



ASPIRE LOCUMS PRIVACY STATEMENT POLICY

This Privacy and Cookies Policy applies to all data collections and other data processing of **Aspire Locums**., in particular through www.aspirelocums.com and through its service platforms including social media owned and operated by us.

For purposes of this Privacy Statement Policy any reference to “**Aspire Locums**” (or “**our**” or “**us**” or “**we**”) shall mean **Aspire Locums** and /or their subsidiaries, as applicable. This Privacy Statement Policy describes how **Aspire Locums** collects, uses, shares and safeguards the personal information you provide to us. It also describes your choices regarding use, access and correction of your personal information. The use of information collected through our service shall be limited to the purpose of providing the **Aspire Locums** Services (“Service”) for which the customer has engaged in accordance with our Terms of Service, and other agreements. **Aspire Locums** partners with third party organisations outside the UK and it is their responsibility to ensure they are EU-U.S. Privacy Shield / Swiss-US Privacy Shield Framework Policy Statement is compliant with local laws as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the UK, European Union and Switzerland to the United States, respectively partners must ensure compliance certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this Privacy Statement Policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield programs, and to view our certification, please visit <https://www.privacyshield.gov>.

If you feel that **Aspire Locums** is not abiding by our Privacy Statement Policy, you should first contact the Data Controller at paul.a@aspirelocums.co.uk with your concerns. The invalidity or unenforceability provisions of any part of this Privacy Policy in any country shall not affect the validity or enforceability of any other provision of this Privacy Policy, which shall remain in full force and effect.

This statement sets out;

- Personal Data Collected
- How your personal data is collected
- How the information is used by us
- With whom the information may be shared and for what purpose(s)
- What choices you have available to you regarding collection and processing of the information
- The kind of security procedures that are in place to protect the loss, misuse or alteration of information collected
- How you can correct any inaccuracies with the information we hold

Personal Data Collected

- We collect the following categories of personal information from our customers, customers' candidates and Site visitors:
- Customer candidate contact Information such as name, email address, mailing address, phone number, employment history, health insurance information (excluding health information protected as “sensitive data” under EU/Swiss law), social security number, or tax, license or other identification numbers.
- Billing Information such as credit or debit card number, ACH payment information and billing address.
- Identifiers such as user name, account number, password, IP addresses.
- We also collect the following information from our customers: Information about a customer's business such as company name, company size, business type, and contact information.
- Demographic information of our customers, customers' candidates and Site visitors such as age, education, gender, interests, postal code, veteran status, union affiliation, and financial background check results (if applicable).
- Email addresses, names, and contact information of visitors who register for the Aspire Locums Communities.
- Email addresses and names in blog entries.
- Emails (including addresses and names) of our customers' users and their recipients.
- We use the personal information collected from these individuals only for the following purposes:
- Provide the Service to our customers.
- Keep records of customer activity.
- Keep records of customer information.
- Administer a customer's accounts.
- Respond to a customer's service or support requests.
- For marketing purposes.

We will only share your personal information with trusted third parties (our agents) in the ways that are described in this Privacy Policy. We do not sell your personal information to third parties.

We may email information regarding updates to the Service or additional service offerings to our customers in accordance with the terms and conditions of each customer's agreements with us.

Other third parties, such as content or third party service providers, may provide content or services through the Service and may need access to your personal information to provide their services to you. Customers will be using a Service to host data and information. Aspire Locums will not use or disclose your personal information, except (i) to the extent necessary to provide the Service to you or as requested by you, or (ii) pursuant to law, as determined by Aspire Locums in its sole discretion, or (iii) by a court order, or (iv) as described in Section 3.3.5 of this Privacy Policy. Individual customer or customer candidate records



may at times be viewed or accessed by Aspire Locums authorized employees or agents only for the purpose(s) of (i) providing the Service and related professional services to customer or customer candidates, (ii) resolving a support issue affecting any of them, (iii) to inspect and resolve a suspected violation of customer agreements with a customer, or (iv) as may be required by law, as determined by Aspire Locums in its sole discretion, judicial proceeding, subpoena, legal process or binding court order. We also reserve the right to disclose your personal information as required by law and when we believe, in our sole discretion, that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, subpoena, binding court order, or legal process.

Personal information may be disclosed or distributed to another party with which Aspire Locums enters, or may enter, into a corporation transaction. If Aspire Locums is acquired in a merger, acquisition, or sale of all or substantially all its assets, you will be notified via email, on our Site and/or by a prominent notice on our Service of any change in the uses of your personal information, as well as any choices you may have regarding your personal information. In the unlikely event of a bankruptcy, insolvency or liquidation, the database containing personal information may be treated as an asset of Aspire Locums and may be subject to transfer to a third party.

Aspire Locums may disclose personal information to companies that assist us in providing our Services or that partner with us to provide you their services or content. In this context, any such transfers to third parties are governed by our vendor agreements with them, which provide standards of care for the protection for personal and confidential information that are not less stringent than the standards contained in our customer agreements, and in no event, less than a reasonable standard of care. Such third-party companies are authorized to use your personal information only as necessary to provide these services to us and/or you and for the purposes for which the personal information were collected. In the case of partners with whom you contract directly, their policies regarding personal information will govern your relationship with them as stated in the applicable agreement between you and the partner and we will not be responsible for any actions or omission of these partners.

Customers are solely responsible for maintaining the confidentiality and security of their user registration and password. Customers or Site visitors may opt-out of receiving advertisement or promotional emails from us by selecting the opt-out link located in the message body of all our electronic communications. Customers or Site visitors may also email mail@aspirelocums.co.uk directly with a request to be removed from such communications. We may also track and analyse information that doesn't identify you as a person and aggregate usage and volume statistical information from our Site visitors, candidate customers and customers and provide such information in aggregated form to third parties.

Marketing; Aspire Locums will ask visitors who sign up to the Aspire Locums Communities to provide certain information, such as an email address to use and receive products and services from us. Aspire Locums will provide these visitors with the ability to opt-in or opt-out of future communications from the company. If you would like to discontinue receiving information, you may update your email preferences by using the "Unsubscribe" link found in the emails we send to you or on your member profile within our website or by contacting us at mail@aspirelocums.co.uk.

How your personal data is collected; Aspire Locums collects your personal data from a variety of resources such as *Cookies, Log files, Social Media, Plug-ins*, and other tracking technologies but we will always be able identify where your personal data came from. We will act responsibly and transparently when handling and processing your personal data.

How your personal data is stored; Aspire Locums applies reasonable and appropriate security measures to protect against the loss, misuse, and alteration of the personal information it processes. When the Service is accessed using a website browser, Secure Socket Layer (SSL) technology protects information using both server authentication and data encryption to help provide that personal information is a safe and secure transit. Aspire Locums also implements an advanced security method based on dynamic data and encoded session identifications, and hosts the Service in a secure server environment that uses a firewall and other advanced technology to protect against interference or access from outside intruders. Finally, Aspire Locums provides individual usernames and passwords that must be entered each time a website user logs in. These safeguards help protect against unauthorized access, maintain data accuracy, and provide for the appropriate use of personal information. Nevertheless, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee absolute security. If you have any questions about security on our Service, please contact us at mail@aspirelocums.co.uk. Aspire Locums has been awarded the Cyber Essentials Certification for the internet facing services used within our organisation.

Access to your Personal Information; We acknowledge that individuals have the right to access your own personal information at any time. We recommend that any individual who seeks to; access, correct, amend, or delete their personal information should direct your request (in writing) by contacting **Data Controller of Aspire Locums**, paul.a@aspirelocums.co.uk at no cost to the individual, we will respond within 45 days.

Job Applications and Registrations; we collect your personal data from job applicants, website registrations, and digital sources from Individuals who apply for temp or perm jobs with us. If the Individual is unsuccessful, we will ask the Individual if they want us to hold their information for other future suitable jobs.

Data Retention; we may retain your information for as long as your account is active or as needed to provide you with our Services, comply with our contractual and/or legal obligations, resolve disputes and enforce our agreements. Individuals have the right to have this information suppressed by unsubscribing to our services at any time. Suppressing individual's information allows us to historically retain information on our contractual and/or legal obligations.

We may retain personal information we process on behalf of our Candidates, Clients and Customers for as long as needed to provide Services. We will also retain this personal information as necessary to comply with our legal and/or contractual



obligations, resolve disputes, and enforce our agreements. When the purpose for which Aspire Locums is processing, the personal information is fulfilled, expires or is terminated, Aspire Locums will, upon request, provide our customers with a copy of their personal information stored by us, and Aspire Locums will then either delete or anonymize/de-identify any remaining personal information in accordance with our customer agreements.

Website Use; technologies such as cookies or similar technologies are used by Aspire Locums and our partners, affiliates, or our service providers. These technologies are used in analysing trends, administering the site, tracking users' movements around the site and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis.

We gather your information when you register with the Site. Users must provide names, contact information and information regarding the type of work seeking along with your skills, qualifications and experience. This information is then used to enable us to provide you with work-seeking services, provide products and/or information. If we have trouble processing your application, this contact information is used to get in touch with you. Aspire Locums does not use your information for any other purpose.

Cookies; *A cookie is a piece of data stored on the user's hard drive containing information about the user. Usage of a cookie is in no way linked to any personally identifiable information. Once the user closes their browser, the cookie simply terminates. For instance, by setting a cookie on our website, the user would not have to log-in with a password more than once if they have opted to "save their password", thereby saving time while using our website. If a user rejects the cookie, they may still use our site.*

We use cookies to remember users' settings (e.g. language preference), and for your authentication when you visit the Site or use the Service, as the case may be. The following information will help you to understand the different types of cookies used:

Strictly necessary cookies are required for the operation of the Site. These include, for example, cookies which are necessary for users to create an account or login to secure areas of the Site, and cookies that are required to show error or success messages to users.

Session cookies containing encrypted information to allow the system to uniquely identify you while you are logged in. Session cookies exist only during an online session. They disappear from your computer when you close your browser software or turn off your computer. This information allows Aspire Locums to process your actions and requests. Session cookies help us make sure you are who you say you are after you've logged in and are authorised to use the Site.

Persistent cookies that only Aspire Locums can read and use, to identify the fact that you are a customer or a visitor, who has registered for the Aspire Locums Community, to identify and maintain your preferences such as language, country and last check out or to receive certain types of content. Persistent cookies remain on your computer after you've closed your browser or turned off your computer. They include such information as a unique identifier for your browser. We are especially careful about the security and confidentiality of the information stored in persistent cookies. For example, we do not store account numbers or passwords in persistent cookies. Users or visitors who disable their Web browsers' ability to accept cookies will be unable to use all aspects of our service or the Aspire Locums Community.

Targeted cookies store a user's username, the referring user if using the referral network and the referral source to the Site.

Third party cookies used by

- [Google Analytics](#) uses cookies from Google Analytics to track user behaviours and overall trends. This helps us to improve the way the Site works.
- [Silverpop](#) use cookies from Silverpop to track user behaviours and market to users based on their behaviours.
- [Marketo](#) uses cookies from Marketo to improve user experience and shorten contact forms for visitors that have previously visited the Site.

Please note that other third parties may also use cookies. These cookies are likely to be analytical or performance cookies or targeting cookies and include, for example, those from advertising networks or providers of external services.

Opt-out; you can control the use of cookies at the individual browser level. If you reject cookies, you may still use our Site, but your ability to use some features or areas of our Site may be limited. Many browsers allow a private mode to be activated through which the cookies are always erased after the visit. Depending on each browser, this private mode can have different names. The following is a list of the most common browsers and the different names for "private mode":

- Internet Explorer 8 and later versions = In Private
- Safari 2 and superior = Private Navigation/Browsing
- Opera 10.5 and later versions = Private Navigation/Browsing
- Fire Fox 3.5 and later versions = Private Navigation/Browsing
- Google Chrome 10 and later versions = Incognito.

Targeted Advertisement; we partner with third parties to either display advertising on our Site or to manage our advertising on other sites. Our third-party partners may use technologies such as cookies to gather information about your activities on this Site and other websites to provide you advertising based upon your browsing activities and interests. If you wish to not have this information used for the purpose of serving you interest based ads, you may **opt-out** by updating your preferences. Please note this does not opt you out of generic ads. You may continue to receive generic ads.



Social Media; Social Media Features, Widgets and Plug-ins are used on our Site, such as LinkedIn, Facebook, Twitter. These features may collect your internet protocols (IP) address, which page you are visiting on our Site, and may set a cookie to enable the feature to function more efficiently. Social media features are either hosted by a third party or hosted directly on our Site. Your interactions with these features are governed by the privacy statement of the company providing it.

Blogs, Tweets or Posts; Our Site offers publicly accessible blogs, tweets and posts on our community forums. You should be aware that any information you provide in these areas are in the public domain and may be read, collected, and used by others who view them. To request removal of your personal information from our blog or community forum, contact us at mail@aspirelocums.co.uk in some cases, we may not be able to remove your personal information, in which case we will let you know if we are unable to do so and why. Alternatively, if you used a third-party application to post such information, you can remove it, either by logging into the application and removing the information, or by contacting the appropriate third party application.

How the information is used by us; Aspire Locums uses your personal details for the purposes of providing you with products, services and/or information. In providing such services, we promise to use your data in accordance with the General Data Protection Regulation (GDPR) We do not sell or rent your personal data to other organisations. However, we may be required to disclose personal data in response to lawful requests by public authorities or law enforcement agencies.

Do-Not-Track Disclosure; there are many web browser signals and mechanisms where you can indicate your choice to disable tracking, but we may not be aware of or able to honour every such mechanism because there is not yet a common understanding of how to interpret web browser-based "Do Not Track" (DNT) signals other than cookies. We may not respond to undefined DNT signals to our Sites or online services. More information about "do not track" is available at www.allaboutdnt.org

Individual Rights; Individuals have the right to be forgotten. If an Individual makes a written request to be forgotten, we must remove all personal data from our database and inform the individual when complete.

However, in the case where this will also delete any work history, assignments details, contracts, complaints, or other commercial historical data, we must only suppress the individual's personal data and unsubscribe them from our service(s).

If we are unable to delete the individual's personal data, we will inform the individual and explain why it is necessary to store their personal data for compliance with our contractual and/or legal obligations, resolve disputes and enforce our agreements.

The GDPR includes the following rights for individuals:

- the right to be forgotten
- the right to be informed
- the right of access
- the right to rectification
- the right to erasure
- the right to restrict processing
- the right to data portability
- the right to object
- the right not to be subject to automated decision-making including profiling

Website Analytics; Aspire Locums use Internet Protocols (IP) addresses to analyse trends, administer site traffic, track user's movement, and gather broad demographic information for aggregate use. IP addresses are not linked to personally identifiable information.

Links; our website contains links to other sites whose privacy settings may differ from those at www.aspirelocums.com. If you submit personal information to any of these sites, your information is governed by the applicable third-party's privacy policies. We therefore encourage you to carefully read the privacy policy for each website you visit and raise questions directly with the third-party providers.

Aspire Locums provides link for your convenience only and does not accept responsibility for the security or the information contained on any third-party website. We encourage our users to be aware when they leave our site to read the privacy statements of each and every website they visit that may collect personally identifiable information. This privacy statement applies solely to information collected by www.aspirelocums.com

Correction/Updating Personal Information; If your personally identifiable information changes (such as home address), we will endeavour to provide a way to correct, update or remove the personal data provided to us. This must be done in writing either letter or email; paul.a@aspirelocums.co.uk

Notification of Changes; If there are any changes to our privacy policy we will post a notice on our website, send you an email, memo's, letters. Just like other important messages, we add this to our email signatures so that all recipients become aware instantly of the new changes. Our users are always kept informed of what information we collect, how we use it, and under what circumstances, if any, we disclose it to third parties.

If at any point we used personally identifiable information in a manner different from that stated at the time it was collected, we will notify the individuals by way of email. Users will have a choice to accept as to whether or not we use their information in this different manner.

We will endeavour to always use your personal information in accordance with the General Data Protection Regulations under which the information was collected.



Security; our website takes every precaution to protect your personal information. When an individual submits sensitive information via the portal, your information is protected by encryption. When completing our online registration form and entering personally identifiable and sensitive information, that information is encrypted and protected by SSL certified encryption software while on our secure pages. The lock icon on the bottom of your web browsers such as Netscape Navigator and Microsoft Internet Explorer becomes locked, as opposed to un-locked, or open.

While we do use encryption software to protect your personal information online, we also do everything in our power to protect your personal information off-line too. All of your personal information held or processed, not just the sensitive information mentioned above is stored electronically on hard drives. Paper copies are scanned and shredded using a cross cut shredding machine.

Data Protection and Information Security; Aspire Locums processes personal data in relation to its own staff, work-seeking individuals, and client contacts. It is vitally important that we use this information in accordance to the principles of the General Data Protection Regulation.

- Staff Administration
- Advertising, marketing and public relations
- Financial Accounts and Records
- Administration and processing of work-seekers personal data for the purposes of work-finding services
- Counter Fraud and Security Management Services
- Her Majesty's Revenue and Customs

The Information Commissioners Office (ICO) requires Aspire Locums as data controller to process data in accordance with the principles of the new General Data Protection Regulation. These require that data shall be: -

- Fairly and lawfully processed
- Processed for limited purposes
- Adequate, relevant and not excessive
- Accurate
- Not kept longer than necessary
- Processed in accordance with the data subjects rights
- Kept securely
- Not transferred to countries outside the European Economic Area without adequate protection.

Personal data means data, which relates to a living individual who can be identified from the data or from the data together with other information, which is in the possession of, or is likely to come into possession of Aspire Locums.

Processing means obtaining, recording or holding the data or carrying out any operation or set of operations on the data. It includes organising, adapting and amending the data, retrieval, consultation and use of the data, disclosing and erasure or destruction of the data. It is difficult to envisage any activity involving data, which does not amount to processing. It applies to any processing that is carried out on computer including any type of computer however described, main frame, desktop, laptop, palm top etc.

Data should be reviewed on a regular basis to ensure that it is accurate, relevant and up to date and those people listed in the appendix shall be responsible for doing this.

Data may only be processed with the consent of the person whose data is held. Therefore if they have not consented to their personal details being passed to a third party this may constitute a breach of the General Data Protection Regulation. By instructing Aspire Locums to look for work and providing us with personal data contained in a CV work-seekers will be giving their consent to processing their details for work-finding purposes. If you intend to use their data for any other purpose you must obtain their specific consent.

However caution should be exercised before forwarding personal details of any of the individuals on which data is held to any third party such as past, current or prospective employers; suppliers; customers and clients; persons making an enquiry or complaint and any other third party.

Data in respect of the following is "sensitive personal data" and any information held on any of these matters MUST not be passed on to any third party without the express written consent of the individual:

- Any offence committed or alleged to be committed by them
- Proceedings in relation to any offence and any sentence passed
- Physical or mental health or condition
- Racial or ethnic origins
- Sexual life
- Political opinions
- Religious beliefs or beliefs of a similar nature
- Whether someone is a member of a trade union



From a security point of view, the Data Processors are permitted to add or amend data from the database and only the Data Controller is permitted to suppress/delete data from the database. However all Data Processors are responsible for notifying the Data Controller where information is known to be inaccurate or out of date. In addition all Employees should ensure that adequate security measures are in place. For example:

- Computer screens should not be left open by individuals who have access to personal data
- Passwords should not be disclosed
- Email should be used with care
- Personnel files and other personal data should be stored in a place in which any unauthorised attempts to access them will be noticed. They should not be removed from their usual place of storage without good reason.
- Personnel files should always be locked away when not in use and when in use should not be left unattended
- Any breaches of security should be treated as a disciplinary issue.
- Care should be taken when sending personal data in internal or external mail
- Destroying or disposing of personal data counts as processing. Therefore care should be taken in the disposal of any personal data to ensure that it is appropriate. For example, it would have been more appropriate to shred sensitive data than merely to dispose of it in the dustbin.

It should be remembered that the incorrect processing of personal data e.g. sending an individual's details to the wrong person; allowing unauthorised persons access to personal data; or sending information out for purposes for which the individual did not give their consent, may give rise to a breach of contract and/or negligence leading to a claim against Aspire Locums for damages from an employee, work-seeker or client contact. A failure to observe the contents of this policy will be treated as a disciplinary offence.

Data subjects, i.e. those on whom personal data is held, are entitled to obtain access to their data on request. All requests to access data by data subjects i.e. staff, members, customers or clients, suppliers, students etc. should be referred to the Data Controller whose details are also listed on the appendix to this policy.

Any requests for access to a reference given by a third party must be referred to Data Controller and should be treated with caution even if the reference was given in relation to the individual making the request. This is because the person writing the reference also has a right to have their personal details handled in accordance with the General Data Protection Regulation, and not disclosed without their consent. Therefore when taking up references an individual should always be asked to give their consent to the disclosure of the reference to a third party and/or the individual who is the subject of the reference if they make a subject access request. However if they do not consent then consideration should be given as to whether the details of the individual giving the reference can be deleted so that they cannot be identified from the content of the letter. If so the reference may be disclosed in an anonymised form.

Finally it should be remembered that all individuals have the following rights under the Human Rights Act 1998 and in dealing with personal data these should be respected at all times:

- Right to respect for private and family life [Article 8]
- Freedom of thought, conscience and religion [Article 9]
- Freedom of expression [Article 10]
- Freedom of assembly and association [Article 11]
- Freedom from discrimination [Article 14]

Policy Changes; we may update this privacy statement to reflect changes to our information practices that will become effective upon posting. If we make material changes to this policy, we will notify you here, by email, or by means of a notice through the Service channels prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices. The latest version of the Privacy Policy is listed at the bottom of each page within this document with a date stamp.

Data Integrity and Purpose Limitation; Aspire Locums will take all reasonable steps to provide that any personal information it processes (including any processing through its agents) is limited by the purpose(s) for which such personal information has been collected.

Recourse, Enforcement and Liability; Aspire Locums will attempt to reasonably resolve any concerns related to the processing of personal information directly with any individual. If you have any unresolved dispute with us or in the event a resolution cannot be reached, individuals may engage with the Information Commissioners Office. Any questions or complaints concerning this Privacy Policy or the handling of your personal information, please contact paul.a@aspirelocums.co.uk (**Aspire Locums Data Controller**).

APPENDIX



Data Controller

Mr Paul A Allward
Managing Director
Aspire Locums
100 Great Homer Street,
Liverpool
L5 3LF

Tel: 0870 803 30991

E-Mail: paul.a@aspirelocums.co.uk

All Data Processors

Data Processors are Employees of Aspire Locums NWLTD.

Information Commissioners Office

Call our helpline on **0303 123 1113** (local rate – calls to this number cost the same as calls to 01 or 02 numbers).

If you're calling from outside the UK, you may not be able to use our 03 number, so please call +44 1625 545 700.

Our normal opening hours are Monday to Friday between 9am and 5pm. However, we are closed after 1pm on Wednesdays for staff training.

We welcome calls in Welsh on 029 2067 8400. Rydym yn croesawu galwadau yn Gymraeg ar 029 2067 8400.

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