Company Name:	Healthcare and Locum Recruitment Ltd ('the Company')
Company Contact details:	Arlou Garcia – Account Manager 157 Dorset Road, Wimbledon SW19 3EQ
Document DP5	Privacy Notice (including for use on the company website)
Topic:	Data protection
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HLR is a recruitment business which provides work-finding services to its clients and work-seekers. HLR must process personal data (including sensitive personal data) so that it can provide these services – in doing so, HLR acts as a data controller.

You may give your personal details to HLR directly, such as on an application or registration form or via our website, or we may collect them from another source such as a jobs board. HLR must have a legal basis for processing your personal data. For the purposes of providing you with work-finding services and/or information relating to roles relevant to you we will only use your personal data in accordance with this privacy statement. At all times we will comply with current data protection laws.

Contents

1. Collection and use of personal data
    a. Purpose of processing and legal basis
    b. Legitimate interest
    c. Statutory/contractual requirement
    d. Recipients of data
2. Information to be provided when data is not collected directly from the data subject
    a. Categories of data
    b. Sources of data
3. Overseas transfers
4. Data retention
5. Your rights
6. Cookies
7. Login files
8. Links to external sites
9. Sale of the business
10. Data security
11. Changes to this privacy statement
12. Complaints or queries

1. Collection and use of personal data

a. Purpose of processing and legal basis

HLR will collect your personal data (which may include sensitive personal data) and will process your personal data for the purposes of providing you with work-finding services. This includes for example, contacting you about job opportunities, assessing your suitability for those opportunities, updating our databases, putting you forward for job opportunities, arranging payments to you and developing and managing our services and relationship with you and our clients.

In some cases, we may be required to use your data for the purpose of investigating, reporting and detecting crime and also to comply with laws that apply to us. We may also use your information during the course of internal audits to demonstrate our compliance with certain industry standards.

We must have a legal basis to process your personal data. The legal bases we rely upon to offer our work-finding services to you are:

- Your consent
- Where we have a legitimate interest
- To comply with a legal obligation that we have
- To fulfil a contractual obligation that we have with you

b. Legitimate interest

This is where HLR has a legitimate reason to process your data provided it is reasonable and does not go against what you would reasonably expect from us. Where HLR has relied on a legitimate interest to process your personal data our legitimate interests is/are as follows:

- Managing our database and keeping work-seeker records up to date;
- Providing work-finding services to you and our clients;
- Contacting you to seek your consent where we need it;
- Giving you information about similar products or services that you have used from us recently;

c. Statutory/contractual requirement

HLR has certain legal and contractual requirements to collect personal data (e.g. to comply with the Conduct of Employment Agencies and Employment Businesses Regulations 2003, immigration and tax legislation, and in some circumstances safeguarding requirements.) Our clients may also require this personal data, and/or we may need your data to enter into a contract with you. If you do not give us personal data we need to collect we may not be able to continue to provide work-finding services to you.

d. Recipient/s of data

HLR will process your personal data and/or sensitive personal data with the following recipients:

- Clients (whom we may introduce or supply you to)
- Former employers whom we may seek references from

- Payroll service providers who manage payroll on our behalf or other payment intermediaries whom we may introduce you to
- Other recruitment agencies in the supply chain

2. Information to be provided when data collected not from the data subject]

Categories of data: HLR has collected the following personal data on you:

- Name, address, mobile no., email
- National insurance no.
- Nationality (through right to work check)
- Emergency Contacts
- Health information including whether you have a disability
- Criminal conviction

This information did not come from a publicly accessible source.

3. Overseas Transfers

HLR will not transfer the information you provide to us to countries outside the European Economic Area ('EEA') for the purposes of providing you with work-finding services. The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein.

4. Data retention

HLR will retain your personal data only for as long as is necessary for the purpose we collect it. Different laws may also require us to keep different data for different periods of time. For example, the Conduct of Employment Agencies and Employment Businesses Regulations 2003, require us to keep work-seeker records for at least one year from (a) the date of their creation or (b) after the date on which we last provide you with work-finding services.

We must also keep your payroll records, holiday pay, sick pay and pensions auto-enrolment records for as long as is legally required by HMRC and associated national minimum wage, social security and tax legislation. This is currently 3 to 6 years.

Where HLR has obtained your consent to process your personal and sensitive personal data such as application forms, medical declaration forms, immunization documents and criminal records, we will do so in line with our retention policy. Upon expiry of that period HLR will seek further consent from you. Where consent is not granted HLR will cease to process your personal data and sensitive personal data.

5. Your rights

Please be aware that you have the following data protection rights:

- The right to be informed about the personal data HLR processes on you;
- The right of access to the personal data HLR processes on you;

- The right to rectification of your personal data;
- The right to erasure of your personal data in certain circumstances;
- The right to restrict processing of your personal data;
- The right to data portability in certain circumstances;
- The right to object to the processing of your personal data that was based on a public or legitimate interest;
- The right not to be subjected to automated decision making and profiling; and
- The right to withdraw consent at any time.

Where you have consented to HLR processing your personal data and sensitive personal data you have the right to withdraw that consent at any time by contacting [insert the identity and contract details of the person in your organisation who handles data protection issues and, where applicable, any representative of the controller and the data protection officer. Please note that if you withdraw your consent to further processing that does not affect any processing done prior to the withdrawal of that consent, or which is done according to another legal basis.

There may be circumstances where HLR will still need to process your data for legal or official reasons. Where this is the case, we will tell you and we will restrict the data to only what is necessary for those specific reasons.

If you believe that any of your data that HLR processes is incorrect or incomplete, please contact us using the details above and we will take reasonable steps to check its accuracy and correct it where necessary.

You can also contact us using the above details if you want us to restrict the type or amount of data we process for you, access your personal data or exercise any of the other rights listed above.

6. Cookies

We may obtain data about you from cookies. These are are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. Cookies also enable us to deliver more personalised content.

The table below explains the cookies we use and why.

Cookie	Name	Purpose	More information
hlrsys.net	.AspNetCore.Antiforgery	Used by the site to prove that requests come from the correct user	https://docs.microsoft.com/en-us/aspnet/core/security/anti-request-forgery?view=aspnetcore-2.1
hlrsys.net	.AspNetCore.Identity	Used by the site to prove the identity of the logged in user	https://docs.microsoft.com/en-us/aspnet/core/security/authentication/identity?view=aspnetcore-2.1&tabs=visual-studio%2Caspnetcore2x

hlrsys.net	ARRAffinity	Used by Microsoft Azure to ensure the user keeps communicating with the same server (where multiple servers may share the load for the site)	https://blogs.msdn.microsoft.com/benjaminperkins/2016/06/03/setting-application-request-routing-arr-affinity-for-your-azure-app-service/

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, [please refer to our Cookie policy. Please note that in a few cases some of our website features may not function if you remove cookies from your browser.

7. Log Files

We use IP addresses to analyse trends, administer the site, track users' movements, and to gather broad demographic information for aggregate use. IP addresses are not linked to personally identifiable information.

8. Links to external websites

HLR's website may contains links to other external websites. Please be aware that HLR is not responsible for the privacy practices of such other sites. When you leave our site we encourage you to read the privacy statements of each and every website that collects personally identifiable information. This privacy statement applies solely to information collected by HLR's website.

9. Sale of business

If HLR's business is sold or integrated with another business your details may be disclosed to our advisers and any prospective purchasers and their advisers and will be passed on to the new owners of the business.

10. Data Security

HLR takes every precaution to protect our users' information, lock filing cabinets, firewalls, browser certification technology, encryption, limited access, use of passwords etc.

Only employees who need the information to perform a specific job (for example, consultants, our accounts clerk or a marketing assistant) are granted access to your information.

HLR uses all reasonable efforts to safeguard your personal information. However, you should be aware that the use of email/ the Internet is not entirely secure and for this reason HLR cannot guarantee the security or integrity of any personal information which is transferred from you or to you via email/ the Internet.

If you share a device with others we recommend that you do not select the "remember my details" function when that option is offered.

If you have any questions about the security at our website, you can email samuel@hlrltd.com

11. Changes to this privacy statement

We will update this privacy statement from time to time. We will post any changes on the statement with revision dates. If we make any material changes, we will notify you.

12. Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it please contact: arlou@hrlltd.com or 0208 274 8625

You also have the right to raise concerns with Information Commissioner's Office on 0303 123 1113 or at https://ico.org.uk/concerns/, or any other relevant supervisory authority should your personal data be processed outside of the UK if you believe that your data protection rights have not been adhered to.