



# Q-Close Recruitment Privacy Notice

This Privacy Notice is intended for recruitment candidates from UK.

This policy outlines how we will handle personal data and the rights of individuals in line with Data Protection Legislation. In the UK, Data Protection Legislation means the Data Protection Act 2018 ('DPA 2018'), United Kingdom General Data Protection Regulation ('UK GDPR'), the Privacy and Electronic Communications (EC Directive) Regulations 2003 ('PECR') and any legislation implemented in connection with the legislation mentioned above.

We take data protection and security seriously, and this policy focuses on our use of LinkedIn for recruitment purposes.

## Q-close is a Healthium brand

Healthium Medtech has established a reputation built over three decades for providing high quality precision medical devices and services to the NHS and other healthcare partners.

Q-close is operated by Healthium Medtech UK Limited. (Referred as "Q-close", "Healthium", "we", "our", "us" in this, Privacy Notice)

Healthium Medtech UK Limited is a private limited company registered in England and Wales under company number 06041206 and we have our registered office at, First Floor Spitalfields House, Stirling Way, Borehamwood, United Kingdom WD6 2FX.

We are registered with the Information Commissioner's Office (the ICO) with registration number ZB430988.

## Data Collection and Usage in Our Recruitment Process

Our recruitment process involves actively searching for potential candidates on platforms like LinkedIn. When we come across your profile and believe that you could be a great fit for our team, we may collect personal data such as your name, contact information, work history, and details regarding the industry, profession, and function in which you work. This information is collected for the purpose of evaluating your suitability for our open positions.

We may send you a message or an invitation to apply for one of our open roles. In this case, we collect additional data such as your responses to our messages and any other information you choose to share with us during the application process.

Additionally, if there is mutual interest, we might schedule a video call to provide you with more information about the role and our company. During this interaction, with your consent, we may collect personal data related to the video call, including video and audio recordings, and any information you provide during the conversation. The purpose of collecting this data is to further evaluate your qualifications and to facilitate the interview and selection process.

## Why are We allowed to Collect and Use Your Personal Information?

We only process your personal data when we have a lawful basis to do so:

### Matching Skills to Job Requirements

We rely on legitimate interests to assess your qualifications as it allows us to match your skills, experience, and education to the specific job requirements.

## Shortlisting Top Candidates

We rely on legitimate interests to evaluate your qualifications as this helps us shortlist the most promising candidates making the selection process more efficient.

## Feedback and Improvement:

We rely on legitimate interests to gather feedback on the application process, as it helps us identify areas for improvement and refine our communication strategies to make the recruitment process more transparent and informative for candidates.

## Recording Video and Audio

We may ask for your consent to record a conversation either audio, video, or both.

## Offering and Entering into a Contract

We also need to process your personal information to decide whether to enter into a contract of employment with you.

## Future Opportunities

We may ask for your consent to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that.

## How do We Contact You and Use of Your Information (LinkedIn)

Method	Purpose	Legitimate Interest	Data Handling
<b>Connection Request:</b>	Sending connection requests to LinkedIn members.	Establish a professional network and access publicly available LinkedIn information.	Requests are made within LinkedIn, and no data is typically exported to in-house systems.
<b>Inviting Individuals to Follow:</b>	Invite individuals to follow our company on LinkedIn.	Expand our network, increase visibility, and inform potential candidates about updates and job opportunities.	Interaction occurs within LinkedIn, and no data is typically exported to in-house systems.
<b>Direct Message:</b>	Send private messages to LinkedIn connections.	Maintain and further communication with candidates already connected.	Messages are exchanged within LinkedIn and typically not exported to in-house systems.
<b>Advertising Job Roles:</b>	Targeted approach to recruiting by displaying job opportunities.	Efficiently inform candidates about job openings and targeting those matching our criteria.	Job distribution is managed within LinkedIn; data is not typically exported to in-house systems during the advertising process. Data may be transferred if candidates respond or apply.
<b>InMail:</b>	InMail is a paid messaging feature for sending private messages to LinkedIn members not in our network.	To contact potential candidates for job opportunities and establish initial communication.	Messages are exchanged within LinkedIn and are typically not exported to in-house systems unless the recipient expresses interest.
<b>LinkedIn Recruiter</b>	Premium service for advanced recruiting capabilities.	Streamline and enhance recruiting by efficiently identifying, contacting, and managing potential candidates.	Data is managed within LinkedIn Recruiter, but candidate info may be transferred to in-house systems if they progress in the process.
<b>Other LinkedIn Platform Solutions</b>	Application tracking	Assess how many applicants have applied and their application status (e.g., new, reviewed, interviewed).	Data may be transferred to in-house systems if candidates respond or apply.

## Sharing Your Personal Information?

We will only share your personal information with the following organisations for the purposes of processing your application: Our parent company Healthium Medtech Ltd (India), recruitment agencies, our HR management and recruitment system and parties involved with pre-employment checks, e.g., VISA applications. All our third-party

service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

## How Long do We keep Your Personal Information?

We will retain your personal information for no longer than 12 months after we have communicated to you our decision about whether to appoint you. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention policy and relevant Data Protection Legislation.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a longer period. If we do not contact you in 24 months, we will delete the data. You have the right to withdraw your consent for processing for this purpose at any time. To withdraw your consent, please contact us as set out below.

## Where We store Your Personal Information and International Data Transfers

The personal data that we hold about you outside of the LinkedIn platform will be stored in the UK. In limited circumstances may also be transferred to or stored at a destination outside the UK.

If we transfer your data to third party service providers based outside the UK, we ensure a similar degree of protection is provided to the transfer by ensuring at least one of the following safeguards is implemented:

- we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the UK.
- where we use certain service providers, we may use specific contracts (known as Standard Contractual Clauses) approved by the UK Information Commissioners Office (ICO) which give personal data the same protection it has in the UK and Europe, as well as any additional security measures as required.

If you have any questions regards international transfers or wish to obtain a copy of any information related to the transfer of your personal data please contact us as set out below.

## What are Your Rights regarding Your Personal Information?

You have rights we need to make you aware of. You may have the right to:

- Ask us for copies of your personal information. There are some exceptions, which means you may not always receive all the information we process;
- Ask us to correct information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete;
- Ask us to delete your personal information;
- Ask us to restrict the processing of your information;
- Object to our processing of your personal information;
- Ask that we transfer information you have given us from one organisation to another, or to give it to you; and
- Complain to your local data protection authority.

### Automated Decision Making and Profiling

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

If you would like to exercise any of your rights, please contact us as set out below.

## Contact US

If you would like to exercise one of your rights as set out above, or you have a question or a complaint about this policy, the way your personal information is processed, please contact us by one of the following means:

First Floor Spitalfields House, Stirling Way, Borehamwood, United Kingdom WD6 2FX.

[info@qclose.com](mailto:info@qclose.com)

+44 (0) 20 8863 4168

We have appointed a Data Protection Officer (DPO) to help us monitor internal compliance, inform and advise on data protection obligations, and act as a point of contact for data subjects and supervisory authorities.