

MedicsPro Privacy Notice

Let us tell you about us

We are MedicsPro, a healthcare recruitment business that has been operating in the UK for over 10 years.

We are located in Romford, East London, and we pride ourselves in respecting the privacy of your data and treating all the information we hold about you with the utmost care, ensuring your data is only processed for the purposes it was collected for.

In this notice, we want to let you know a few important things about why and how we collect your data, how it is used and the rights you have in relation to it.

We are responsible for your personal data and subject to all applicable data protection laws in the UK, which include the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) and the Data Protection Act 2018.

Please, read this notice carefully and, if you ever feel something is not clear or you would like more information or exercising any of your rights, we will welcome your feedback.

You can contact us at:

Email: dataprotection@medicspro.com

Post:

MedicsPro Ltd

111-115 North Street, Romford- RM1 1ES

Phone:

0208 505 6600

We also have a nominated Data Protection Officer (DPO) who ensures your data is being kept safe and in compliance with all relevant laws and regulations. Her name is Amanda Closier, and she can help in case you have any queries.

Why we collect data

As mentioned before, as a healthcare recruitment business, our core activity is matching the right healthcare candidates with the right jobs in the NHS or the private sector. In order to do that, we need to collect information from:

• Prospective and placed candidates/applicants for permanent or temporary roles



- Suppliers, contractors and providers to support our services.
- Prospective and live clients.
- Our own staff and consultants.
- Candidates' professional referees.
- Candidates' emergency contacts (Next of Kin)

If you are a CANDIDATE or you have secured a role with us, this section applies to you.

Whether you have sent us a speculative CV, applied to one of our advertised roles, through our website or social media, or you have registered with us in the past, for the purpose of this notice, you are one of our candidates and here you can find information about the details we may hold about you:

Identity and Contact Information:

- Name (inc. name changes and maiden names)
- Address
- Phone number
- Date of birth (Age)
- Photograph/s
- Gender
- Nationality
- Right to work status
- Copies of ID Documents/ Photo ID Cards.

Career (Educational and Professional):

- Full CV
- Details of previous employers
- Educational Degrees/ Qualification diplomas/ Training history
- Job title
- Professional registration
- Aspirations about prospective jobs
- Salary details from past employments
- Hobbies
- Referee details
- Professional titles

Financial Information:

- Social Security number or identifiers
- Tax status
- Bank account details



- Ltd Company details
- P45/ P60
- Umbrella Company details
- Financial statements/ Utility bills

Criminal Records Data:

- Disclosure and Barring Service certificates
- Statements/ Client risk assessments about cautions and convictions
- Disclosure and Barring Service Update Service checks

Special Category Data:

- Immunisation records
- Medical questionnaires
- Occupational health clearance and recommendations in relation to your job
- Fitness to work certificates
- Ethnic origin (for equality and diversity monitoring purposes)
- Sexual orientation (for equality and diversity monitoring purposes)
- Religion/ beliefs (for equality and diversity monitoring purposes)

Data collected automatically/ IT identifiers:

- IP address
- History of access to our website and app
- Email trails of communications with us

This information is collected in different ways:

- Information and documents that you give to us (for example, when you send us your CV, fill a registration form, subscribe to our services...)
- Information we obtain from other sources (for example, your LinkedIn profile, job boards you are registered with, references and recommendations...)
- Information or identifiers automatically collected (for example, when you visit your website, download our app...)

All this information you give to us, or we collect about you, is used for the purpose to offer you the best possible job opportunities, tailored to your needs and preferences.

We will only use your data when legally permitted. For example:

-To carry out our obligations arising from any contracts we intend to entering to or have entered between you and us and to provide you with the information, products and services that you request 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, been provided with or enquired about. (E.g.: job offers of the same or similar nature of one you have previously been interested in or applied for)

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

- For audits and third-party scrutiny as part of our legal and contractual obligations as a healthcare staff provider to the NHS and private healthcare sector organisations.

Our legal basis for the processing of your 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.

If you are one of our CLIENTS, this section applies to you.

To ensure that we can be an efficient staffing service provider to you, we need to collect a minimum amount of data that will be obtained in different ways. Depending on the engagement you have had with MedicsPro in the past and the nature of the service or business you operate in, the amount of data needed will vary, and so will our legal basis to process it. However, as a minimum, we will collect:

Identity and Contact Information:

- Name of contacts within your organisation (Client Key Contacts)
- Job titles of your key contacts
- Email addresses
- Phone numbers

Data collected automatically/ IT identifiers:

- IP address
- History of access to our website and app
- Email trails of communications with us

This information may come directly from you (for example, when you proactively contact us over the phone or via email), from others (for example, when our candidates give us



feedback about your service or we do market research) or be collected automatically (for example, when you visit our website)

Our legal basis for the processing of your 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.

If you are one of our SUPPLIERS, this section applies to you.

We obtain your information during our professional relationship with you. Depending on the engagement you have had with MedicsPro in the past and the nature of the service or business you operate in, the amount of data needed will vary, and so will our legal basis to process it. However, as a minimum, we will collect:

Identity and Contact Information:

- Name of contacts within your organisation (Supplier Key Contacts)
- Job titles of your key contacts
- Email addresses
- Phone numbers

Financial Information:

• Bank details (sole traders)

Data collected automatically/ IT identifiers:

- IP address
- History of access to our website and app
- Email trails of communications with us
- Cookies

This information may come directly from you (for example, when you proactively contact us over the phone or via email), from others (for example, when we do market research or information is available in the public domain) or be collected automatically (for example, when you visit our website)

A few things about our legal basis for processing your information.

As a recruitment business, the exchange of personal data of our candidates 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' professional aspirations and our clients' resourcing needs we require a database of candidates and clients' personal data containing historical information as well as current resourcing requirements.

To operate and function as a profit-making business we need to record the personal data of candidates, clients, suppliers, contractors and providers.

We have balanced our legitimate business interest with your rights as a data subject and we do not think any of our activities prejudices or causes you harm in any way. They are in fact helpful to provide a more tailored and satisfactory service to all.

If you are a candidate looking for employment or have submitted your details to a job board, we think it is within your reasonable expectations that we collect and otherwise use your data to offer and provide recruitment services to you within your scope 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 or where you feel this is not aligned to the purpose for which your details were originally collected.

For some uses of your data, we rely on different legal basis for processing, such as contract, legal obligations and consent.

<u>Consent</u>

Generally, we will not rely on consent as a legal basis for processing your data, other than to send you marketing communications that we think may be of interest to you by text or email, in accordance with privacy and Electronic Communications Regulations (PECR).

If we need to rely on consent to process your data, we will request your consent either orally, by email or by an online process for the activity we require consent for and will record your response on our system. You can also opt in or out to receive marketing communications by ticking the appropriate option in your registration form (if you are a candidate)

Where consent is the lawful basis for our processing you have the right to withdraw your consent to this processing at any time by contacting <u>marketing@medicspro.com</u>. (please note that changes to marketing email preferences can take up to a week to take effect and that unsubscribing for marketing communications will not affect other communications where consent is not the legal basis for processing)



Who do we share your data with?

Where we need to do so, and always in line with data protection laws and requirements, we will **share** your personal information with:

- Any member of our Group within in the EEA
- Selected third parties including:
 - Clients and potential employers (e.g.: NHS Hospitals and Trusts, private sector healthcare providers)
 - Candidates for the purpose of arranging interviews and engagements with potential employers.
 - Clients, suppliers, contractors and providers for the performance and compliance obligations of any contract we enter with them (Pension Providers, Umbrella Companies, Framework Agreements, IT Solutions providers, CRM developers)
 - Other recruitment businesses in our supply chain (e.g.: Neutral Vendors, Master Vendors)
 - Compliance partners and other suppliers who we have engaged to provide services to you such as disclosure and barring checks, fit to work certificates and external training providers, for roles where this is a condition for employment, or we have legal obligations to do those checks.
 - Government and law enforcement bodies and regulators (to comply with our legal obligations and duties)
 - External auditors to ensure operational compliance.
 - Professional Registration Bodies (e.g.: NMC, GMC, HCPC, GPhC)

We do not do any transferring of your data to any different legal entity or organisation outside the EEA.

And how do we store it?

All your data is securely stored in our servers (internal and cloud-based) and protected against unauthorised use, damage, destruction and accidental loss.

Our CRM software incorporates GDPR compliant tools to ensure that your details remain secure, accessible and unadulterated for as long as we need to retain them.

Our staff is trained in the safe handling of personal data and only employees who have a genuine reason to do so, will be able to access and process your information.

We have robust data protection policies to ensure that data is disposed of safely when we do not have a reason to retain that information anymore.



We do all reasonable efforts to keep your information safe. However, as Internet and e-mail use are not entirely secure environments, we cannot guarantee the security or the privacy of any personal information you disclose or transfer using these channels.

Cookies in our website

Cookies are small files that get downloaded into your computer, your tablet or your smart phone when you visit our website. Their purpose is to recognise your device and store some information on your preferences or past actions.

Our website uses cookies. Some of those are essential to be able to run the service we provide to you (like page navigation or access any secure areas of the site) and others are intended to improve our service to you by recording statistical and analytical data about the way you use our site.

When you access our website, you will be asked whether you consent to have these cookies downloaded to your device. You will be informed which cookies are essential and which ones are used for analytics and you will be able to enable or disable cookies according to your preferences.

What are your rights in relation to your personal data?

Under GDPR, you have the fundamental **right to access** personal information held about you by us. You can make an access request at any time, verbally or in writing.

Additionally, you have the right to:

- **Request rectification** of your personal information. This right enables you to have any incomplete or inaccurate information we hold about you corrected or completed if it is incomplete or misleading.
- **Request erasure** of your personal information. You can ask us to erase your personal information if we do no longer have a reason to continue to process it, or if it is not needed for the purpose it was originally collected for. This is not an absolute right, and your right will have to be balanced with any legal obligation we may have to retain your data (or some of your data) for a specific amount of time (e.g.: your financial details or tax method-if you have been working for us- need to be retained for at least 6 years)
- **Object to processing** of your personal information where we are relying on a legitimate interest for processing it and there is something about your 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. You can ask us to stop or suspend the processing of personal information about you, for example if you want us to establish its accuracy.
- **Request the transfer** of your personal information to another party in certain formats, where practicable.

And, of course, you have the right to be informed about how we collect and use your personal data. If, after reading this privacy notice, you still feel you need more information or if something is not completely clear to you about the way we treat your information, we encourage you to get in touch so that we can clarify it for you.

Automated decision-making

Our activities do not involve the use of automated decision-making methods, including profiling.

Making a complaint about how your data is being handled.

The Information Commissioner's Office (ICO) is the public body responsible for enforcing data protection laws and regulation in the UK. It ensures that your rights in relation to your personal data are protected.

If you are not happy with the way we have handled your data, you can submit a complaint to them:

Make a complaint | ICO

The ICO can also help if you have a concern or if you just want to stay informed about data protection issues as a member of the public.

Changes to this Privacy Notice

For time to time, we will update this Privacy Notice to ensure it remains current and up-todate with any changes that may affect data privacy or the way we collect and process information. We encourage you to check it often.