

iD Medical

Privacy Policy

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1. Introduction and Purpose of this Privacy Notice

This privacy notice describes how ID Medical Group Holdings Ltd (ID Medical) collects, processes and protects your personal data, eg, through your registration on and use of this website and by using our mobile app. It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide so that you are fully aware of how and why we are collecting and using your data.

We can only provide our services fully if the personal data we hold about you is accurate and up to date. Please keep us informed or update your details if your situation changes.

Our website is not intended for children and we do not knowingly gather nor process personal data related to children.

ID Medical Group Holdings Ltd (company number 11342556) comprises: ID Medical Group Ltd – (company number 03829536) Recruitment Express Ltd – (company number 03591406) and Group24 Ltd – (company number 08057994) and is located at ID Medical, ID House, 2 Mill Square, Wolverton Mill South, Milton Keynes, MK12 5ZD. Each group company is a Data Controller and responsible for your personal data (collectively referred to as 'ID Medical', 'we', 'us' or 'our' in this privacy notice).

ID Medical Group Holdings Ltd is wholly owned by AYA Healthcare UK Ltd (c/o McDermott Will & Emery UK LLP, 22 Bishopsgate, London, United Kingdom, EC2N 4BQ – company number: 15359712). Aya Healthcare UK Ltd is wholly owned by AYA Healthcare Inc whose registered office is at 5930 Cornerstone Court West, Suite 300, San Diego, CA 92121.

2. Why We Collect Your Personal Information

ID Medical's primary purpose is to place medical professionals into temporary or permanent roles primarily within the NHS, but also in Healthcare Organisations Worldwide. In order to ensure that suitably experienced and qualified candidates are put forward for vacancies, it is necessary to gather a range of personal information as outlined below.

3. How Your Data Is Collected Through Cookies

ID Medical collects your data online through submission forms on job boards, Typeform and ID Medical's website, which is hosted on WordPress and is integrated with HubSpot (an AI-powered customer platform). Our Website, Typeform and HubSpot use a number of tracking cookies to better understand a site visitor's behaviour. The types of cookies HubSpot sets include: analytics cookies, advertisement cookies, and cookies from third-party systems.

Similarly, when our mobile app is downloaded and used, additional tracking cookies will be set to improve our service and better understand a site visitor's behaviour.

For more information regarding cookies used, [click here](#).

When you consent to your personal data being used on our website, Google may also use your personal data in accordance with their Privacy & Terms. For more information please see: policies.google.com

4. What Information We Hold About You

We collect personal information about you when you register or apply for a job.

The information you provide is treated in accordance with current UK data protection legislation. The information collected includes:

- Identity Data, eg, name, username, date of birth, gender
- Contact Data, eg, address, email address, phone number(s)
- Financial Data, eg, bank account
- Technical Data, eg, IP address, log in details, browser type, operating system
- Profile Data, eg, profession, grade, specialty, CV, compliance documents, RTW, qualifications, DBS
- Marketing Preferences Data, eg, notification and communication preferences regarding our other products and services

5. Consent and Communications

We care about the privacy of our users. As outlined below, we collect, use and share personally identifiable information and non-personally identifiable information with approved third parties.

By registering your details and using the website or using our services generally, you agree to the collection of such information and to have your personal data and that of any person using your account collected, used, transferred and processed in accordance with this Privacy Policy. This includes being contacted for the purpose that the information was collected for.

As part of our overall marketing strategy and to improve services, we may incorporate 'Tracking Pixels' into our communications. This allows us to identify, for example, if an email has been opened. We would also like to contact you from time to time regarding our other products and services and you can opt-in to receive this information via our website or the contact details below.

In addition, calls made via our switchboard system are recorded for training and monitoring purposes.

You can withdraw or amend your consent for us to contact you regarding suitable assignments or our other products and services at any time via our website or by contacting us using the contact details below. However, please note that some consent is required to fulfil the purpose of securing suitable employment contracts.

By referring other individuals to us, you consent to us sharing your name with that individual. The individual(s) referred will be contacted by us for the purposes of work placement and their consent requested to retain their personal data.

Preferences regarding specific communications can be managed by contacting your recruitment consultant, calling our switchboard or emailing info@id-medical.com.

6. How and When We Use Your Personal Data – Legal Basis

We will only use your personal data where we have a legal basis to do so, ie:

- Where we need to fulfil a contract we have entered into with you. This would typically be when we have secured you a contract of employment
- Where it is necessary for our legitimate interest and your rights do not override these interests. This would typically be where we are searching for a suitable contract of employment for you, prior to commencement.
- Where we need to comply with legal or regulatory obligations. This would typically be to fulfil HMRC or framework requirements
- Where we have obtained your consent to use it

7. Data Sharing

We may share your personal information with members of our group, which means subsidiaries, and any ultimate holding company and its subsidiaries, as defined in section 1159 of the United Kingdom Companies Act 2006.

7.1 Sharing Your Information With Selected Third Parties, Including:

- Business partners, suppliers, NHS hospital trusts, auditors and sub-contractors for the performance of any contract we enter into with you.
- Aggregate, anonymous information about our users to advertisers and advertising networks to select and serve relevant adverts to you and others. This information does not identify you as an individual. We may also make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to a target audience.
- Aggregate, anonymous information about our users to analytics and search engine providers that assist us in the improvement and optimisation of the website.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.

We may also disclose aggregate, anonymous statistics about visitors to the website (users and transactions) in order to describe our services to prospective partners (advertisers, sponsors) and other reputable third parties and for other lawful purposes, but these statistics will include no personally identifiable information.

7.2 Sharing Information When Legally Obligated To Do So

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 these notices, terms and other agreements; or to protect the rights, property or safety of those with whom we do business, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

8. Third-Party Links and International Transfers

The website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that they have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check the policies of these websites before you submit any personal data.

If your aim is to work within the UK, your personal data is stored securely on servers based in the UK and EU. If your aim is to work in the US or elsewhere, your personal data may be stored outside of the EU. Appropriate safeguards and data transfer mechanisms are in place as required under articles 46 and 49 of the UK GDPR 2018.

Your personal data will be processed by colleagues in the UK, India (ID Medical (India) LLP) and in the USA (Aya Healthcare, Inc). ID Medical (India) LLP and AYA Healthcare colleagues log into our UK-based servers and adhere to the same data protection protocols as our UK colleagues. ID Medical (India) LLP is governed by an International Data Transfer Agreement (IDTA) and a Data Processing Agreement and operates as a Data Processor within strict operational requirements as defined under UK GDPR 2018. AYA Healthcare Inc is governed by an International Data Transfer Agreement (IDTA) and a Data Processing Agreement and operates as a joint Data Controller within strict operational requirements as defined under UK GDPR 2018.

9. Your Rights

You have a number of rights as outlined below. When exercising these rights we will need to validate your identity to ensure the request is from you. This is a security measure to ensure personal data is not disclosed to an unauthorised third party. You may exercise your rights by contacting us via the contact details below.

9.1 Right To Be Informed

Your 'Right To Be Informed' encompasses the right to be provided with 'fair processing information' to ensure transparency over how your personal data is used.

This is included in this Privacy Notice and our Terms and Conditions. The information provided should be:

- concise, transparent, intelligible and easily accessible;
- written in clear and plain language, and
- free of charge.

9.2 Right To Restrict Processing

You have the right to ask us not to process your personal data, eg, for marketing purposes. We will inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at marketing@id-medical.com

9.3 Right of Access

You have the right to access the information we hold about you. An access request is free of charge unless considered repetitive or excessive, in which cases, a small admin charge may be made. A request for access can be made via the contact details below.

9.4 Right of Rectification

You are entitled to have your personal data corrected if it is inaccurate or completed if it is incomplete. If the personal data in question has been disclosed to third parties, we will inform them of the rectification where possible and confirm with you which third parties the data has been disclosed to.

9.5 Right To Erasure

You have the right to request the deletion of personal data where there is no compelling reason for its continued processing. There are some circumstances where this right may not be met and a request refused, eg, to comply with a legal obligation such as HMRC or framework retention requirements (see Data Retention below for more details).

Requests for data deletion are all reviewed and actioned as per the requirements of the GDPR 2018. Associated third parties will also be advised to delete your data where reasonably practicable and you will be advised if your request cannot be met.

9.6 Right To Data Portability

The right to data portability allows you to obtain and reuse your personal data. It allows you to move, copy or transfer personal data easily in a safe and secure way, without hindrance to usability.

The right to data portability applies to personal data:

- provided by you;
- where you have provided consent for processing or the processing is for the performance of a contract; and
- when processing is carried out by automated means.

9.7 Right To Object

You have the right to object to processing based on the performance of a task in the public interest or processing based on a legitimate interest, eg, direct marketing. An objection must be based on your particular circumstances and processing must cease unless there are compelling reasons otherwise, eg, defence of a legal claim.

9.8 Rights Relating to Automated Decision Making and Profiling

Data protection legislation provides safeguards for individuals against the risk that a potentially damaging decision is taken solely based on automated processing, ie, without human intervention.

ID Medical employs no fully automated processes that result in particular individuals being impacted.

10. Data Security

If your aim is to work within the UK, your personal data is stored securely on servers based in the UK and EU. If your aim is to work in the US or elsewhere, your personal data may be stored outside of the EU. Appropriate safeguards and data transfer mechanisms are in place as required under articles 46 and 49 of the UK GDPR 2018.

We have in place appropriate security measures to prevent your data being accidentally lost, used, accessed in an unauthorised way, altered or disclosed. Access to your personal data is strictly limited to specific authorised individuals who require access to perform their roles.

Internal policies and procedures are in place and reviewed regularly to identify and notify of any breaches of these procedures.

11. Data Retention

We will only retain your data for as long as necessary to fulfil the purposes it was collected for and satisfy any legal, accounting or reporting requirements. For example, when you complete a contract, we need to retain your details for six years to satisfy HMRC requirements and some frameworks recommend retaining details for 21 years in case of any long-term emerging personal injury claims. If you have worked with us at any point, therefore, we will normally securely retain your details for 21 years.

Prior to completing a contract with us, by registering your details on our website we will, typically, retain your details for a period of three years unless you request that they be deleted. In this instance, we will anonymise your data so that it cannot be associated with you and can be retained securely for statistical research purposes.

12. Contact Us

Our Data Protection Officer will address questions relating to this privacy notice. If you have questions about this privacy notice, including requests to exercise your legal rights, please contact the DPO using the contact details below.

Contact via the website or by email is encrypted and none of the data you supply will be stored by the website or passed to or processed by a third-party processor.

To contact us, please visit our website: id-medical.com, or e-mail as follows:

- General enquiries: info@id-medical.com
- Marketing: marketing@id-medical.com
- Data Protection Officer: dpo@id-medical.com

Or telephone: (0)1908 552 820

13. Complaints

Should you have cause to make a complaint or express dissatisfaction with ID Medical, a member of its staff or processes, please email or telephone our Complaints Resolutions Team at:

resolutions@id-medical.com / 01908 552820. A member of our Resolutions Team will address your concerns as appropriate.

Should you feel that your concern has not been resolved satisfactorily, you also have the right to direct your complaint to the supervisory authority – contact details below.

14. Supervisory Authority and Data Breaches

The relevant supervisory authority for data protection legislation in the UK is the Information Commissioners Office (ICO). Their contact details are:

Information Commissioner's Office
Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF

Tel: 0303 123 1113 (local rate)

Website: <https://ico.org.uk>

ID-Medical has designed the protection and security of data protection into its systems, processes and staff knowledge. In the event that a breach of data protection is identified, the circumstances are logged and appropriate actions taken including informing the individuals concerned and the supervisory authority. Each case is considered separately and depends on the risk to the rights and freedoms of the individual(s) impacted.