



Privacy & Cookie Policy

Document Owner:	Taylor Hillman
Approved By:	Isabelle Baker
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Version Control

Version	Date	Changes Made	Author
1.0	26/10/2024	Full Policy Review	Taylor Hillman
2.0	03/07/2025	Full Policy Review	Taylor Hillman

1 – Introduction

This Privacy Policy explains how Komplex Group Limited ('we', 'us', or 'our') collects, uses, shares, and protects personal information. It applies to all companies and brands operating under the Komplex Group umbrella.

We are committed to protecting the privacy and confidentiality of personal data in compliance with the UK General Data Protection Regulation (UK GDPR), Data Protection Act 2018, and all relevant healthcare regulatory obligations.

2 - What Data We Collect

We collect and process various types of personal and special category data, depending on how you engage with us. This may include:

- Identity data (e.g. full name, date of birth, gender)
- Contact details (e.g. address, email, phone number)
- Recruitment data (e.g. CVs, right-to-work documentation, interview records)
- Employment data (e.g. payroll, performance, DBS checks)
- Healthcare and safeguarding information (e.g. care plans, health records)
- Equality and diversity data
- Technical data (e.g. IP addresses, browser type, device ID)
- Communication records (e.g. website forms, emails, call logs)

A full data inventory is maintained internally and can be provided upon request.

3 - How We Collect Your Data

We collect data:

- Directly from you (e.g. forms, phone, email, care service)
- Via job applications through GoHire or similar platforms
- Through interactions with our website, systems, or IT platforms
- From public authorities, health professionals, or regulatory bodies
- Through monitoring of issued equipment in accordance with our Fair Usage Policy

4 - Lawful Basis for Processing

We rely on one or more of the following lawful bases:

- Consent (e.g. marketing communications)
- Contractual obligation (e.g. employment or care agreements)
- Legal obligation (e.g. safeguarding, employment law)
- Vital interests (e.g. emergencies)
- Public task (e.g. government-funded care)
- Legitimate interests (e.g. operations improvement, compliance)

Special category data is processed under Article 9(2)(b), (h), and (g) of the UK GDPR, where necessary for employment, social protection law, healthcare provision, and safeguarding.

5. How We Use Your Data

Your data may be used for:

- Delivering healthcare services
- Recruitment and HR management
- Payroll, pension, and benefits administration
- IT and system administration
- Quality monitoring and complaint handling
- Marketing
- Security, compliance, and legal obligations

Any other use necessary and relevant to your employment or care relationship with us.

6 - Who We Share Your Data With

We share your data where necessary to deliver our services, meet regulatory requirements, fulfil contractual obligations, and protect individuals' health and wellbeing. We may share data with:

- Internal teams across Komplex Group
- NHS, councils, social workers, GPs or government contacts
- Legal and regulatory authorities (e.g. CQC, Ofsted, ICO)
- Software providers under contract (see next section)
- Insurers, auditors, and external advisors

7 - Third Party Platforms and IT Infrastructure

We use a secure infrastructure and only work with vetted suppliers. Platforms include:

- Bitwarden – Password management
- GoHire – Applicant tracking
- Breathe – HR management
- Xero – Payroll and finance
- Care Planner & Nourish – Care management systems
- HaloPSA – CRM and marketing
- Zoho Campaigns – Email campaigns
- Exclaimer – Email signature management
- Metricool – Social media analytics
- Adobe Creative Suite & Envanto – Design tools
- Freshdesk – Ticket management

All systems are protected by encrypted access, and where possible, two-factor authentication (2FA) has been implemented.

8 - Data Security

We apply the following measures to protect your data:

- Encryption of all data in transit and at rest
- Two-factor authentication (2FA) where supported
- Password management
- Secure access controls on all issued equipment
- IT asset monitoring and remote lock/wipe capability
- Physical security and restricted access to offices
- Regular audits, staff training, and breach protocols

9 - Data Retention

Data is retained in accordance with our internal retention policy and legal obligations:

- Job applications: 1 year if not hired
- Employment records: 6 years post-employment
- Financial records: Minimum 6 years
- Safeguarding: Indefinitely or until the child's 75th birthday
- Right-to-work and DBS data: Duration of employment + limited retention after

Where other data has been collected, we will retain it only for as long as necessary to fulfil the purpose for which it was collected, or to comply with legal, contractual, or regulatory requirements.

After the retention period ends, data is securely deleted, destroyed, or anonymised in accordance with our Data Protection Policy.

We securely destroy or anonymise data after the retention period ends. If you require more information on when your data will be deleted, please contact us.

10 - Your Rights

Under data protection law, you have the right to:

- Request access to your data
- Request correction or erasure
- Object to or restrict processing
- Withdraw consent at any time
- Request portability of your data
- File a complaint with the Information Commissioner's Office (www.ico.org.uk)

To exercise any of these rights, contact us using the details at the bottom of this policy

11 - Cookies and Tracking Technologies

Our website uses cookies and similar technologies to enhance user experience, analyse performance, and support targeted advertising. These technologies help us recognise returning users, understand usage patterns, and deliver relevant content.

Types of cookies we may use include:

- Essential cookies (e.g. login and security)
- Performance cookies (e.g. device tracking)
- Analytics cookies (e.g. Google Analytics for usage statistics)
- Advertising cookies (e.g. Google ads)

We also use tools like web beacons and tracking pixels within our emails or site to monitor campaign engagement and page traffic. You may manage cookie settings via our on-site cookie banner or your browser controls.

12 - Cookie Preferences and Opt-Out

You can accept or reject cookies via our Cookie Consent Manager. You may also update your browser settings to block or delete cookies. Please note, disabling some cookies may affect the functionality of our website.

You can find more guidance on managing preferences through:

- Digital Advertising Alliance
- Your browser's help menu

13. Changes to This Policy

We may update this Privacy & Cookie Policy to reflect changes in legislation or our internal practices. Please check this regularly for updates.

14 - Contact Us

For any questions about this policy or your data, please contact:

 enquiries@komplexgroup.co.uk

 Komplex Group, St James House, Central Park, Hollinswood Road, Telford TF2 9TZ

