

## **LocumPoint Privacy Policy**

Your privacy is extremely important to us at LocumPoint. This policy will explain how and why we collect, use, process and store your personal data. It will also outline your rights under the General Data Protection Regulation of the European Union (GDPR) and The Privacy and Electronic Communications Regulations (PECR).

### **About us**

LocumPoint Ltd is a UK based recruitment service that specialises in the placement of locum and permanent pharmacists and other industry related staff. We are known as a "Data Controller" as we control, hold and process personal data as part of our business.

LocumPoint Ltd may also be referred to as "us", "we" and/or "our" in this Privacy Policy.

### **Our contact details**

Address: LocumPoint Ltd, Waterside House, Unit 3 Waterside Business Park, 1649 Pershore Rd, Birmingham, B30 3DR.

Tel: 07527 316910

Company Reg No: 469 12 11

Complaints or enquiries about this policy can be directed to [ben@locumpoint.com](mailto:ben@locumpoint.com).

### **Why we collect personal data**

To offer you appropriate work opportunities and to perform the service you have asked of us, we need to obtain personal information from you. We must also obtain personal data to identify you, ensure you are legally able to work in the UK and that you have the appropriate qualifications and accreditations.

### **What data we collect, receive and store**

#### **Data collected**

The data we collect from you includes your:

- Name, address, telephone number, email address, work and pay preferences, work history, photo ID, accreditation and/or training certificates (as required) your CV and your GPhC number.

#### **Data received**

We may receive data about you from external sources such as;

- Pharmacies, Government agencies and/or external due diligence checking services, the General Pharmaceutical Council.

If we introduce you to a pharmacy and you subsequently work for them without our involvement, you and the Pharmacy should still send us details of your work placements. The pharmacy may provide us with your name, the date and store you worked in, the hours you worked and the rate you were paid.

The above information will be collected and stored by us for accounting, record keeping and dispute resolution purposes.

If you or the pharmacy end your agreement with us, we will continue to collect details of your bookings for a period of six months from the date of either party's termination request. If a pharmacy continues to provide details of your bookings past this date, we will notify them and yourself. We will only hold on to this information for as long as is necessary and where the law allows.

Where we are required to undergo a DBS check, we may receive information about you from an external due diligence checking service or directly from the Government Disclosure and Barring Service. This information may disclose details of any memberships you hold and if you hold a criminal record.

The General Pharmaceutical Council may also disclose fitness to practice information about you.

### **Special Categories of Personal Data**

We do not request *Special Categories of Personal Data* from you such as your political views, religious beliefs, sexual orientation, health information or criminal convictions.

As we do not offer a payroll service we do not request or process your bank details as part of our business operations and we encourage you not to disclose your bank details to us. However, if you ask us to resolve a pay dispute or assist in registering your bank or personal details with a pharmacy, we may require this information from you which will then need to be disclosed.

If you provide us with information that reveals a special category of your personal data, we will only disclose it to a third party at your request.

### **How we collect data**

We collect the above information from you via email, telephone discussion or text message or through our website. You provide this information to us when you;

- Register with us via email or on our website
- Liaise with us over email, text message or telephone
- Give us feedback

Our website will only record your name, address, email and GPhC number and does not have a document upload function.

We use Google Mail as our primary email. If you have a Google mail (Gmail) account and register with us, any information you have included in your Gmail personal profile may be automatically transferred to us. Please change your privacy and security settings if you do not wish to disclose information held on your Gmail personal profile.

### **Data disclosure**

To perform the recruitment services you have requested, we need to disclose information about you. Your data may be disclosed in the following circumstances:

- If you respond to an email about a work opportunity, we will advise the relevant pharmacy of your name and the job you have applied for. We may also include a preferred salary or hourly rate. We will tell you when we have put your name forward and will let you know the outcome of your application. If the position is permanent, we may also send your CV to a pharmacy for review.

- If you advise us of your availability, we may pass this information on to the pharmacies we work with so that they can try to match you to upcoming jobs. Your name, work history and work preferences may be disclosed.
- If you are successful in securing a job placement we will send the relevant pharmacy a booking confirmation by email and will blind copy you in. The booking confirmation will include your name, details of the job placement and your GPhC number to confirm your registration with the General Pharmaceutical Council.
- We are required by HMRC to hold financial records and may at any time be asked to provide our records to them
- We may also need to provide records to an external tax accountant, legal advisor, IT support company or due diligence checking service for DBS checks.

We will not transfer your information outside the European Economic Area (EEA).

We will not disclose your address or contact details to pharmacies without your permission.

## **How we use your data**

We will only use your personal data for the purposes for which we collected it. If we need to use your data for another purpose, we will contact you. We will only process your personal information without your knowledge or consent where the law allows us to. Under Data Protection Law we can collect and process your personal data on the following grounds:

- To perform our contract with you. You have asked us to provide you with recruitment services. If we are not able to collect or process your personal data, we cannot comply with our contractual obligation to provide you these services
- Legitimate interests – we may process your personal data where we have a genuine and legitimate reason for doing and will ensure we do not compromise your rights and interests and are fair, accountable and transparent
- Legal compliance. Accounting and tax laws require us to hold records of payments received through our services. So that we can match payments received from pharmacies, details of work placements are recorded and stored by us.

In addition to the above legal grounds, we may also collect, process and store your data for Dispute or enquiry resolution. To investigate a dispute or resolve an enquiry we may need to review historical information about you. This information may be contained in past email exchanges or in our contact or accounting records.

## **Your rights**

If you are an EU Citizen or a non-EU national residing in the UK, you may have a right to:

- Request that your personal data be erased. If this request is made we will remove your contact details and personal data from our records. We will only retain information about you where the law allows.
- Request your personal data be corrected. We will amend your personal data at your request. It is your responsibility to notify us if any of your personal data is incorrect.
- Request access to your personal data. If you request access to your personal data, you will receive a copy of the personal data we hold about you.

- A right to complain or object. If you wish to raise a complaint, you may do so by emailing our office.

To ensure you have a right to access or alter your personal data we will need to identify you and will require specific information from you. This is a security measure to make sure your data is not disclosed to anyone not entitled to receive it.

## **Retention**

Your data will be retained for no longer than we need it for. Retention periods can vary and are dependent on why we need your data.

## **Data Security**

We have workplace security measures in place to ensure your personal data is protected and to prevent it from being lost, stolen, accessed, altered or disclosed. We do not allow anyone outside LocumPoint to access the information we hold aside from those named in this policy.

Whilst we try to protect your information with a range of procedures and security measures, we recognise that data transmitted over the internet cannot be guaranteed to be 100% safe or secure. Locum Point, therefore, accepts no liability if illegal access is made by a third party.

## **What if I do not want to provide information?**

We may not be able to provide services to you without specific information about you. Please contact us if you wish to discuss this further.

## **E-marketing and e-communication**

To provide the service you have requested, make you aware of job opportunities and keep you informed of industry related news, we must contact you. Our usual method of communication is email or text message.

The information we send to you by email includes but is not limited to;

- job advertisements
- booking confirmations
- requests to alter bookings and general job-related communication
- emails from training providers, pharmacies and industry organisations when required. These emails sometimes include a request for pharmacists to update their training or similar.

To ensure we comply with the Privacy and Electronic Communications Regulations (PECR) we offered existing customers a simple way of opting out of our emails when you registered with us and continue to do so in each email we send to you. Unless you have requested to opt out of our emails and continue to receive them without complaint, you are considered to have made a “soft opt-in” to receive e-communication from us. You can opt out at any time by emailing “unsubscribe” in response to any of our emails to you.

If you are new to LocumPoint we have asked for your consent to receive emails from us.

## **Changes to Privacy Policy**

A copy of our Privacy Policy is available on our website. Whilst we will endeavour to notify you if any amendments or updates have been made to our Policy, we encourage you to periodically check our website to keep abreast of any changes.

This Privacy Policy is effective as of 28 September 2018.