

PRIVACY POLICY

1. Introduction

We are Surgi-Call Ltd (“we” or “us”), a company registered in England and Wales. Our company registration number is 6637952 and our registered office is at Metropolitan House, Building 900, 321 Avebury Boulevard, Milton Keynes, MK9 2GA.

We are committed to protecting your personal data. This privacy policy gives you detailed information on when and why we collect your personal data, how we use it and how we keep it secure. Please read this policy carefully alongside any applicable Terms & Conditions to understand our views and practices regarding your personal data and how we will treat it.

More information can be provided on request. Definitions, and words in bold type, are defined in the Appendix at the end of this privacy policy.

2. Legal bases for processing

As a recruitment business the Company collects and processes both *personal data* and *sensitive personal data*. It is required to do so to comply with other legislation. It is also required to keep this data for different periods depending on the nature of the data.

The Company will only process *personal data* where it has a legal basis for doing so (for more information please refer to the company data protection policy). Where the Company does not have a legal reason for *processing personal data* any processing will be a breach of the Data Protection Laws.

The Company will review the *personal data* it holds on a regular basis to ensure it is being lawfully processed and it is accurate, relevant and up to date.

Before transferring *personal data* to any third party (such as past, current or prospective employers, suppliers, customers and clients, intermediaries such as umbrella companies, persons making an enquiry or complaint and any other third party (such as software solutions providers and back office support)), the Company will establish that it has a legal reason for making the transfer.

3. Our responsibilities

For the purpose of the applicable Data Protection Legislation, we are the data controller of any personal data we process. As a data controller, we are responsible for ensuring our systems, processes, suppliers and People comply with Data Protection Legislation in relation to the personal data we handle.

We require our employees to comply with this privacy policy and our data protection policy when dealing with personal data.

We take Personal Data Breaches very seriously and are required to notify the Information Commissioner’s Office in the event of such a breach as appropriate.

When using, collecting and disclosing personal data, we follow the key data protection principles required under the General Data Protection Regulations.

We have policies, procedures and records to demonstrate compliance with the principles, as further detailed in our Data Protection Policy.

4. How we collect, use and disclose your personal data

Generally, we collect your personal data when you interact with us (for example, when entering into a relationship with us as a Temporary Worker, Customer or Employee). However, from time to time we also need to collect personal data from other third parties in connection with our relationship with you. We also look at how our users access and use our Website, so we can offer the best possible experience. The following tables summarise how we collect, use and disclose your personal data:



Temporary Workers (including prospective Temporary Workers)

Types of personal data	Collection	Purpose	Disclosure	Retention Period
<p>Information such as:</p> <ul style="list-style-type: none"> • your name, address, contact details, education and employment history; • identification documentation; • right to work status; • information relating to next of kin/ dependants; • financial information including bank details and identifiers (e.g. National Insurance numbers); • images/photographs of you; and • reviews/feedback relating to your ability as/to become a Temporary Worker. <p>We may also process sensitive personal data such as health details, medical details, your gender and racial origin.</p>	<p>Your personal data will be collected from various sources including:</p> <ul style="list-style-type: none"> • your application form, CV and various associated regulatory & mandatory application criteria and processes; • when you contact us via email or telephone • providers of background checks • notes and records kept for the duration of your engagement with as a Temporary Worker (including details of any complaints, breaches of the terms of your contract with us and meetings with us regarding our relationship and your engagement as a Temporary Worker • CCTV while on our premises; • from our clients (including reviews and feedback • providers of Occupational Health Services • Professional Regulators including the GMC, GDC, NMC and HPC 	<p>Your personal data will be used for the following purposes:</p> <ul style="list-style-type: none"> • internal administration and management purposes; • assessing suitability/eligibility and/or fitness as a Temporary Worker; • fulfilling our contractual obligations to you; • fulfilling our contractual obligations to our Clients; and • fulfilling our legal obligations. 	<p>Your personal data may be transferred to:</p> <ul style="list-style-type: none"> • our third-party service providers who support the operation of our business; • our Clients, for the purposes of fulfilling our contractual obligations; • our Affiliate Employment Agencies; and • other third parties such as our legal and other professional advisers and government departments. <p>We shall only transfer personal data to third parties which is limited to the relevant purpose and is adequately protected.</p>	<p>Temporary Worker personal data shall be kept for 10 years and we shall not keep your personal data for longer than is necessary.</p> <p>We will ensure we keep all personal data up to date and shall immediately and permanently delete any personal data which is not necessary for the purpose.</p>



Clients (including prospective Clients)

Types of personal data	Collection	Purpose	Disclosure	Retention Period
<p>Information such as your:</p> <ul style="list-style-type: none"> • Name and business information; • Identification documentation; • Payment details 	<p>Collection</p> <ul style="list-style-type: none"> • Your personal data will be collected for relationship management, booking process and invoicing of services. • Further information may be collected from third parties which may include credit reference checking services and other publicly available sources. <p>When you contact us via email or telephone, we may collect any personal data you provide to us.</p> <p>All additional personal data is collected when supplied to us or created by us in connection with a particular matter on which we are engaged.</p>	<p>Your personal data will be used for relationship management and file opening. Data will be used for providing locum booking services, administration, commercial purposes (e.g. creditworthiness) and as required by law (e.g. anti-money laundering).</p> <p>All other personal data will be used for the purposes of providing general recruitment services and to comply with our statutory and regulatory obligations.</p>	<p>Your personal data may be disclosed to:</p> <ul style="list-style-type: none"> • our third party service providers who support the operation of our business; • Our Temporary Workers for the purposes of fulfilling our contractual obligations; and • Other third parties as required for us to comply with our statutory and regulatory obligations. <p>We shall only transfer personal data to third parties which is limited to the relevant purpose and is adequately protected.</p>	<p>Client personal data shall be kept for 10 years and we shall not keep your personal data for longer than is necessary.</p> <p>We will ensure we keep personal data up to date and shall immediately and permanently delete and personal data which is not necessary for the purpose.</p>



Subscribers to our promotional material

Types of personal data	Collection	Purpose	Disclosure	Retention Period
<p>Information such as your:</p> <ul style="list-style-type: none"> • Name • Email address • Job title • Grade • Specialty <p>Additional information may be processed where it is provided by you, for example in correspondence, in connection with any Temporary Worker placement or potential placements or in letting us know your interests and how or when you wish to be contacted by us.</p>	<p>Your personal data is collected when you first register with us and thereafter on an ongoing basis as updated information is provided from you as part of the recruitment process.</p> <p>By providing this personal data, you agree to receive:</p> <ul style="list-style-type: none"> • information and updates about our Temporary Worker opportunities; • details of events and courses <p>You can contact us at any time to amend your preferences or opt out of all or part of communications from us.</p> <p>You will also be sent the option to opt out of future communications in every communication you receive from us (any statutory and regulatory obligations are exempt from this option).</p>	<p>Where you have engaged us in a clear and unambiguous manner for the purposes of sourcing Temporary Worker services on your behalf, your personal data will be used to:</p> <ul style="list-style-type: none"> • contact you about and provide you with, the communications we think are relevant to your interests, needs and preferences; and • understand our subscribers’ preferences and interests so we may improve our services, communications and marketing material. 	<p>Your personal data may be transferred to our third party service providers who support the operation of our business.</p> <p>This may include the transfer of your personal data outside of the European Economic Area (EEA). Where personal data is transferred outside of the EEA, it will be done so in a secure and proper manner and in accordance with best practice data protection guidelines.</p> <p>We shall only transfer personal data to third parties which is limited to the relevant purpose and is adequately protected.</p>	<p>Your personal data shall be kept for 10 years and we shall not keep your personal data for longer than is necessary.</p> <p>We will ensure we keep personal data up to date and shall immediately and permanently delete any personal data which is not necessary for the purpose.</p>

Users of our Website



Types of personal data	Collection	Purpose	Disclosure	Retention Period
<p>Information such as:</p> <ul style="list-style-type: none"> • technical information, including the Internet Protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, type of device used to access our Website and the location of where you access our Website via a mobile device; • information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our Website (including data and time), pages you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks and mouse-overs), and methods used to browse away from the page and any phone number used to call us. • Your name and email address, other contact/application details. 	<p>Your personal data is collected when you:</p> <ul style="list-style-type: none"> • use our Website (e.g. browsing. Searching); • Provide us with personal information to enable us to contact you and let us know of your marketing preferences and • Contact us via email 	<p>Your personal information is used to:</p> <ul style="list-style-type: none"> • tailor and enhance your user experience; • Improve the functionality of our Website; • ensure our Website caters to our users' preferences; • contact you about and provide you with the communications we think are relevant to your interests and requirements and; • contact you and provide you with information about our services. 	<p>Your personal data may be transferred to our third party providers who support the operation of our business.</p> <p>This may include the transfer of your personal data outside of the European Economic Area (EEA). Where personal data is transferred outside of the EEA, it will be done so in a secure and proper manner and in accordance with best practice data protection guidelines.</p> <p>We shall only transfer personal data to third parties which is limited to the relevant purpose and is adequately protected.</p>	<p>Our Website users' personal data shall be kept for 10 years and we shall not keep your personal data for longer than is necessary.</p> <p>We will ensure we keep personal data up to date and shall immediately and permanently delete any personal data which is not necessary for the purpose.</p>



Our Employees

Types of personal data	Collection	Purpose	Disclosure	Retention Period
<p>Personal data such as:</p> <ul style="list-style-type: none"> • your name, address, contact details, education history; • background checks (reference and criminal); • identification documentation; • right to work status; • information relating to next of kin and/or dependants and • financial information including bank details and identifiers (e.g. National Insurance numbers). <p>We may process sensitive personal data such as health details, racial origin, religious beliefs and information about offences or alleged offences.</p>	<p>Your personal data will be collected from various places including:</p> <ul style="list-style-type: none"> • your application form and CV; • providers of background checks; • notes and records kept for the duration of your employment (including absences, appraisals, disciplinary action); • providers of Occupational Health services; and • CCTV and security access devices 	<p>Your personal data will be used for the following purposes:</p> <ul style="list-style-type: none"> • human resources administration; • assessing suitability/eligibility and/or fitness to work; • security; and • training <p>Photographs and images of you, your name and information about your education and employment may be used in our marketing and promotional material including our Website and pitches to Clients.</p>	<p>Your personal data may be transferred to:</p> <ul style="list-style-type: none"> • our third party service providers who support the operation of our business; • our Clients for the purposes of fulfilling our contractual obligations. <p>We shall only transfer personal data to third parties which has been limited to the relevant purpose.</p>	<p>Our employees’ personal data shall be kept for the duration of employment and for 10 years thereafter.</p> <p>We shall not keep your personal data for longer than is necessary.</p> <p>We will ensure we keep all personal data up to date and shall immediately and permanently delete any personal data which is not necessary for the purpose.</p>

4. Transfer of Data between Jurisdictions

Personal data may be transferred to one of our affiliate companies for the purposes of fulfilling our obligations to our Clients. We also use a number of suppliers in connection with the operation of our business and they may have access to the personal data we process. For example, an IT supplier may see our personal data when providing software support, or a company which we use for a marketing campaign may process contacts' personal data for us. When contracting with suppliers and/or transferring personal data to a different jurisdiction, we take appropriate steps to ensure that there is adequate protection in place and that the principles are adhered to.

5. Your rights

Personal data must be processed in line with an individual's rights, including the right to:

- request a copy of their personal data;
- request that their inaccurate personal data is corrected;
- request that their personal data is deleted and destroyed when causing damage or distress; and
- opt out of receiving electronic communications from us.

Should you wish to make a request in line with your rights as an individual, please forward it to us using the contact details provided at the end of this privacy policy.

Our Employees must notify or inform Richard Moses immediately if they receive a request in relation to personal data which the company processes.

The Data Protection Legislation gives you the right to access information held about you. Your right of access can be exercised in accordance with the Data Protection Legislation (as applicable).

6. Security

Information security is a key element of data protection. We take appropriate measures to secure personal data and protect it from loss or unauthorised disclosure or damage. Our policy and approach to information security is contained within our Data Protection Policy.

7. 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 also allows us to improve our Website.

8. Changes to our privacy policy

Any changes we may make to this privacy policy 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 policy.

9. Contacts and complaints

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to us by writing to us at info@surgi-call.co.uk.

You should direct all complaints relating to how the company has processed your personal data to Richard Moses.

Alternatively, you can contact the ICO directly on 0303 123 1113 or at <https://ico.org.uk/global/contact-us/email/>

Appendix

Affiliate Companies: companies in jurisdictions outside of the UK who have:

- been engaged by us to provide professional services on our behalf in a jurisdiction outside of the UK.

Clients: any person, business or other organisation who engages, or is looking to engage, the services of our Company.

Controller: a personal/organisation who determines the purpose for which, and the manner in which, any personal data is processed.

Data Protection Policy: our internal data protection policy which sets out how we keep personal data secure, including technical measures (e.g. encryption of personal data, restricted access to personal data, monitoring and testing systems for unauthorised access, backups of personal data), roles and responsibilities of individuals and the scope of protection.

Employees: all people providing services to or working for us, including but not limited to our employees, directors, members, and contractors.

Personal data: information (including opinions) which relates to an individual and from which he or she can be identified either directly or indirectly through other data which we have or are likely to have in our possession. These individuals are sometimes referred to as data subjects.

Personal Data Breach: a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed by an organisation electronically. A personal data breach may mean someone outside the organisation gets unauthorised access to personal data, but a breach can occur if there is unauthorised access within the organisation or if an employee accidentally alters or deletes personal data.

Principles: the core data protection principles underlying the General Data Protection Legislation, which specify personal data should be: processed lawfully, fairly and in a transparent manner; collected for specified, explicit and legitimate purposes; adequate, relevant and limited to what is necessary; accurate and, where necessary, kept up to date; kept for no longer than is necessary; processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures. Additionally, organisations must adhere to the principal of accountability.

Process: the ‘processing’ of personal data captures a wide range of activities, and includes obtaining, recording and holding personal data and performing any operation of the personal data (including erasure/destruction).

Processor: any person (other than an employee of the data controller) who processes the data on behalf of the data controller.

Purpose: the purposes identified in the “Purpose” column of the tables in section 3 of this privacy policy (How we collect, use and disclose your personal data), as applicable.

Recruitment Process: the process of fulfilling temporary and permanent recruitment vacancies on behalf of our customers and clients.

Temporary Workers: Doctors, Nurses and Allied Health Professionals who have engaged, or are looking to engage, our specialist recruiter agency services and are or are considering being, represented by us.

Terms and Conditions: The Terms and Conditions for booking Temporary Workers and the Terms and Conditions for engagement of a Temporary Worker.

Third party: a person, organisation or other body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.