


Identifier:	Version:	Effective Date:	
	V.1	1/07/2024	
Original Date:			
Process Owner:	DATA PROTECTION OFFICER		
CHKS Requirement			
RECRUITMENT PRIVACY NOTICE			

DOCUMENT REVIEW

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RECRUITMENT PRIVACY NOTICE

1. ABOUT THIS NOTICE

C-Care is committed to protecting your privacy. We are required to comply with the laws and regulations that apply to the protection of your personal information. These are the Data Protection and Privacy Act, 2019 and the Data Protection and Privacy Regulations, 2021. As such, all C-Care entities are registered with the Personal Data Protection Office.

This notice explains what personal data (also herein referred to as personal information) we collect from you and how that information is used when you apply to work with us. This includes individuals applying for positions as a member of staff, (including full time, part-time, permanent, fixed term, interning or support staff), as well as contractors, suppliers, volunteers, and peripatetic staff.

This notice also applies to the information we collect about individuals (references) whom we contact in order to find out more about those who apply to work with us.

Please take time to read this Privacy Notice carefully and contact our Data Protection Officer if you have any questions about its content.

We will review this Privacy Notice periodically and we advise you to check back on our website for the latest version.

2. INFORMATION ABOUT US

C-Care is a private healthcare group based in Uganda, owning and operating three private healthcare facilities in Uganda, namely International Hospital Kampala (IHK), International Medical Centres (IMC), and International Medical Foundation (IMF). C-Care also owns and operates International Medical Group Pharmaceuticals (IMGP).

In order to assess your qualifications and suitability for the position you apply for, C-Care needs to collect and process information about you (personal data). This information is collected both in paper and electronic form. When collecting and processing this information, C-Care is regulated as the 'Data Controller' of the personal information provided. As the person whose data we collect and use, you are referred to as the 'Data Subject'.

3. WHAT PERSONAL INFORMATION DOES C-CARE COLLECT?

The personal information which you may submit through the 'WORK WITH C-CARE' page on our website, or the job application form includes, without limitation:

- Your name and contact details (i.e. address, phone number, email address)
- CV, résumé, cover letter, previous work experience/history including salary and allowance, education, transcripts.
- Employment preferences, desired salary, marital status and family information; results of your assessments.
- information relating to references.

Please note: If you intend to provide us with details of a reference or any other third party as part of your CV/resume, it is your responsibility to obtain consent from the third party prior to disclosing the third party's personal information to us.

4. WHERE DO WE GET YOUR INFORMATION FROM?

Most of the personal information provided to us is collected directly from you when you apply for a job through the 'WORK WITH C-CARE' page on our website, through a job application form and during the interview process. We may also gather information about you from the references you provide.

5. HOW WILL C-CARE USE YOUR PERSONAL INFORMATION?

We use information about you in the following ways:

- To assess your qualifications and suitability for a job.
- To conduct reference checks (if you are shortlisted).
- To schedule interviews (if you progress in the application process).
- To conduct background checks (if you are offered the position).
- With your consent, we may also contact you about other career opportunities.

Please note: If you are hired as an employee the information you submitted may become part of your employee file and used for employment purposes. We will provide a separate, detailed notice explaining how we handle employees' personal information.

6. HOW LONG DOES C-CARE RETAIN KEEP YOUR INFORMATION?

We retain your application information for the following periods:

- a) **For as long as the vacancy you applied for is available:** We keep your information for the duration of the recruitment process for the position you applied for (maximum one year) to ensure a fair evaluation of all candidates.
- b) **To consider you for future Opportunities:** We may be interested in keeping your information on file for future openings that match your qualifications. Before the one-year period ends, we will request your consent to store your information for this purpose. Granting consent allows us to consider you for future openings. If you do not provide consent, your information will only be retained for the duration of vacancy for the job you applied for.

In the event you are hired by C-Care, your personal information will be transferred to your employment file and will be processed for employment purposes.

7. HOW DO WE SAFEGAURD YOUR INFORMATION?

Information collected during the recruitment process will be held and kept by C-Care in our filing systems and servers. When we share your personal information with third parties involved in the recruitment process, we ensure they are contractually obligated to maintain appropriate data security measures to protect your information.

We have appropriate security measures in place to prevent personal information from being accidentally lost, used, or accessed in an unauthorised way. This includes personal information being locked in drawers and file cabinets under key and lock, password protected or encrypted.

We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

8. WHO DOES C-CARE SHARE MY INFORMATION WITH?

To ensure a fair and thorough recruitment process, we may share your personal information with the following parties:

Authorized C-Care personnel: This includes hiring managers, interviewers, and other individuals involved in evaluating candidates for the specific position you applied for.

Contracted service providers: We may work with recruitment agencies to assist with the process. These third parties will only be given access to the information necessary to perform their services and will be contractually obligated to protect your data privacy.

References: We will contact the references you provide in your application with your permission.

Regulatory bodies (for specific roles): If the position requires professional certification (e.g., medical professionals), we may be required to verify your qualifications with the relevant licensing or certification body.

Institutions of Higher Learning, Colleges of High Schools: For background checks to ascertain the validity of the documents provided.

We will only share your information with these parties for legitimate recruitment purposes and in accordance with the laws on data protection and privacy.

9. INTERNATIONAL TRANSFERS

In some cases, depending on the specific job you applied for, your personal information may be transferred to C-Care affiliates in other countries or to recruitment agencies located outside of Uganda. This will only occur if the role requires consideration by personnel in those locations who are involved in the hiring decision. We will only share the information necessary to assess your suitability for the position and make informed hiring decisions.

Safeguards for International Transfers:

C-Care is committed to protecting your data privacy. Whenever we transfer your information internationally, we will ensure it is done securely and in accordance with applicable data privacy laws. This may involve implementing safeguards such as:

- Data transfer agreements that incorporate strict security and data protection obligations equivalent to those required in Uganda.
- Acquiring your consent to transfer your personal information to another country before you submit your application.
- Transferring only the minimum information necessary for the hiring decision.

10. WHAT RIGHTS DO YOU HAVE REGARDING YOUR PERSONAL INFORMATION?

The law provides you with certain rights in relation to the personal information about you that we hold. You may exercise these at any time by contacting our Data Protection Officer (contact details below) or as otherwise noted below and without adversely affecting your application.

Right of Access

You have the right to request us to:

- confirm whether we hold your personal information.
- give a description of the personal information we hold on you; and
- provide the identity of a third party or a category of a third party who has or had access to such information.

This is known as a **Subject Access Request**. The information will be provided free of charge and, unless there are grounds for extending the statutory deadline, the information will be provided to you within thirty days of receipt of your request.

Please note that in order to process your request, we will need proof of your identity and may need further information from you in order to locate the information. Please note that in some cases we may not be able to fully comply with your request, such as when fulfilling your request will require us to disclose information related to another individual who may be identified from that information.

Please contact the Data Protection Officer (contact details below) should you wish to exercise this right.

Right to Rectification

We take reasonable steps to ensure the information we hold about you is both accurate and complete. However, you are entitled to have the information we have rectified to reflect the most accurate and complete representation of your personal data. Unless there are grounds for extending the statutory deadline, we will respond within one month of receipt of a rectification request.

Please contact the Data Protection Officer (contact details below) should you wish to exercise this right.

Right to Erasure (Sometimes Referred to as the Right to Be 'Forgotten')

In some circumstances, you have a right to have information about you 'erased'. This right applies where we no longer have the authority to retain the personal data in question and where the personal information we hold on you is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or obtained unlawfully.

We will inform you of our decision on whether or not to comply with the request within seven days of receiving it. If we choose to comply with it, please be aware that we will retain information in a register indicating; your name, type of data you've requested we delete, details of the request made, and the date we complied with it.

Please contact the Data Protection Officer (contact details below) should you wish to exercise this right.

Right to Prevent Processing

In some situations, you have the right to request us to stop processing your personal data. This right applies where the processing of your personal information causes or is likely to cause unwarranted substantial damage or distress to you, or where the processing of your personal data is not compatible with the purpose for which we collected it.

We will inform you of our decision on whether or not to comply with the request within fourteen days of receiving it.

Please note that this right is not absolute. It does not apply where we collected and are processing the information because we are authorized to do so by law, where it is required for the performance of our contract with you, where it is required for medical purposes and where it is required for compliance with a legal obligation we are subject to.

Please contact the Data Protection Officer (contact details below) should you wish to exercise this right.

Rights Relating to Automated Decision Making

You have the right not to be subject to a decision when it is based on automated processing (i.e. by a computer alone); and it produces a legal effect or a similarly significant effect on you.

Right to Withdraw Consent

You have the right to withdraw consent to us holding or using information about you, but only if consent is the basis for us holding or using your information. Please click the 'unsubscribe' button in emails informing you about other career opportunities.

Otherwise please contact the Data Protection Officer (contact details below) should you wish to exercise this right.

Right to Object

You have the right to object to C-Care holding or using information about you in certain situations. This includes where we need your consent for collecting and processing your personal data.

Please contact the Data Protection Officer (contact details below) should you wish to exercise this right.

11. HOW CAN YOU LODGE A COMPLAINT?

You can complain to the Personal Data Protection Office (PDPO) if you are unhappy with the way we have dealt with a request from you to exercise any of your rights or if you think we have not complied with our legal obligations under the Data Protection and Privacy Act, 2019.

Whilst you do not have to do so, we would appreciate you making the Data Protection Officer aware of the issue and giving us an opportunity to respond and address it before contacting the PDPO.

Making a complaint will not affect any other legal rights or remedies that you have. More information can be found on the PDPO's website: www.pdpo.go.ug. The PDPO can be contacted by post, phone, or email as follows:

Personal Data Protection Office
Plot 7A, Rotary Avenue,
Kampala
Uganda
Phone: +256 417 801 008
+256 417 801 009
+256 417 801 011
Email: info@pdpo.go.ug

12. WHERE TO GET FURTHER ADVICE: CONTACTING C-CARE & THE DATA PROTECTION OFFICER

For further questions or to exercise any rights set out in this Privacy Notice, please contact the C-Care Data Protection Officer by email at dataprotection@img.co.ug. Alternatively, you can write to:

Data Protection Officer
C-Care Uganda
Plot 4686 Barnabas Rd,
Kampala
Uganda

For independent advice, you may contact the Personal Data Protection Office through the email, telephone numbers and address indicated above.

13. UPDATE OF PRIVACY NOTICE

We routinely review and update this privacy notice. If you have opted in to receive email communications from us, we will notify you of any updates to this privacy notice via email. In any case, the most recent version of the notice will always be available on our website.

**** NOTICE TO BE PUT ON THE 'WORK WITH US' INSTANT APPLICATION PAGE****

[Checkbox] I confirm that I have read and understood the C-Care Recruitment Policy. ([Link to Recruitment Policy])

[Checkbox] I consent to C-Care collecting and processing my personal information for the purposes of assessing my suitability for the position I have applied for.

[Checkbox] I understand that C-Care may need to share my personal information with affiliates or third parties in other countries for the purposes of assessing my suitability. I consent to this international transfer of my data.

[Checkbox] I consent to C-Care keeping a record of my application for a period of one year to consider me for future job opportunities that align with my qualifications.

[Checkbox] I consent to the use of my personal information to contact me about future or other career opportunities than those to which I have applied.

**** NOTICE TO BE PUT IN APPLICATION FORMS*****

[Checkbox] I confirm that I have read and understood the C-Care Recruitment Policy. ([Link to Recruitment Policy])

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