisource Information

Servisource is a leading international supplier of high quality and innovative healthcare solutions. Servisource provides innovative workforce managed services solutions and managed staffing solutions to clients.

If you wish to locate further information on Servisource, you can find this on the Servisource website through the following link: <https://servisource.ie/>

### 1.2 Legislation

All personal data we gather will be processed in accordance with all applicable data protection laws and principles, including the GDPR and the Data Protection Acts 1988 – 2018 and, any other law and regulatory requirements relating to the processing of personal data and to privacy including, Directive 2002/58/EC and the European Communities (Electronic Communications Networks and Services) (Privacy and Electronic Communications) Regulations 2011.

#### Queries and Complaints

If you are unhappy with the way Servisource handles your personal data and wish to complain, or if you simply want further information about the way your personal data will be used, please contact Servisource at the below:

**Data Protection Officer**  
**Servisource Healthcare**

83 Merrion Square  
Dublin 2,  
Ireland  
Telephone: +353 01 473 0474  
Email: [dataprivacy@cpl.com](mailto:dataprivacy@cpl.com)

You have the right to lodge a complaint with the Data Protection Commission. To contact the Data Protection Commission, please use the following details:

**Data Protection Commission**

21 Fitzwilliam Square South  
Dublin 2  
D02 RD28  
Ireland  
Telephone: +353 (0)761 104 800  
Telephone: +353 (0)57 868 4800  
Email: [info@dataprotection.ie](mailto:info@dataprotection.ie)

### 1.3 Breaches

Servisource will take all appropriate technical and organisational steps to safeguard your personal data. In the unlikely event of a data breach, Servisource will contact you in line with Servisource's legal obligations.

## 2 How Does Servisource Collect Information?

Servisource collects personal data to enable the provision of services to support the Servisource purpose. The following non-exhaustive methods of data collection are an indication of ways in which Servisource may obtain your information:

- Obtain personal data directly from you;
- Personal data that Servisource receives from other sources; and
- When entering Servisource's premises, you will be recorded on CCTV surveillance and the Visitor Sign In tablet/book for security purposes.

It is important that the personal data you provide Servisource is up to date and accurate. As outlined in Section 7.4 of this notice, if personal data Servisource holds on you is inaccurate or incomplete, please contact Servisource and Servisource will update the information.

### 3 What Does Servisource Use Information For?

#### 3.1 Process, Purpose, and Lawful Basis

Servisource uses personal data collected to fulfil Servisource’s obligations to provide recruitment services and to enable the provision of services to support Servisource’s purpose.

Servisource uses personal data for any of the following purposes:

Process	Purpose	Lawful Basis
<b>Pre-Recruitment</b>	To register a prospective data subject’s interest in recruitment for employment.	Processing is necessary in order to take steps at the request of the data subject prior to entering into a contract.  The processing is necessary for the exercise of rights and obligations under employment law.
<b>Background Checks</b>	To verify if the data subject is qualified and eligible for certain positions within Servisource.	Processing is necessary for compliance with a legal obligation to which Servisource is subject.
<b>Recruitment and Selection</b>	To complete the recruitment process and assess data subject suitability.	Processing is necessary in order to take steps at the request of the data subject prior to entering into a contract.  Processing relates to Servisource’s obligations in employment and for assessing data subject’s work capacity.
<b>Pension</b>	To administer data subjects pension entitlements and to comply with pension rules.	To comply with various pension laws.  Processing is necessary for the performance of a contract to which the data subject is party.
<b>Payroll</b>	To enable Servisource to effect payment to the data subject.	Processing is necessary for the performance of a contract to which the data subject is party.

<b>Personnel File</b>	To comply with employment and revenue laws and to ensure that terms and conditions of employment are adhered to.	Processing is necessary for the performance of a contract to which the data subject is party.  To comply with various employment and revenue laws.  To protect the vital interests of the data subject in the event of an accident or emergency.
<b>Entitlement to Work</b>	To enable Servisource to achieve compliance with its obligations pursuant to any local legislation governing the entitlement to work.	Processing is necessary for compliance with a legal obligation to which Servisource is subject.
<b>Time and Attendance Records</b>	To enable the data subject to avail of their rights and entitlement pursuant to the Organisation of Working Time Act 1997.	The processing is necessary for the performance of contract to which the data subject is party.
<b>Statutory Entitlement</b>	To enable Servisource to achieve compliance with: <ul style="list-style-type: none"> <li>• Its obligation to the data subject;</li> <li>• Record keeping obligations pursuant to a variety of employment law statutes.</li> </ul>	The processing is necessary for compliance with legal obligation to which Servisource is subject.
<b>Training Records</b>	To ensure that Servisource is in a position to assess the data subject's training needs and to capture proof of training.	The processing is necessary for the performance of contract to which the data subject is party.
<b>Performance Details</b>	To manage the data subject's performance in accordance with relevant Servisource policies.	The processing is necessary for the performance of contract to which the data subject is party.
<b>Grievance and Disciplinary</b>	To ensure the data subject's complaints are fairly investigated in accordance with Servisource policies.	To comply with Servisource legal obligation to apply fair procedures to any data subject's investigation.

		The processing is necessary for the performance of contract to which the data subject is party.
<b>Medical Information</b>	To manage the data subject's absences, to manage sick pay in accordance with the contract of employment, and to manage the fitness to work of data subjects.	Processing is necessary to assess, subject to data subject safeguards, the working capacity of the data subject.  To carry out obligations and exercise rights under employment law.
<b>Making or Receiving Payments</b>	To make or receive any payments in the discharge of normal business functions, dispute settlement, or to carry out any other payment requirements.	Processing is necessary for compliance with various employment and revenue laws.  The processing is necessary for the performance of contract to which the data subject is party.
<b>Voice of the Customer</b>	To obtain the data subject's feedback by survey on the Servisource recruitment processes, client services and for research purposes.	Processing is based on request of consent which will be taken from the data subject.
<b>Attracting Talent</b>	To provide support and assistance on recruitment services to data subjects via third party sources, such as LinkedIn and other job sites, from which Servisource obtain personal data.	Processing is based on legitimate interest.
<b>Supporting Talent</b>	To support data subjects in their career guidance and communicate with them directly with useful information, advice, and support materials through email, messaging, or mobile/web notification.	Processing is based on legitimate interests and contractual obligations.
<b>Regulatory Compliance</b>	To comply with financial regulations and any other relevant laws and regulations.	Processing is necessary for compliance with a legal obligation to which Servisource is subject.

		Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
<b>Third Party Data Sharing</b>	To allow Servisource to conduct and carry out functions with third party service providers that enable Servisource to deliver services.	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
<b>Back-ups</b>	To store personal data and make back-ups of that data in case of emergencies and for disaster recovery purposes.	Processing is necessary for compliance with a legal obligation to which the Servisource is subject.
<b>Evidence Submissions</b>	To gather information for dispute resolution services and legal proceedings.	Processing is necessary for compliance with a legal obligation to which the Servisource is subject.
<b>Transfer of Information for Parties Legal Proceedings</b>	To allow parties to commence legal proceedings.	Processing is necessary for compliance with a legal obligation to which the Servisource is subject.
<b>CCTV systems</b>	For the security, health, and safety of individuals on Servisource premises.	Processing is based on legitimate interest and is necessary for compliance with a legal obligation to which the Servisource is subject.
<b>Accidents and Incidents</b>	To enable Servisource to comply with employee record keeping obligation pursuant to the Safety, Health, and Welfare Act 2005.	Processing is necessary for compliance with a legal obligation to which the Servisource is subject.
<b>Servisource application ISAAC (Independent</b>	To enable vulnerable or elderly people to live safely at home longer and independently by	Processing is based on consent from the individual or where necessary through a power of attorney.



<b>Support and Ambient Care)</b>	providing them with assistive technology devices,	
<b>Covid-19 testing</b>	To conduct COVID-19 tests for personnel who require this service.	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

## 4 Who Does Servisource Share Information With?

It may be necessary to transfer your personal information to other group companies or service providers located in countries outside of the European Economic Area (EEA). In certain circumstances, we may disclose personal data such as CVs between entities in the CPL Group under legitimate interest in order to provide services to candidates and clients. Servisource will take all reasonable steps necessary to ensure that your information is treated securely and in accordance with our Privacy Notice.

If we transfer personal data to a third party or outside the EEA we, as the data controller, we will ensure the recipient has the necessary protections in place, such as Standard Contractual Clauses or an Adequacy Decision. Where we engage a third party to provide a service to us, we ensure the provider has taken appropriate technical and organisational measures to process, store, and safeguard your personal data.

While the parties Servisource engage may change occasionally, Servisource believe it is important you are aware of the types of parties Servisource shares data with. The categories and types of third parties outlined below is a non-exhaustive list but provides an indication of the parties Servisource shares data with.

### 4.1 Other Third Parties

Third parties for the purposes of internal and external audits, carrying out research, general practitioners, and or third parties who may improve Servisource’s processes and services (such as consultants, ).

### 4.2 Government Departments, Bodies or Agencies

Servisource is legally obligated to share personal data with state actors which is outlined in the Data Protection Act 2018.

Recipients of this data include Government departments, agencies, bodies, investigatory bodies, local authorities, and the Gardaí.

## 5 What Type of Information is Collected?

To fulfil Servisource’s mandate and perform tasks as outlined in this statement, Servisource needs to collect various types of personal data.

While the type of personal data may change occasionally, Servisource believes it is important you are aware of the types of data Servisource gathers and uses. The following table is a non-exhaustive list and provides an indication of the categories and types of data Servisource uses to perform Servisource’s tasks.

Please note that information listed under one category may be used for the performance of a task or in relation to activities under another heading or as outlined under Section 3.

Category	Type of Data
Candidates	<ul style="list-style-type: none"> <li>• Name, education, date of birth, phone number, address, email address, work experience, next of kin, bank details, PPS number and training records.</li> <li>• Medical data, health screening, health diagnosis, blood test results and immunisations, health / medical declarations.</li> <li>• Criminal data such as garda vetting documents.</li> </ul>
Employees	<ul style="list-style-type: none"> <li>• First name, last name, date of birth, address, contact details, email address, family details, financial, tax, pension, remuneration details, performance details, visual images details, employee ID, CCTV footage, lifestyle and social circumstances, education, and training details, grievance and disciplinary documents such as incident reports and complaints.</li> <li>• Special data such as medical checks, medical records, sick leave details.</li> <li>• Criminal data such as garda vetting documents.</li> </ul>
Other Stakeholders	<ul style="list-style-type: none"> <li>• Contact details, first name last name, email address, images, bank details and payment details.</li> </ul>

## 6 How Long Does Servisource Retain Information?

Servisource has developed a record retention schedule for all the personal data Servisource holds. Each retention period varies dependent on the nature and the purpose of the processing.

The main factors which determine retention periods are as follows:

1. How long it is required to perform the task;
2. Any legal requirements to hold onto the data;
3. Any pending legal actions.

## 7 What Are Your Rights?

As a data subject, you will have the following rights as outlined in this section 7. **However, restrictions may apply in certain situations.**

### 7.1 Where do I send requests?

Please send all your requests to the contact details provided in Section 1, with as much detail as possible about your requirements to allow Servisource to deal with your request efficiently. To answer your request, Servisource may ask you to provide identification for verification purposes.

### 7.2 How long will a request take?

Upon receipt of a request, Servisource will have 30 days to provide an answer with an extension of two further months if required. If Servisource requires more time to deal with your request, Servisource will notify you of the delay and the reasons behind it within 30 days of the receipt of the request. If Servisource refuses your request, Servisource will also notify you within 30 days of the receipt of the request accompanied by the reasons for the refusal.

Servisource will not charge a fee for any requests, provided Servisource does not consider them to be unjustified or excessive. If Servisource considers these to be unjustified or excessive, Servisource may charge a reasonable fee (also applicable for multiple copies) or refuse the request.

You are entitled to contact the Data Protection Commission if Servisource refuses your request.

### 7.3 Right of Access

You have a right to know what personal data Servisource hold on you, why Servisource holds the data, and how Servisource is processing your personal data.

When submitting your request, please provide Servisource with information to help verify your identity and provide as much detail as possible to help Servisource understand the information you wish to access (i.e. date range, subject of the request) and email [dataprivacy@cpl.com](mailto:dataprivacy@cpl.com). You can also request access to your personal data through our website on: <https://servisource.ie/subject-access-request/>

Please note that an access request is free of charge, however, where Servisource determines a request to be unjustified or excessive, Servisource may charge you a reasonable fee.

#### 7.4 Right to Rectification

You have a right to request that Servisource information held on you is up to date and accurate.

Where information is inaccurate or incomplete, Servisource encourage you to contact Servisource to have this information rectified. Upon receipt of request, Servisource will ensure that the personal data is rectified and as up to date as is reasonably possible.

#### 7.5 Right to be Forgotten

You have the right to seek the erasure of your personal data in the following circumstances:

- The personal data is no longer required for the purposes for which it was obtained;
- Where data is being processed on the basis of consent, you withdraw consent to the processing and no other lawful basis exists;
- The personal data is being unlawfully processed;
- You object to the processing of personal data and there are no overriding legitimate grounds for the processing;
- Your personal data requires deletion in line with legal requirements.

However, Servisource will be unable to fulfil an erasure request if the processing of personal data is necessary for the following:

- Exercising the right of freedom of expression and information;
- Compliance with a legal obligation or for the performance of a task carried out in public interest;
- Reasons of public interest in the area of public health;
- Archiving or statistical purposes in the public interest;
- The establishment, exercise, or defence of legal claims;

Please note that where the legal basis for Servisource's processing of personal data is on the basis of a legal obligation, some processing in relation to your data may not be subject to the right to erasure.

To determine your request for erasure, Servisource will carry out an assessment of the justification for the retaining your personal data where a legal requirement applies and contact you if Servisource is unable to fulfil your request.

Please be aware that in some circumstances Servisource may need to retain some information to ensure all your preferences are properly respected. For example, Servisource cannot erase all information about you where you have also asked Servisource not to send you marketing

material. Otherwise, Servisource would delete your preference not to receive marketing material.

## 7.6 Right to Restriction

You have the right to restrict the extent of personal data processed by Servisource in circumstances where:

- You believe the personal data is not accurate (restriction period will exist until Servisource updates your information);
- The processing of the personal data is unlawful, but you wish to restrict the processing of data rather than erase it;
- Where the personal data is no longer required by Servisource, but you require retention of the information for the establishment, exercise, or defence of a legal claim;
- You have a pending objection to the processing of the personal data;

When processing is restricted, your personal data will only be processed: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of other people; or for reasons important to public interest.

Servisource will contact you confirm where the request for restriction is fulfilled and will only lift the restriction after Servisource has informed you that Servisource is doing so.

## 7.7 Right to Data Portability

You have the right to the provision of all personal data held in relation to you in a structured, commonly used and machine-readable format where:

- Processing is completed on the basis a contract;
- Processing is completed based on consent by the you;
- Processing is carried out by automated means.

You may also request that Servisource sends this personal data to another data controller where technically feasible.

## 7.8 Right to Object

You have the right to object to the processing of your personal data; however, the processing must have been undertaken on the basis of public interest or legitimate interest by Servisource.

If you wish to object to the processing of data, please contact Servisource with your request. Servisource will then stop the processing of personal data unless it is required for legal proceedings.