

Privacy Notice

MedicsPro Ltd ("We") are committed to protecting and respecting your privacy.

Our Group means our subsidiaries, our ultimate holding company - Urban Recruitment Group - and our associated companies as defined in section 1159 of the UK Companies Act 2006 (our Group).

This notice applies to the personal data of our website visitors, candidates, clients, suppliers and other people we may contact to find more about our candidates, such as emergency contacts or referees and sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) is a new regulation which replaces the Data Protection Regulation (Directive 95/46/EC) The Regulation aims to harmonise data protection legislation across EU member states, enhancing privacy rights for individuals and providing a strict framework within which commercial organisations can legally operate.

Even though the UK has expressed its intention to leave the EU in March 2019, the GDPR will be applicable in the UK from 25th May 2018. The Government intends for the GDPR to continue in UK law post Brexit and has also introduced a Data Protection Bill to replace the current Data Protection Act in due course.

Your new rights under the GDPR are set out in this notice but will only apply once the GDPR becomes law on 25th May 2018.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

By providing us with your data, you warrant to us that you are over 13 years of age.

For the purposes of data protection legislation in force from the 25th of May 2018 the data controller is MedicsPro of Jubilee House, 111-115 North St, Romford, RM1 1ES.

Our Data Protection Officers can be contacted at dataprotection@urbanrec.co.uk

1. Who we are and what we do

We are a recruitment agency and recruitment business as defined in the Employment Agencies and Employment Businesses Regulations 2003. We collect personal data from the following

types of people to allow us to undertake our business;

- Prospective and placed candidates for permanent or temporary roles;
- Prospective and live client contacts;
- Supplier contacts to support our services;

- Employees, consultants, temporary workers
- Prospective and placed candidates' professional referees.
- Prospective and placed candidates' emergency contacts.

We collect this information about you to carry out our core business and in order to provide recruitment services to you.

2. How do we collect your personal data?

Candidates:

Information you give to us

This is information about you that you give us by filling in forms on our site www.medicapro.com, by leaving a hard copy of your CV in one of our offices or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register to use our site, to enter our database, subscribe to our services, attend our events, participate in social media functions on our site, enter a competition, promotion or survey, and when you report a problem with our site.

The information you give us, or we collect about you, to offer you the best possible work opportunities tailored to your needs and preferences, may include your name, address, private and corporate e-mail address and phone number, emergency contact details, financial information, compliance documentation, including details of any criminal convictions (in accordance to our framework auditing obligations, we need to hold an enhanced DBS for all our candidates that will remain on file and updated for the duration of your registration with MedicsPro), references verifying your qualifications and experience, immigration status, curriculum vitae, nationality, photo ID evidence, Occupational Health and Immunisation records (required for all vacancies in the healthcare sector), photographs and links to your professional profiles available in the public domain e.g. LinkedIn, Twitter, business Facebook or corporate website.

Information we collect about you when you visit our website.

In each of your visits to our site we will automatically collect Technical Data about your equipment including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, if applicable, browser type and version, operating system and platform, information about your visit- including URL- products you viewed or searched for, usage patterns, and any phone number used to call our customer service number.

Information we obtain from other sources.

This is information we obtain about you from other sources such as LinkedIn, corporate websites, job board websites, online CV libraries, your business card, personal recommendations, clients,

referees, recommendation or Umbrella Companies. Please note this list is not exhaustive.

When we have obtained your personal data from third parties it is our policy to advise you of the source when we first communicate with you.

We work closely with third parties including companies within our Group - Urban Recruitment Group -, business partners, suppliers, analytics providers, search information providers, etc;. We may receive information about you from them for the purposes of our recruitment services and support services.

Clients

We obtain information such as name, email address, telephone number and other details you may provide us with to ensure we can offer you the best staffing service possible for your organisation. This information may come directly from you- when you proactively contact us or when we contact you (normally through our Business Development Department).

We can also obtain details from you from other sources including market research and, to the extent you use our website or click on an email from us, we will automatically collect technical information.

Suppliers

We obtain your data in the course of our professional relationship with you and this may include name, email address, telephone number, postal address and financial details.

We can also obtain details from you from other sources including market research and, to the extent you use our website or click on an email from us, we will automatically collect technical information.

3. Purposes of the processing and the legal basis for the processing

The core service we offer as a Recruitment company is the introduction of candidates to our clients for the purpose of temporary or permanent engagements. However, our service expands to supporting individuals throughout their career and to supporting businesses' resourcing needs and strategies.

We will only use your data when legally permitted:

- To carry out our obligations arising from any contracts we intend entering into or have entered into, between you and MedicsPro and to provide you with the information, products and services that you have requested from us or we think will be of interest to you because it is relevant to your career.

- To provide you with information about other goods and services we offer that are similar to those that you have already purchased, have been provided with have or enquired about. e.g: job offers of the same, or similar nature to that you have previously been interested in or have applied for)

- To monitor our compliance with our Equal Opportunities Policy and other legal or regulatory obligations.

Our legal basis for the processing of personal data is our legitimate business interest, described in more detail below, although we will also rely on contract, legal obligation and consent for specific uses of data.

Our Legitimate Business Interests

Our legitimate interests in collecting, processing and retaining your personal data is described below:

As a recruitment business and recruitment agency we introduce candidates to clients for permanent employment or temporary worker placements. The exchange of our candidates personal data and our client contacts is a fundamental, essential part of this process and it is also vital to comply with our internal and external compliance obligations.

In order to support our candidates' career aspirations and our clients' resourcing needs we require a database of candidates and clients' personal data containing historical information as well as clients' current resourcing requirements.

To maintain, expand, develop and function as a profit-making business we need to record the personal data of prospective candidates and client contacts.

To facilitate the receipt of services, we need to hold and store details of our suppliers, including financial information, so that we can pay for those services.

We do not believe any of our activities prejudices the individual in any way and they are in fact helpful to provide a more tailored customer/user experience to candidates, clients and suppliers.

If you are a candidate looking for employment or have submitted your details to a job board, we think it is reasonable for you to expect that we collect and use your data to offer and provide recruitment services, within your area of speciality and that you are happy for us to do so.

Under GDPR, you have the right to object to the processing of your data, where you feel this processing is not within the reasonable expectations you had envisaged or where you feel this is not aligned to the purpose for which they were originally collected.

Reasons for requesting this could be (list not exhaustive):

- Data is not strictly necessary for fraud prevention
- To ensure network and information security (e.g. prevent cyber-attacks)

To do so, please contact dataprotection@urbanrec.co.uk.

Consent

We will not generally rely on consent as a legal basis for processing your data, other than in relation to send you marketing communications by text or email, in accordance to PECR regulations. Should we want or need to rely on consent to lawfully process your data we will request your consent orally, by email or by an online process for the specific activity where we require consent and record your response on our CRM system. Where consent is the lawful basis for our processing, you have the right to withdraw your consent to this particular processing at any time by contacting marketing@urbanrec.co.uk or using the "Unsubscribe" option that you will find within our email communications.

Other uses we will make of your data:

- to facilitate the use of our website;
- to notify you regarding any changes to our service;
- to ensure that content from our site is presented in the most effective manner for you and for your computer.

We will use this information:

- To administer our site and for internal operations, including troubleshooting, data analysis, testing, audit, statistical and survey purposes;
- To improve our website to ensure that content is presented in the most effective manner for you and for your computer;
- To allow you to participate in interactive features of our service, when you choose to do so; as part of our efforts to keep our website safe and secure;
- To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- To make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

We do/do not undertake automated decision making or profiling. We do use our computer systems to search and identify personal data in accordance with parameters set by a person. A person will always be involved in the decision-making process.

4. Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and allows us to improve our website. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Notice.

5. Disclosure of your information inside and outside of the EEA

Where appropriate, and in line with local laws and requirements, we will share your personal information with:

Any member of our group who operate within in the EEA

Selected third parties including:

- Clients and potential employers: for the purpose of introducing candidates to them and increase candidates' chances to find suitable employment opportunities;
- Candidates: for the purpose of arranging interviews and engagements with potential employers;
- Clients, business partners, suppliers and sub-contractors: for the performance and compliance obligations of any contract we enter into with them or you;
- Advertisers and Marketing Technology networks that require the data to select relevant adverts to you (We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users).
- Analytics and search engine providers who will assist us in delivering improvements and optimisation of our website;
- Compliance partners and other suppliers who we have retained to provide services such as - Disclosure & Barring Service ((DBS) also known as criminal convictions checks) and occupational health checks, to the extent these checks are appropriate, for the purpose of assessing your suitability for a role where this is a condition of us entering into a contract with you or we have legal obligations to do so.

We will disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- MedicsPro or substantially all of MedicsPro assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms and conditions of supply of services and other agreements; or to protect the rights, property, or safety of MedicsPro customers, or others. - This includes exchanging information with other companies and organisations for the purposes of fraud protection, cyber security or credit risk reduction.

The lawful basis for the third- party processing will include:

- Their own legitimate business interests in processing your personal data, in most cases to fulfil their internal resourcing needs;
- Satisfaction of their contractual obligations to us as our data processor;
- For the purpose of a contract in place, or in contemplation;
- To fulfil their legal obligations

6. Where we store and process your personal data / Where do we transfer data

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may be transferred to third parties outside of the EEA in the course of our recruitment services and only for the purpose or purposes that it was initially collected. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. This includes staff engaged in, among other things, our recruitment services and the provision of support services (such as IT or Payroll Services). By submitting your personal data, you agree to this transfer, storing or processing. MedicsPro will take all steps reasonably

necessary to ensure that your data is managed securely and in accordance with this privacy notice.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted and details of your credit card will not be stored. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share your passwords with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will use our best endeavours to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to prevent unauthorised access.

7. Retention of your data

We understand our legal duty to retain accurate data and only retain personal data for as long as we need it and for our legitimate business interests, contractual obligations and legal obligations. Accordingly, we have a Data Retention Policy and run data routines to remove data that we no longer have a legitimate business interest, or other lawful basis for processing, in maintaining.

We carry out the following to try to ensure our data is accurate:

- Our website enables you to manage your data and to review whether the details we hold about you are accurate
- Prior to making an introduction we check that we have accurate information about you we keep in touch with you, so you can let us know of changes to your personal data

We segregate our data so that we keep different types of data for different time periods. The criteria we use to determine whether we should retain your personal data includes:

- The nature of the personal data;
- Its perceived accuracy;
- Our legal obligations;
- Whether an interview or placement has been arranged; and
- Our recruitment expertise and knowledge of the industry by country, sector and job role.

We may archive part or all of your personal data or retain it on our financial systems only, deleting all or part of it from our main database (CRM) system. We may pseudonymise parts of your data, particularly following a request for suppression or deletion of your data, to ensure that we do not re-enter your personal data on to our database, unless requested to do so.

For your information, Pseudonymised Data is created by taking identifying fields within a database and replacing them with artificial identifiers, or pseudonyms.

8. Your rights

The GDPR provides you with the following rights. To:

- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party in certain formats, if practicable.
- Make a complaint to a supervisory body which in the United Kingdom is the Information Commissioner's Office. The ICO can be contacted through this link: <https://ico.org.uk/concerns/>

9. Access to information

The Data Protection Act 1998 and the GDPR give you the right to access information held about you. We also encourage you to contact us to ensure your data is accurate and complete. Your right of access can be exercised in accordance with the Act (and the GDPR once it is in force). Prior to 25th May 2018 any access request under the Data Protection Act will be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

A subject access request should be submitted to dataprotection@urbanrec.co.uk No fee will apply once the GDPR comes into force.

10. Changes to our privacy notice

Any changes we make to our privacy notice in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy notice.

11. Contact

Questions, comments and requests regarding this privacy notice are welcomed and should be addressed to dataprotection@urbanrec.co.uk

Account Removal

You can remove your account and all your data from our system, simply login and click here