

## **Global employee privacy notice – Learning and Development platform Bupa Campus**

This privacy notice explains what information we collect about our employees in connection with Bupa's learning and development enterprise-wide Bupa Campus offering, how we use it and how we protect it. It also gives you information about your rights.

### **Who this notice is for**

This privacy notice is for all Bupa employees and Bupa self-employed contingent workers who have access to Bupa Campus.

"Employees" are our permanent and temporary employees, bank and agency workers, and self-employed contractors, but do not include Association Members.

### **About us**

#### **Who we are**

When we say Bupa in this notice, we mean the Bupa business that employs you, the Bupa MU business that Bupa business is part of, and the Bupa Group parent company (The British United Provident Association Ltd).

The Bupa company that will process your information will be, in:

- **The UK**: The British United Provident Association Ltd, that can be contacted by email at [dataprotection@bupa.com](mailto:dataprotection@bupa.com) or by post at the following address: Bupa, Privacy Team, 1 Angel Court, City of London, EC2R 7HJ, United Kingdom
- **Spain**: The corresponding company of the Sanitas Group listed at [www.sanitas.es/rqpd](http://www.sanitas.es/rqpd), tab "Sanitas Group Companies" ('Sanitas'). You may contact Sanitas' Data Protection Officer ('DPO'), by email at [dpo@sanitas.es](mailto:dpo@sanitas.es) or at the postal address of Calle Ribera del Loira 52, 28042, Madrid, Spain, if you have any questions.
- **Poland**: The company within the LUX MED Group that you work for which you can find listed at this [link](#). You may contact the Data Protection Officer of LuxMed and their companies, by email at [daneosobowe@luxmed.pl](mailto:daneosobowe@luxmed.pl)
- **Chile**: The company within Bupa Chile that you work for listed at this [link](#). You may contact to the Data Protection Officer for Bupa Chile and by email at [privacidad@bupa.cl](mailto:privacidad@bupa.cl)
- **Brazil** - Care Plus Medicina Assistencial LTDA, Alameda Mamoré, nº 687, 12º andar, Alphaville, Barueri/SP, CEP: 06454-040. You may contact the Privacy Team at [privacidade@careplus.com.br](mailto:privacidade@careplus.com.br)
- **Australia** - Bupa ANZ Healthcare Holdings Pty Ltd
- **New Zealand** - Bupa ANZ Healthcare Holdings Pty Ltd
- **Hong Kong** - Bupa International Limited
- **China** - Bupa International Limited
- **Mexico** - Bupa Servicios de Evaluacion Medica
- **Guatemala** - Bupa Guatemala, Compania de Seguros,
- **Egypt** - Bupa Investments Limited
- **Ireland** - Oasis Healthcare Holdings Ireland Limited

### **Who processes your personal information?**

A data controller is the business that looks after your data and decides how it is used. Generally, your BU employing entity and the Bupa Group parent company will be the data controllers of your personal information.

## **How we collect your personal information**

We collect your personal information from:

Our systems:

- Personal information used to set up your account and give you access to the catalogue of learning courses available to you, is sourced from existing employee records held in Workday, Global Digital Identify, and/or other local People sources, depending on where you are based. This is done using Global Digital Identity (GDI) and Workday Prism via single API / Cornerstone Workday Connector.

You and your interactions with Bupa Campus:

- Personal information about you will also be collected through your interactions with the learning platform and engagement with learning contents;
- When you get in touch with us in relation to Bupa Campus by phone, email, Bupa Campus platform, or by post.

## **What personal information we collect**

We will collect the following types of personal data either from our own systems (e.g. Workday or your local People systems), as submitted by yourself or created by your interactions with the Bupa Campus platform:

- Employee information: first and last name, employee number, business email address; Market Unit, Business Unit and company you work for; country and region, location (place of work), function, job family and group family, job profile, job role/title, job grade, management level, role, employee status (e.g. permanent, temporary part-time, etc), line manager information, whether you have direct reports, hire date, employee termination date, language, National ID (Sanitas only), CPD Participant (UK only), IDC - Irish Dental Council (Ireland), GDC - General Dental council (UK), registration numbers for those that require them to practice
- User-added information and platform interactions: username, interests, likes, comments, recommended skills, profile picture and banner images (only if you decide to add them to your user profile), bio (if you decide to add it to your profile)
- Learning data: learning progress and completion, course certificates, in-person course booking and attendance information, learning recommendations
- System logs

## **How we use the personal information we collect**

We use your personal information to manage and deliver a range of learning solutions as part of digital learning experience platform (LXP) Bupa Campus, to allow for your professional and personal development. In particular, your personal data is used for the purposes listed in the table below.

When using your personal data in this way, we rely on our legitimate interests to manage our relationship with our employees and support their professional and personal development.

| Purpose | Personal data in scope | Legal basis |
|---------|------------------------|-------------|
|---------|------------------------|-------------|

|                                                                                                                                                                                                           |                                                                                                                                                                                |                                                                                                                                                                        |
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| <ul style="list-style-type: none"> <li>• Enable your onboarding and access to the Bupa Campus platform</li> <li>• Deliver learning content and experiences</li> </ul>                                     | <ul style="list-style-type: none"> <li>• Employee information</li> <li>• User information and platform interactions</li> <li>• Learning data</li> <li>• System logs</li> </ul> | <p>Legitimate interests</p> <p>We have a legitimate interest to manage our relationship with our employees and support their professional and personal development</p> |
| <ul style="list-style-type: none"> <li>• Manage your courses' bookings</li> <li>• Record your learning progress and certificates</li> </ul>                                                               | <ul style="list-style-type: none"> <li>• Employee information</li> <li>• User information and platform interactions</li> <li>• Learning data</li> <li>• System logs</li> </ul> | <p>Legitimate interests</p> <p>We have a legitimate interest to manage our relationship with our employees and support their professional and personal development</p> |
| <ul style="list-style-type: none"> <li>• Record and manage your preferences, comments, likes and accessible offering</li> </ul>                                                                           | <ul style="list-style-type: none"> <li>• Employee information</li> <li>• User information and platform interactions</li> <li>• Learning data</li> <li>• System logs</li> </ul> | <p>Legitimate interests</p> <p>We have a legitimate interest to manage our relationship with our employees and support their professional and personal development</p> |
| <ul style="list-style-type: none"> <li>• Deliver personalised learning content recommendations</li> </ul>                                                                                                 | <ul style="list-style-type: none"> <li>• Employee information</li> <li>• User information and platform interactions</li> <li>• Learning data</li> <li>• System logs</li> </ul> | <p>Legitimate interests</p> <p>We have a legitimate interest to manage our relationship with our employees and support their professional and personal development</p> |
| <ul style="list-style-type: none"> <li>• Communicate with you in relation to your learning and bookings</li> </ul>                                                                                        | <ul style="list-style-type: none"> <li>• Employee information</li> <li>• User information and platform interactions</li> <li>• Learning data</li> <li>• System logs</li> </ul> | <p>Legitimate interests</p> <p>We have a legitimate interest to manage our relationship with our employees and support their professional and personal development</p> |
| <ul style="list-style-type: none"> <li>• Generate reports and aggregated insights, including into courses uptake and completion, platform use, most and least completions, attendance data for</li> </ul> | <ul style="list-style-type: none"> <li>• Employee information</li> <li>• Learning data</li> <li>• System logs</li> </ul>                                                       | <p>Legitimate interests</p> <p>We have a legitimate interest to understand the effectiveness of the programmes and their impact on upskilling our workforce</p>        |

|                         |  |  |
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| sessions and programmes |  |  |
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## Collecting and sharing your personal information

Generally, your personal information will be handled by the company you have a relationship with and the MU company, and aggregated reports will be handled by Bupa Group.

As part of the management of the platform, and to provide support, the platform suppliers will have access to all data stored.

## Transferring your personal information abroad

To deliver the digital platform, we use a supplier called Cornerstone, based in the UK. Your data is stored in the EU, but the supplier may transfer your data outside of the UK and EU when engaging their approved sub-processors and affiliates. We also use a virtual classroom software solution provided by a supplier called Kaltura, to deliver remote courses and classes, which may transfer your personal data outside of the UK and EU in accordance with their privacy [notice](#), and we may use other suppliers providing dedicated software to host specific courses from time to time.

We work with partner companies and service providers (such as other Bupa companies and IT providers) that operate in or from various countries worldwide. We ensure that these organisations and individuals comply with our security standards and are bound by contractual obligations for non-disclosure and data protection. Consequently, we cannot restrict the processing of an individual's personal data to the country of their residence. Regardless of where our processing occurs, we take steps to ensure that when your personal information is transferred to another country, it is protected in accordance with global data protection laws.

## How long we keep your information for

In general, we will keep your information for **7 years** after the date you leave your employment. However, there may be circumstances that mean we must keep your personal information for longer.

Retention periods depend on several factors:

- Whether you are currently employed by us.
- How long it is reasonable to keep records to show we have met the obligations we have to you and by law.
- Any periods for keeping information which are set by law or recommended by regulators, professional bodies or associations.
- Any time limits for making a claim.
- Any tribunal, court or other relevant proceedings that apply.

## Cookies, AI, analytics, and profiling

Bupa Campus uses cookies in line with Cornerstone's [cookie notice](#) and Kaltura's [cookie notice](#).

Bupa Campus digital platform also uses profiling and machine learning to provide you with recommended courses and contents. Learning content recommendations are not used or part of any evaluation or scoring or to determine what access a user can have to courses; instead, they are purely provided in the interest of self-development.

## Your choices and rights

You have rights under privacy law about to your personal information.

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| Right of access                                         | You can request a copy of the personal information we hold about you.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Right to rectification                                  | You can ask us to correct or remove inaccurate information we hold about you.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Right to restriction of processing                      | You can ask us to use your information for restricted purposes only.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Right to portability                                    | You can request that we transfer your information to you or to someone else in a format that can be read by computer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Right to erasure                                        | You can ask us to delete your information if there is no good reason for us to keep it. We may have a legal obligation or need to keep it for an overriding reason; in these cases, we won't be able to meet your request. We'll tell you if this applies when you make your request.                                                                                                                                                                                                                                                                                                                                                                                              |
| Right to withdraw consent                               | We do not normally rely on permission to allow us to process your personal information. We will only ask for your permission in very limited circumstances and, if we do so, we will make it obvious to you when we are asking for permission and what it is for. You can withdraw any permissions or consent you've given us. We'll let you know if we have to stop certain activities as a result. Even if you exercise this right, the way we used your information previously will remain lawful.                                                                                                                                                                              |
| Right to object                                         | <p>You can object to us processing your information in these scenarios:</p> <ul style="list-style-type: none"> <li>• we are processing it for a legitimate interest</li> <li>• our processing is based on a task carried out in the public interest</li> </ul> <p>However, we may not be able to comply with your objection if there is an overriding reason or the processing is necessary for legal claims. We'll tell you if this applies when you <u>contact us</u>.</p> <p>In other scenarios, you don't always have the right to object. We'll let you know if this is the case and our reasons for turning down your objection.</p>                                         |
| Rights in relation to profiling and automated decisions | <p>You can <u>ask us</u> not to make solely <u>automated decisions about you or use profiling</u> where this has a legal or similarly significant effect on you.</p> <p>You can also ask us to reconsider an automated decision and find out more how the decision was made. In this case, we'll consider whether our team can review the decision and let you know the outcome.</p> <p>We may not be able to comply with your request if:</p> <ul style="list-style-type: none"> <li>• the automated decision making or profiling is necessary for us to enter into a contract</li> <li>• we're authorised by law to make an automated decision or undertake profiling</li> </ul> |

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| <p>You also have a right to make a complaint to your local privacy supervisory authority</p> | <p>Please <u>tell us first</u>, so we have a chance to address your concerns.</p> <p>If we fail in this, you can address your complaint to</p> <ul style="list-style-type: none"> <li>– the <u>Information Commissioner's Officer</u>, if you are based in the UK,</li> <li>– the <u>Data Protection Commissioner</u>, if you're based in Ireland</li> <li>– the <u>Office of the Australian Information Commissioner</u>, if you're based in Australia</li> <li>– the <u>Privacy Commissioner</u>, if you're based in New Zealand</li> <li>– the <u>Agencia Española de Protección de Datos</u>, if you're based in Spain</li> <li>– the <u>Autoridade Nacional de Proteção de Dados</u>, if you're based in Brazil</li> <li>– the <u>Kişisel Verileri Koruma Kurumu</u>, if you're based in Turkey</li> <li>– the <u>supervisory authority of your country</u>, if you are an employee outside of the UK, or</li> <li>– if you are in an alternative jurisdiction, we will let you know your relevant authority during our communications.</li> </ul> |
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## How to exercise your rights, make a complaint or get in touch

If you want to exercise your rights, have any questions, comments or complaints about this notice, or any other concerns about the way in which we process information about you, you can get in touch with our Data Protection Officer and Privacy Team at:

- Spain: Sanitas' Data Protection Officer ('DPO'), by email at [dpo@sanitas.es](mailto:dpo@sanitas.es) or at the postal address of Calle Ribera del Loira 52, 28042, Madrid, Spain.
- Poland: the Data Protection Officer of LuxMed and their companies, by email at [daneosobowe@luxmed.pl](mailto:daneosobowe@luxmed.pl)
- Chile: the Data Protection Officer for Bupa Chile and by email at [privacidad@bupa.cl](mailto:privacidad@bupa.cl)
- For BGIUK and rest of the world: [dataprotection@bupa.com](mailto:dataprotection@bupa.com) or [ukpeopleoperationsteam@bupa.com](mailto:ukpeopleoperationsteam@bupa.com) or by post at the following address: Bupa, Privacy Team, 1 Angel Court, City of London, EC2R 7HJ, United Kingdom. To help us manage your request, please tell us in your email which Bupa business you are employed by, so that your request can be directed to the right BU team.