

PRIVACY NOTICE POLICY

Symbios Health

Controlled Document

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Reference number	POL119
Version	2
Date ratified	19.09.25
Due for review	19.09.27
Review period	Two years unless a need for review has been identified
Committee/individual responsible	Company Director Symbios Health
Target audience	All Symbios Health staff
It is the responsibility of the Administration team to ensure this document is updated in a timely manner, controlled, and shared via teams.	
Uncontrolled Document if Copied or Printed	

Empowering Healthy Working

Implementation plan

Group	Objective	Method	Lead	Target Start	Target End	Resources
All employees	Employees to read, understand and follow this policy.	Policy available on SharePoint	Clinical Lead, Company Director	Sep 25	Oct 25	Employees to attend Teams meeting. Reference to SharePoint -clinicians – documents - policies

Amendments

Version	Amendments	Date
2	Section 7 : amended to include software updates and migration of records to new software.	08.09.25

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1. Introduction

Symbios Health Limited ("we," "us," or "our") is committed to protecting your privacy. This notice explains how we collect, use, and protect your personal data in accordance with the UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

2. Who We Are

Symbios Health Limited is a doctor-led occupational health provider offering a full range of services, including statutory medicals, new starter medical screening, management referrals, and health and wellbeing advice.

- In most of our occupational health services, we act as a "data controller," responsible for deciding how we hold and use your personal data.
- However, in respect of insurance medicals, we act as a "data processor" under the instruction of the insurance company. In these circumstances, we are covered under litigation privilege. Please see Section 12 for more information regarding Subject Access Requests (SARs) related to insurance medicals.
- The information collected, held, and used is in strict compliance with not only all current UK legislation, but also the confidentiality and ethical codes set out by the General Medical Council (GMC), Nursing and Midwifery Council (NMC), and the Faculty of Occupational Medicine (FOM).
- Contact Information:
 - Email: hello@symbios.health
 - Registered address: Plym House, Longbridge Road, Plymouth, PL6 8LT.
 - Phone: 0800 999 1824
 - ICO registration number: ZA837836

3. Data Collection

We collect personal data in the following ways:

- **Website:** When you use our website, including completing contact forms.
- **Occupational Health Services:** During consultations, medical assessments, and when maintaining your occupational health records.
- **Client Portal:** When clients register and use our online portal.

4. Types of Data We Collect

We may collect the following categories of personal data:

- **Personal Contact Information:** Name, address, telephone number, email address.
- **Identification:** Date of birth, gender.
- **Employment Information:** Job title, employment history, work location, benefits, performance information.
- **Personal and sensitive or Special Category Data:** Such as medical history, health records, sickness records, information about physical or mental health.

- **Portal User Data:** Client and employee names, contact details, email addresses.
- **Website Usage Data:** IP address, browser type, pages visited (collected via cookies).

5. Legal Basis for Processing

We process your personal data based on the following legal bases:

- **Contractual Necessity:** To provide occupational health services.
- **Legal Obligation:** To comply with legal requirements (e.g., statutory medicals).
- **Legitimate Interests:** We have a legitimate interest in certain data for the purposes of preventative or occupational health medicine.
- **Public Interest:** In rare cases, we may process data in the interest of public health.

6. Use of Your Information

We use your information to:

- Provide occupational health services.
- Manage client accounts and portal access.
- Respond to inquiries and requests.
- Comply with legal obligations.
- Improve our services.
- Maintain accurate medical records.
- Contact you regarding appointments or medical results.
- If you contact us to join the Symbios team we will use the data you provide purely for recruitment and future employment purposes. By sharing the information, you consent to us processing this under the data protection legislation.

7. Data Retention

We retain your personal data for as long as necessary for the purposes outlined in this notice, or as required by law. We typically retain occupational health data for 6 years after the end of employment, unless the data relates to health surveillance when we hold it for the timeframe stated in the relevant regulations (up to 50 years).

Symbios Health may occasionally need to update and migrate occupational health records to new, secure systems as part of our normal business operations. Any such migration will be conducted in full compliance with all relevant GDPR and data security processes. We will notify current employees via their employers, and we will make a public announcement on our website and social media channels in advance of any data migration. This will provide individuals with the opportunity to opt out.

8. Data Security

We implement appropriate technical and organizational measures to protect your personal data from unauthorized access, disclosure, alteration, and destruction. These measures include:

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- Secure servers and data storage.
- Encryption of sensitive data.
- Access controls and authentication.
- Regular security assessments.

9. Sharing Your Information

We may share your information with:

- Your employer, with your consent.*
- Healthcare professionals (with your consent).
- Instructing insurance companies under strict contractual agreements.
- Legal authorities (when required by law).
- We do not transfer data outside of the European Economic Area (EEA).

*If we consider there is a risk of serious harm or if we are required by law, we will share limited data about you with the appropriate bodies.

10. Your Rights

You have the following rights:

- **Access:** Request a copy of your personal data.
- **Rectification:** Correct inaccurate or incomplete data. Any factual inaccuracies will be amended/rectified promptly. This right does not however include an individual's right to have 'clinical opinions' amended; this remains the decision of the clinical author of the document.
- **Erasure:** Request deletion of your data (where applicable). However, there are exceptions to the right to be forgotten and in OH practice confidential records should as a general rule not be deleted at the request of a data subject because they fall within Article 9 (2)(h) of GDPR.
- **Restriction:** Limit the processing of your data.
- **Data Portability:** Receive your data in a portable format.
- **Object:** Object to the processing of your data.
- **Withdraw Consent:** Withdraw your consent at any time prior to releasing of report (for consent-based processing).
- **Right to complain:** You have the right to complain to the information commissioner's office.

11. Cookies

Our website uses cookies to enhance your browsing experience. Cookies are pieces of information that a website sends to your browser. We use Google Analytics to collect anonymous data about website usage. If you don't want us to collect any cookies, or control which cookies are collected, you can manage your cookie preferences through your browser settings.

12. Subject Access Requests (SARs)

General Occupational Health Records:

To request access to your occupational health records, please submit a written request to hello@symbios.health or by post to our address. Your request must include:

- Your full name and date of birth.
- Your current address.
- A clear description of the information you require.
- Your signature.

Insurance Assessments:

In the event that you decide to put in a Subject Access Request (SAR) specifically related to an insurance assessment, we will exercise our rights for litigation privilege as defined by the Information Commissioner's Office (ICO). This means we may not be able to provide you with additional information beyond what the insurer may provide.

If your personal information is discussed or included in confidential communications between ourselves and our legal advisors (including in-house legal teams), we are not obliged to give it to you as part of your request. This information is considered 'privileged', which means it should remain confidential between us and the legal team.

We will, however, always collaborate with the insurer. Should the insurer request our permission or guidance to release our reports or similar documentation, we will always advocate for the release and sharing of the data when we believe it is safe and appropriate to do so.

13. Changes to This Notice

We may update this privacy notice from time to time. We will notify you of any significant changes through making changes to this available Privacy Notice.

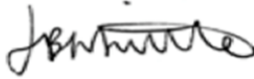
14. Contact Us

If you have any questions or concerns about this privacy notice, please contact us at hello@symbios.health or 0800 999 1824.

15. Linked Documentation

STR517 GDPR Documentation Controller
 STR519 GDPR Data Plan
 STR520 Data Flow Mapping
 STR516 Legitimate Interest Assessment - IT
 STR515 GDPR Data Inventory Storage and Retention
 SOP259 GDPR Information and Guidance
 FOR365 Data Protection Agreement for SLA
 FOR366 Data Processing Agreement for SLA
 FOR370 Data Protection Agreement for Ad Hocs
 FOR371 Data Processing Agreement for Ad Hocs
 FOR402 GDPR Data Audit
 RA10 GDPR Data Breach - Risk assessment

16. Review and Authorisation

REVIEWED BY and ROLE	SIGNATURE	DATE
Dr Jonathon Whittle OHP and Director		08.09.2025

AUTHORISED BY	SIGNATURE	DATE
Dr Oliver Cooper		19.09.25
Symbios Health Director Deborah Wassell		19.09.25
Head of Governance/ISO Lead		

17. Quality Impact Assessment/Employee

		Yes/No	Comments
1.	Does the policy/guidance affect one group less or more favourably than another on the basis of:		
	Race	No	
	Ethnic origins (including gypsies and travellers)	No	
	Nationality	No	
	Gender	No	
	Culture	No	
	Religion or belief	No	
	Sexual orientation including lesbian, gay and bisexual people	No	
	Age	No	
	Disability - learning disabilities, physical disability, sensory impairment, and mental health problems	No	
2.	Is there any evidence that some groups are affected differently?	No	
3.	If you have identified potential discrimination, are any exceptions valid, legal and/or justifiable?	n/a	
4.	Is the impact of the policy/guidance likely to be negative?	No	
5.	If so, can the impact be avoided?	n/a	
6.	What alternatives are there to achieving the policy/guidance without the impact?	n/a	
7.	Can we reduce the impact by taking different action?	n/a	