

PRIVACY NOTICE

Document Title	Privacy Notice
Version	V 7.0
Owner	DPO Team
Approved by	Jane O'Rourke
Next Review	July 2026
Date	July 2025

Table of Contents

1	General	3
1.1	Servisource Information	3
1.2	Legislation	3
1.3	Queries and Complaints.....	3
1.4	Breaches.....	4
2	How Does Servisource Collect Information?	4
3	What Does Servisource Use Information For?	5
3.1	Process, Purpose, and Lawful Basis	5
4	Who Does Servisource Share Information With?.....	9
4.1	Other Third Parties.....	10
4.2	Government Departments, Bodies or Agencies	10
5	What Type of Information is Collected?.....	10
6	How Long Does Servisource Retain Information?	11
7	What Are Your Rights?	11
7.1	Right of Access	11
7.2	Right to Rectification.....	12
7.3	Right to be Forgotten.....	12
7.4	Right to Restriction	13
7.5	Right to Data Portability.....	13
7.6	Right to Object	14
7.7	Right to Withdraw Consent.....	14
7.8	Right to Object to Automated Decision Making.....	14
8.	Changes to This Policy.....	14

1 General

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

- Servisource Recruitment
- Myhomecare
- Allied Admissions
- Servisource Training
- Education Support Services
- Autism Assessment Services
- Occupational Healthcare
- Isaac Care

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.

1.3 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

Ground Floor,
One Haddington Buildings,
Haddington Road,
Dublin 4,
D04 X4C9,
Ireland
Telephone: +353 1 614 6000
Email: 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

1.4 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;
- Data we obtain during the provision of our services;

- When entering Servisource's premises, you will be recorded on CCTV surveillance and the Visitor Sign In 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 we 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
Pre-Recruitment	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.
Background Checks	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.
Recruitment and Selection	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.

Pension	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.
Payroll	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.
Personnel File	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.
Entitlement to Work	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.
Time and Attendance Records	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.
Statutory Entitlement	To enable Servisource to achieve compliance with: <ul style="list-style-type: none"> • Its obligation to the data subject; • Record keeping obligations pursuant to a variety of employment law statutes. 	The processing is necessary for compliance with legal obligation to which Servisource is subject.
Training Records	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.

Performance Details	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.
Grievance and Disciplinary	To ensure the data subject's complaints are fairly investigated in accordance with Servisource policies.	<p>To comply with Servisource legal obligation to apply fair procedures to any data subject's investigation.</p> <p>The processing is necessary for the performance of contract to which the data subject is party.</p>
Medical Information	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.	<p>Processing is necessary to assess, subject to data subject safeguards, the working capacity of the data subject.</p> <p>To carry out obligations and exercise rights under employment law.</p>
Making or Receiving Payments	To make or receive any payments in the discharge of normal business functions, dispute settlement, or to carry out any other payment requirements.	<p>Processing is necessary for compliance with various employment and revenue laws.</p> <p>The processing is necessary for the performance of contract to which the data subject is party.</p>
Voice of the Customer	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.
Attracting Talent	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.
Supporting Talent	To support data subjects in their career guidance and communicate with them directly	Processing is based on legitimate interests and contractual obligations.

	with useful information, advice, and support materials through email, messaging, or mobile/web notification.	
Regulatory Compliance	To comply with financial regulations and any other relevant laws and regulations.	<p>Processing is necessary for compliance with a legal obligation to which Servisource is subject.</p> <p>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.</p>
Third Party Data Sharing	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.
Back-ups	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.
Evidence Submissions	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.
Transfer of Information for Parties Legal Proceedings	To allow parties to commence legal proceedings.	Processing is necessary for compliance with a legal obligation to which the Servisource is subject.
CCTV systems	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.

Accidents and Incidents	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.
Servisource application ISAAC (Independent Support and Ambient Care)	To enable vulnerable or elderly people to live safely at home longer and independently by providing them with assistive technology devices,	Processing is based on consent from the individual or where necessary through a power of attorney.
Occupational Health Screening	Providing comprehensive health checks for companies nationwide. The aim of health screening is to detect non-symptomatic disease or alternatively lifestyle factors that may lead to disease and to intervene early so that either further progression can be stopped or that the eventual outcome will be improved.	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.
Call Recording	Recording calls for the purpose of monitoring quality, training staff and ensuring service standards. In some instances, call recordings may be subject to reviews from the management team, including reviews of recorded interactions with clients or carers.	Processing is based on legitimate interest in maintaining and improving service quality and for training purposes.

4 Who Does Servisource Share Information With?

It may be necessary to transfer your personal information outside of the organisation. In certain circumstances, we may disclose personal data such as CVs between entities within Servisource 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.

On occasion, we may need to transmit your personal data outside of the European Economic Area. In these circumstances, we will ensure that the transfer complies with our data protection obligations, and we will ensure that the transfer agreement is based on an approved transfer mechanism, such as the European Commission's 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 organizational 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 An Garda Síochána.

5 What Type of Personal Data is Collected?

To fulfil Servisource's mandate and provide our services, 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">Name, education, date of birth, phone number, address, email address, work experience, next of kin, bank details, PPS number, training records (including qualification).Medical data: occupational health screening.Criminal data such as garda vetting documents.

Employees	<ul style="list-style-type: none">• 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.• Special category data such as medical checks, medical records, sick leave details.• Criminal data such as garda vetting documents.
Other Stakeholders	<ul style="list-style-type: none">• Contact details, first name last name, email address, images, bank details and payment details.

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. (*Please see Servisource Retention Policy_v1*).

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 below rights in relation to the processing of your personal data. *Please note that these rights are not absolute, and restrictions may apply in certain situations.*

7.1 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. You can also request access to your personal data through our website on: <https://servisource.ie/subject-access-request/>

Upon receipt of a valid request, Servisource will have one calendar month to respond to your request, with the possibility of extending by two further months. If we require more time to deal with your request, we will notify you of the delay and the reasons behind it within 30 days of the receipt of the request. If we refuse your request, we 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 we do not consider them to be unjustified or excessive. If we do consider a request to be unjustified or excessive, we 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.

7.2 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 us 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.

7.3 Right to Erasure

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:

- Compliance with a legal obligation, such as the performance of a contract or compliance with certain legislation.

- For the performance of a task carried out in the public interest.
- Archiving, research or statistical purposes in the public interest.
- The establishment, exercise or defence of legal claims

7.4 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;
- for reasons important to public interest.

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

7.5 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 of a contract;
- Processing is completed based on consent by 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.

7.6 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.

7.7 Right to Withdraw Consent

Where Servisource are processing your personal data based on your consent, you will have the right to withdraw your consent at any time. If you wish to withdraw your consent, please contact us with your request. We will then stop the further processing of your personal data.

7.8 Right to Object to Automated Decision Making

You have a right not to be subject to a decision based solely on automated processing or profiling, where such decisions would have a legal effect or significant impact on you. Currently, we do not employ any systems which use automated decision making or profiling on data relating to our candidates.

Where we (or one of our third-party processors) use profiling, which produces legal effects for you or otherwise significantly affects you, you will have the right to object to such processing.

8 Changes to our Privacy Notice

We will review this Privacy Notice regularly and reserve the right to make changes at any time to take into account changes in our business, legal requirements, and the manner in which we process personal data. This Privacy Notice was last updated on 18/07/2025.