

Privacy notice for call recording

This privacy notice explains how we use recordings of phone calls within Firstpoint Healthcare (the Company).

Personal data

When a call is recorded we collect:

- a digital recording of the telephone conversation
- the telephone number of both parties (internal and external)

Personal data revealed during a telephone call will be digitally recorded for example name and contact details to deliver appropriate services.

Occasionally 'special category' personal information may be recorded where an individual voluntarily discloses health, religious, ethnicity or criminal information to support their request for advice and/or services.

Collecting personal data

The recordings will be stored on a secure server hosted by our phone provider (currently 8x8) which will only be accessible by senior members of the management team, who will be issued with a username and password.

Call recordings will be used:

- to assist in the quality monitoring of staff performance
- to investigate and resolve complaints
- to identify training needs
- to ensure the Company is able to monitor and adhere to quality standards

Sharing personal data

We may share a call recording with an Investigating Officer in order for them to respond to a complaint or issue.

Sharing data under Data Protection legislation

We may be required or permitted, under Data Protection legislation, to disclose a call recording including your personal data without your explicit consent, for example if we have a legal obligation to do so, such as for:

- Law enforcement
- Safeguarding investigations
- Regulation and licencing
- Criminal prosecutions
- Court proceedings

What is the legal basis that permits us to use your information?

Under data protection legislation we are only permitted to use your personal data if we have a legal basis for doing so as set out in the data protection legislation. We will process your personal data for the purposes of providing you with work-finding services. The legal bases we rely upon to offer these services to you include at least one of the following:

- Consent
- Contractual obligation
- Legal obligation
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests

Retaining personal data

Recordings are kept securely and confidentially. They will be held for no more than 30 days, unless required to be retained for an investigation, legal reasons or a potential safeguarding concern.

Your rights in relation to your information

You have a number of rights in relation to your personal data, these include the right to:

- be informed about how we use your personal data;
- obtain access to your personal data that we hold;
- request that your personal data is corrected if you believe it is incorrect, incomplete or inaccurate;
- request that we erase your personal data in the following circumstances:
 - if we are continuing to process personal data beyond the period when it is necessary to do so for the purpose for which it was originally collected;
 - if we are relying on consent as the legal basis for processing and you withdraw consent;
 - if we are relying on legitimate interest as the legal basis for processing and you object to this processing and there is no overriding compelling ground which enables us to continue with the processing;
 - if the personal data has been processed unlawfully (i.e. in breach of the requirements of the data protection legislation);
 - if it is necessary to delete the personal data to comply with a legal obligation.
- ask us to restrict our data processing activities where you consider that:
 - personal data is inaccurate;
 - our processing of your personal data is unlawful ;

- where we no longer need the personal data but you require us to keep it to enable you to establish, exercise or defend a legal claim;
- where you have raised an objection to our use of your personal data;
- request a copy of certain personal data that you have provided to us in a commonly used electronic format. This right relates to personal data that you have provided to us that we need in order to take steps to enter into a contract with you and personal data where we are relying on consent to process your personal data;
- object to our processing of your personal data where we are relying on legitimate interests or exercise of a public interest task to make the processing lawful. If you raise an objection we will carry out an assessment to determine whether we have an overriding legitimate ground which entitles us to continue to process your personal data;
- not be subject to automated decisions which produce legal effects or which could have a similarly significant effect on you.

If you would like to exercise any of your rights or find out more, please contact gdpr@firstpointhealthcare.com. The **Error! Reference source not found.** at the end of this notice provides more detail about the information that we use, the legal basis that we rely on in each case and your rights.

Complaints

If you have any complaints about the way we use your personal data please contact gdpr@firstpointhealthcare.com who will try to resolve the issue. If we cannot resolve your complaint, you have the right to complain to the data protection authority in your country (the Information Commissioner in the UK).