



PAM Group

People Asset Management Limited (PAM Group)

PAM Group- Privacy Policy (HP017)

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Document Change Control

Version	Date	Author	Approver	Change Detail
1 - 13	July 2024	Lisa Morley	CEO/DPO	Archived versions of previous Privacy Policies
13.1	18/02/2025	Pippa Boulton	DPO	Changing of template and more in depth of Policy authored
13.2	22/02/2025	Pippa Boulton	DPO	Additional sections added
13.3	13/03/2025	Pippa Boulton	DPO	Finalised for Publication
14.0	18/03/2025	Pippa Boulton	DPO	Slight amends to tidy up publicised Policy
15.0	28/05/2025	Pippa Boulton	DPO	Change of PAM registered address and sorting of tables.
15.1	17/06/2025	Pippa Boulton	DPO	Slight spelling amends.
15.2	12/11/2025	Pippa Boulton	DPO	Change of name for Contractor Egress to KnowBe4 and adding in Champion Health as a major Sub-contractor.
15.3	06/02/2026	Pippa Boulton	DPO	Updating subcontractors - removal of Raiys.
15.4	19/03/2026	Pippa Boulton	DPO	Additional information included in right of Access – Section 10.1
15.5	19/06/2026	Pippa Boulton	DPO	Additional Information in regard to AI added to Section 10. Data Protection Complaints added to Section12 in light of the DUAA legislation.

Policy Owner: Data Protection Team

Review Frequency: Annually, or a full policy review could be triggered after legislation changes, or significant changes in case law or guidance.

Next Scheduled **30/09/2026**

Full Review Due: 30/09/2026

Approved by: Pippa Boulton, Data Protection Officer

Distribution: External

For any queries regarding this policy, please contact the policy owner.

1. General statement

Welcome to People Asset Management Limited, also known as PAM Group ("we", "our", "us"). We are committed to protecting and respecting your privacy. This Privacy Policy explains how we collect, use, disclose, store, and safeguard your data when you use our services or interact with us in any other way.

“PAM Group” consist of a group of companies:

- People Asset Management Limited
- PAM Occupational Health Solutions Limited
- PAM Wellness Limited (formerly ToHealth Limited)
- Corporate Health Ireland (CHI) is a trading name of PAM Group. CHI is operated in Ireland as EHA Corporate Limited, Shelomar Occupational Medicine Ltd and EHA Limerick (these companies are wholly/majority owned subsidiaries of PAM Group), please refer to <https://chi.ie/privacy-policy/>

We provide specialist health services and products as follows:

- Occupational Health Medicals, Management Reports, and Drug & Alcohol Screening
- Health Screening Assessments
- Physiotherapy and Counselling Therapy
- Employee Assistance Programmes
- Health Products and Vaccines

This privacy policy is intended to inform you about the information we collect, hold, and use about you. This policy does not provide exhaustive detail and explanation. However, we do keep and maintain accurate and detailed records about how your information is used, this is called a Records of Processing Activities (ROPA), as set out in Article 30 of the UK GDPR.

2. Data we collect.

PAM Group employs specialist clinicians who provide advice and medical treatment. These include doctors, specialist nurses, physiotherapists, counsellors, psychologists, psychiatrists, nutritionists, physiologists, wellbeing advisors, legal advisors, and debt advisors.

We hold your employer’s occupational records; these are health and personal data records that are held for your safety and wellbeing at work. Authorised healthcare

professionals may only hold occupational health records as set out in the UK Data Protection Act (2018) s(204)¹.

Where we provide Occupational Health services and/or Employee Assistance Programme* (EAP) services, we hold information about our clients' employees which will include personal details, e.g. Name, Home address, Date of Birth, Sex at Birth, Job details and/or medical records. We need this information to be able to provide accurate advice to you but also information to your employer ensuring that work does not damage your health, and you are fit for the work you do.

All medical data is held securely and only accessed by PAM Group workers. Your Employer will have access to our system, and a specific hierarchy is in place that determines which managers have access to your profile. Occupational Health reports and medical records are kept separately within our system, and managers do not have access to your medical records.

***N.B.** Employee Assistance Programme confidential data about you is also held on our secure system but segregated from other records. This data is stored by PAM in order to provide this service to you and it is not shared with your employer. At the end of a contract with your employer, this data will be securely and confidentially deleted after 30 days of the contract end date.

3. How do we collect your data?

Most of the time, you will provide us with your personal data directly, or your data may be supplied by your organisation/business. Data is shared by your employer either in the form of a referral or email when booking an appointment for you. PAM will also collect data about you when you attend for assessment by completing a health questionnaire and through discussion with the health professional during either a face to face or telephone consultation. When collecting data about you in this way we will also obtain your consent to continue.

4. Why we collect your data.

We may collect information about you that has been directly provided by you as follows:

- You have made a complaint to us.
- You made an enquiry to us.
- You have applied for a vacancy with us.

¹ [Data Protection Act 2018](#)

- You have requested information from us.

We use your data held in the delivery of our services, such as:

1. We need personal data, e.g. name, address, and date of birth in order to identify and verify the correct person and in some cases where we need to communicate with your healthcare provider this is the standard identification used within the NHS.
2. We need your personal contact details e.g. telephone and email to assist us in communicating with you when booking appointments.
3. We will collect and will create medically confidential data so that our clinicians can provide professional advice based on your health fitness and wellbeing.
4. We operate a secure occupational health IT system which requires any user of our service, including employees referred or managers making referrals, to be registered as an employee within our system.
5. We may retain telephone recordings. This type of data is held for the training and monitoring of our colleagues. Any voice recording is destroyed after 30 days and does not form part of your medical records.

5. Processing of your data

When your health data² is processed for the purpose of delivering our services to you or on behalf of your employer PAM Group acts as a data controller. Your employer will also function as a separate data controller for personal data that they process in relation to their employees.

Your data is processed by PAM Group for the purposes of delivering or administering the services to you or our client. We will always process your personal data in accordance with Data Protection laws and this Privacy Policy.

Your data is held in an electronic format in the United Kingdom. If your employer is based in Ireland, then your data is stored in Ireland.

When your employer becomes a client of PAM Group the historical occupational health records held by the previous occupational health provider are normally transferred to PAM Group. You will have been consulted on this transfer by your employer. During the time that PAM Group provides your occupational health service, we will create and add our records to your occupational health file. If your employer leaves PAM Group your occupational health file will normally be transferred to your new occupational health

² Health data is bound by the duties of confidentiality and under the Guide to Professional Conduct and Ethics for Registered Medical Practitioners (Amended) (2024),,,,,, it cannot be disclosed without consent with some exceptions, such as a court order or under health and safety when the safety of yourself or others are at risk.

provider, and you should be consulted on that change at that time. PAM Group should not retain a copy of your records after your employer leaves us, unless a separate agreement has been made.

All health information is processed using our secure clinical systems, OHIO and Fit4jobs. We will process data using email internally within our business and to our clients (your employer). Processing via email will not include medical reports or clinical data this is only processed using our secure systems. Our colleagues may occasionally use Microsoft Teams chat or SMS platforms for informal communication these include Microsoft Teams Chat, WhatsApp, and SMS. Informal communications will not include any health information or personal identifying data. All informal communications using Microsoft Teams does not form part of any formal data processing.

6. Sharing data

Where we use Associates, or any subcontracted labour, they work using the same systems as our employees do and any data processed is held in our systems. We may share your data with:

- Service providers and partners who assist us in conducting our business, or services provided to you.
- Law enforcement or regulatory agencies if required by law.
- Other third parties, but with your consent.

We use the following subcontractors to provide our services to you:

KnowBe4 Email Security (formerly Egress) is used to process secure email for Prior Sight processing. To validate an employee's access to the KnowBe4 Email Security systems, users must first register on the KnowBe4 Email Security platform. Registration requires providing a name, email address, password, and telephone number.

If you already have a KnowBe4 Email Security account, you do not need to create a separate account for PAM. You have the right to request deletion of your KnowBe4 Email Security data. However, registration with KnowBe4 Email Security is required to use the Prior Sight processing service.

AWS (Amazon Web Services) – Our dedicated Amazon Web Services (AWS) infrastructure is managed and monitored using AWS security solutions, including threat detection, managed antivirus, automated OS updates, and scheduled backups (daily incremental and weekly full backups). Backups are securely stored offsite.

Champion Health (<https://www.championhealth.co.uk>) are used to provide a dedicated health and wellbeing app and platform which provides a personalised and

proactive solution for individuals to work through their mental, physical and financial wellbeing. The health data Champion Health collect comprises of lifestyle health related behaviours (nutritional / hydration intake, alcohol consumption, smoking, physical activity, sleep), physical health (Musculoskeletal conditions), Mental Health (stress, anxiety, depression). All data collected is provided to Champion Health by the data subject and through informed consent. No identifiable personal data is shared by Champion Health and PAM. Anonymised statistical data is provided to PAM to develop health and well-being. A Data Subject is entitled to request that any personal data held by Champion Health be deleted and can withdraw their consent to processing at any time.

Synlab www.synlab.co.uk are our medical laboratory partner used to assess diagnostic testing as part of our Drug and Alcohol Services.

TDL www.tdlpathology.com are used to process time sensitive blood samples.

Inuvi www.inuvi.com are our laboratory partner used to process blood results as part of our Health Screening service.

HSE Science and Research Centre www.hsl.gov.uk/about-us/location used for biological testing and monitoring to management risk, prevent illness and protect people at work.

7. Legal Basis for Processing your data.

We hold and process information in relation to the occupational health and wellbeing services we offer to clients and to our own employees. We therefore rely on the following legal bases for processing data as set out in the UK Data Protection Act (2018) and the Regulation (EU) 2016/679 (General Data Protection Regulation) (UK GDPR)³.

I. Data Protection Act – UK (2018) Schedule 1 Part 1 s(2)

“Health or social care purposes.

2 (1) This condition is met if the processing is necessary for health or social care purposes.

2 (2) In this paragraph “health or social care purposes” means the purposes of.

(a) Preventative or occupational medicine.....”

³ UK GDPR means the retained EU law version of the General Data Protection Regulation (EU) 2016/679, as incorporated into UK law under section 3 of the European Union (Withdrawal) Act 2018 and as defined in the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019, as amended, updated or replaced from time to time.

- II. **UK GDPR Article (6)(1)(b)** - Processing is necessary for the performance of a contract to which the data subject is party or to take steps at the request of the data subject prior to entering into a contract; And or
- III. **UK GDPR Article 9(2)(h)** - Processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems.
- IV. **UK GDPR Article 9(2)(i)** processing is necessary for reasons of public interest in public health.

8. Medical Records

PAM clinicians may require medical reports from your healthcare professionals e.g. GP or a specialist Consultant. If required PAM will always obtain your written consent before obtaining the report. Before you give your consent to allow PAM to obtain any report you will be advised of:

1. The reason the report is needed.
2. Your rights under the Access to Medical Reports Act (1988) (AMRA).
3. Your right to see a copy of the report (prior sight) being sent to PAM if you wish.
4. That PAM will send a report to your employer based on the medical report sent to us. It will not be the actual report that your Healthcare provider sends to us, unless you provide consent.
5. How you can see the report that PAM sends to your employer

Where PAM is required to send a report to your employer and the report is being written by an Occupational Health Physician (Doctor), you will have the opportunity to see the report before it is sent to your employer. Reports are only sent to employees via our secure email procedures. If the report being sent to your employer is written by an Occupational Health Advisor (Nurse) you can obtain a copy of the report from your manager.

9. Transfers of data

Your information will not be sent outside of your home territory as follows:

United Kingdom - Data collected, processed, and stored for our UK clients is held in UK data centres (AWS).

Ireland - Data collected, processed, and stored for our Ireland clients is held in data centres (AWS) in Dublin.

10. Your Rights

Below is a list of your rights in relation to the personal data we collect, process and store. To make an application for any of the below please contact us using sar@pamgroup.co.uk. All your rights will be considered within one calendar month of receipt but could be extended if your request is deemed complex.

10.1 The right to access your personal data.

You have the right to ask us for copies of your personal information. This right always applies. There are some exemptions, which means you may not always receive all the information we process.

We do ask that requests are put in writing to avoid any confidentiality breach when taking verbal instructions. This can be directly to our email address sar@pamgroup.co.uk or by completing our Webform at <https://pamgroup.co.uk/about-us/subject-access-requests>. Please note we may request further data from you in order to verify your identity.

As an organisation we conduct reasonable and proportionate searches and balance the importance of fulfilling a request, with the volume of information which needs searching and any difficulties in retrieving it.

Artificial Intelligence (AI) tools can be helpful in composing your request, but they can also introduce errors or create overly complex requests. AI can misrepresent legislation or miss state what you are actually entitled to. AI tools sometimes generate broad or excessive wording that goes beyond the information you're entitled to under the Right of Access. If this is the case, we may require further clarification because of inaccuracies or unnecessary complexity. This creates delays for both yourself as a requestor and our teams in responding with your personal data.

Call Recordings - If a call recording has been captured and requested as part of a right to access (also known as a Subject Access Request (SAR)) please note that this it is supplied solely for your personal use and for the purpose of exercising your data protection rights. It must not be shared, published, or otherwise disclosed to any third party unless required by law.

10.2 The right to rectify inaccurate data.

You have the right to ask us to rectify information you think is factually inaccurate. You also have the right to ask us to complete information you think is incomplete. Your request will be considered carefully, and we will explain the reasons if declining a request.

This right does not include your right to request "clinical opinions" to be amended, this remains the decision of the clinical author of the document. It is also the author's (clinician's) right to not include additional information if they feel it is not pertinent to their advice.

10.3 The right to have your data erased ⁴

You have the right to ask us to erase your personal information in certain circumstances.

10.4 The right to restrict the processing of your data ⁵

You have the right to ask us to restrict the processing of your information in certain circumstances.

10.5 The right to object to the processing of your data ⁶

You have the right to object to processing if we process your information because the process forms part of our legal basis of public task or is in our legitimate interests.

PAM Group do not process your data for these reasons, so objection of processing is therefore not applicable.

10.6 The right to data portability ⁷

This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another or give it to you. The right only applies if we are processing information based on your consent or in talks about entering into a contract and/or the processing is automated.

10.7 The right not to be subject to automated decision-making, including profiling.

PAM Group do not currently use automated decision-making or profiling to provide our services.

11. Data Retention

We will retain your personal data only for as long as is necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

We have highlighted some particular instances below:

Record Description	Retention Period
Telephone Voice Recordings	30 days
Employee Liability Claims	3 Years
Limitation Act Claims	6 Years
Industrial Disease Records	40 Years
Rail Workers Sentinel Medicals & Drug and Alcohol testing	10 years

⁴ [Your right to get your data deleted | ICO](#)

⁵ [Your right to limit how organisations use your data | ICO](#)

⁶ [The right to object to the use of your data | ICO](#)

⁷ [Your right to data portability | ICO](#)

12. Data Protection Complaints

The Data (Use and Access) Act 2025 (DUAA) is defined as primary legislation that amends the Data Protection Act 2018 and UK GDPR, introducing new obligations across data use, access, and governance in the United Kingdom. Section 103 inserts a new section 164A into the Data Protection Act 2018, creating a formal statutory complaints mechanism for the first time.

If you consider that PAM Group have infringed data protection legislation because of the way we have handled your personal information (or the personal information of someone you're acting on behalf of), you can complain to us by completing our Data Protection Complaint form [here](#), or by submitting your complaint by post.

We accept Data Protection Complaints verbally, but we would then follow up in writing so that we capture all detail to be able to assist you.

If you have any questions about this Privacy Policy, or our data practices, please contact our Data Protection Officer (DPO) - in the first instance:

PAM Group Limited, 9 Lakeside Drive, (Also Known as 820 Mandarin Court), Centre Park, Warrington, WA1 1GG.

Telephone: 01925 227000

Email: data.protection@pamgroup.co.uk

Website: <https://www.pamgroup.co.uk/>

You also have a right to complain directly to the Information Commissioner's Office (ICO), if you feel that PAM Group has not responded effectively to your complaint in the first instance.

Information Commissioners Office

Wycliffe House, Water Lane, Wilmslow, SK9 5AF

Telephone: 0303 123 1113

Website: <https://ico.org.uk/>

Definitions & Acronyms

Term	Definition
Access to Medical Reports Act (1988)	An Act to establish a right of access by individuals to reports relating to themselves provided by medical practitioners for employment or insurance purposes and to make provision for related matters.
Classification	UNMARKED / Tier 1 (Publicly available)
Data Subject	Means an individual who is the subject of personal data
DPO	Data Protection Officer
DUAA	Data (Use and Access) Act 2025
Fit4Jobs	PAM Group's employment health screening service.
Health data	Means medical history, clinical information including notes and assessment forms, reports and medical data obtained, collected, and processed (including for the avoidance of doubt the medical opinion and clinical assessment) by PAM in the provision of the Services.
ICO	Information Commissioner's Office
OHIO	<i>Occupational Health Information Online</i> – PAM Group's bespoke online platform for HR and managers to make referrals, make appointments, obtain reports, refer employees, and gain access to management information
Personal data	Any information relating to any person that can be used to identify them either directly or indirectly, such as their name, identification number, address, web browsing data or other factors specific to physical, psychological, genetic, mental, economic, cultural, or social identity of that person.
ROPA	Record of Processing activities as stated in Article 30 of the UK GDPR - Each data controller and, where applicable, the controller's representative, shall maintain a record of processing activities under its responsibility.
SMS	Is an acronym for Short Message Service and is the most common form of text messaging used today.
SOP	Standing Operating Procedure
Special Category Data	Information on racial or ethnic origins, political opinions, religious or philosophical beliefs, trade union membership, health, sex life and sexual orientation, and genetic or biometric data.
Subject Access Request (SAR)	Is an individual's right to access and receive a copy of their personal data, along with supplementary information.

Related Policies & References

Reference	Location
Data Protection Policy	Internal/SharePoint
Data Incident/Breach Management Policy	Internal/SharePoint
Information Security Policy	External and Internal/SharePoint
Consultation Policy	External and Internal/SharePoint
Records Management Policy	Internal/SharePoint
Subject Access Policy	Internal/SharePoint