

**1 November 2019**

**Lantum Limited Privacy Policy**

**Overview – the key information you should be aware of**

(A) **Who we are:** We are Lantum Limited, a limited company registered in England & Wales (under company number 07529895 and with its registered office at 15 Bonhill Street, London, EC2A 4DN) ("**Company**", "**we**", "**us**" or "**our**"). We value the privacy of individuals who use our website and related services (collectively, our "**Services**"). This Privacy Policy, including our Cookie Policy ("**Policy**"), together with our Terms <https://lantum.com/terms/> of Use, explains how we collect, use, and share information from or about Lantum users or their devices. By using our Services, you agree to the collection, use, disclosure, and procedures this Privacy Policy describes.

(B) **References in this policy to:**

"Healthcare" Facilities such as a hospital seeking to fill sessional requirements for Healthcare Professionals.

"Healthcare Professional" refers to a physician, nurse or other healthcare professional seeking to offer themselves and secure sessional work with one or more Healthcare Facilities.

(C) **Who this policy applies to:**

This privacy policy applies to the collection, storage and use of personal information from or about you or your devices where "you" are:

1. Visitors to our website <https://lantum.com/> ("Site");
2. Users of our platform including:
  - Healthcare Professionals
  - Healthcare Facilities
3. Prospective Healthcare Professionals (to whom we send marketing communications);
4. People who contact us with inquiries (for example, as a result of coming across the Lantum platform at a networking event).

Specifically, this privacy policy provides you with details about the personal information we collect and hold about you, how we use your personal information and your rights regarding your personal information. It does not cover any use of your personal information by the Healthcare Facility. That use will be governed by the relevant Healthcare Facilities' privacy policy.

Depending on our relationship, we will collect and use your information in different ways. Please click on the links above to find out the information that we collect about you and how we use this information.

(D) **What this policy contains:** This privacy policy describes the following important topics relating to your information (you can click on the links to find out more):

1. What we do;
2. Collection of your personal information and how we use it:

3. How and why we share your personal information;
4. Your rights;
5. Marketing;
6. How we keep your personal information secure;
7. Links to other websites;
8. Changes to this privacy policy; and
9. Further questions and how to make a complaint.

### **The detail – the key information you should be aware of**

#### **1. What we do**

We provide a platform that allows Healthcare Professionals to find and manage sessional work and Healthcare Facilities to send shifts to their own healthcare professionals, perform compliance and run payroll.

There are three main ways of using the platform:

- 1.1 Marketplace: we provide a communications platform for Healthcare Facilities to post sessions, and for Healthcare Professionals to post their profiles when applying for sessions.
- 1.2 Float Pool: we provide a software platform for Healthcare Facilities registered on the Staff platform to manage their contingent workforce, helping them to identify their resourcing needs, spot trends, schedule shifts and pay Healthcare Professionals. We also provide a software platform for Healthcare Facilities who have formed an association of two or more practices (a "collaboration") to manage their Locum requirements helping them to identify their needs, spot trends, schedule shifts and pay Healthcare Professionals.

#### **2. How we obtain your personal information Where "you" are a Healthcare Professional**

2.1 We will collect your information when:

- (a) you register to use our Marketplace service <https://lantum.com/login>;
- (b) you access and browse our Site (including when you submit your information to us through data entry fields on the Site);
- (c) a Healthcare Facility for whom you have performed work as a Healthcare Professional ask us to include you as part of their staff bank or Float Pool;
- (d) you set up a profile in a Staff Bank or Float Pool;
- (e) you give us personal information about yourself by using the online forms provided on our website [or on our app,] [or by contacting us by phone, email or other means]. This includes, for example, where you provide your personal information to us in order to receive information or services from us.

- 2.2 In certain circumstances a Healthcare Facility may add your details to a Float Pool or Staff Bank [for use and access only by the relevant Healthcare Facility and (as applicable) collaborating Healthcare Facilities]. Where this is the case the Healthcare Facilities will act as data controller and Lantum will process your personal information on their behalf. In these circumstances use of your data will be governed by the relevant Healthcare Facilities privacy policy. However, where you register to use our Marketplace service processing of your information will be governed by this policy.

**Where "you" are a Healthcare Facility**

- 2.3 We will collect your information when:
- (a) you register to use and use any of the services on our Site; and
  - (b) you give us personal information about yourself by using the online forms provided on our website, or by contacting us. This includes, for example, where you provide your personal information to us in order to receive information or services from us, and information that you have provided to us at one of our networking events.

**3. Collection of your personal information and how we use it**

Please go to the section or sections below that best describes our relationship with you to find out the information that we collect about you and how we use this information. We refer to this as "personal information" throughout this policy.

**3.1 Healthcare Professionals**

What personal information we collect about you where "you" are a Healthcare Professional

(a) Initial Stage data collection

When you first register a profile on the Marketplace; or you first sign up to a float pool;

- (i) your name;
- (ii) your address;
- (iii) your email address;
- (iv) your telephone number;
- (v) your age;
- (vi) your gender;
- (i) your emergency contact information;
- (ii) a copy of your passport details including your passport photograph;
- (iii) your Social Security Number;
- (iv) your current and previous employment/work details, including job title and employer and relevant experience;

- (v) any professional certifications, education and qualifications, skills, career history, right to work status, citizenship, and any other information relevant or required by law to enable Healthcare Facilities to be able to assess whether or not they would want to engage you;
- (vi) your resume;
- (vii) details of your personal service company (where relevant);
- (viii) details of your self-employment (where relevant);
- (ix) records of your immunisations;
- (x) healthcare professional registration number
- (xi) your insurance details and/or indemnity cover;
- (xii) the results of a background check (including any information you provide relating to current and/or spent criminal convictions uploaded to the platform during the registration of a profile process);
- (xiii) any relevant right to work information uploaded to the platform during registration;
- (xiv) bank details to be able to create invoices;
- (xv) any details you fill out on your profile (bio, IT systems, qualifications and languages spoken); and
- (xvi) any other details you choose to provide us.

(b) Other data collection

In addition to the initial registration data we collect, we will collect and hold the following personal information:

- (i) details of the contract for services you or your personal service company holds with the Healthcare Facility relating to the work you do or will do for that Healthcare Facility, including timesheet data and charge rates;
- (ii) your selected job references;
- (iii) information provided when you correspond with us;
- (iv) information related to your availability;
- (v) any updates to information provided to us;
- (vii) information about your health and wellbeing while working as a Healthcare Professional;
- (viii) information about your preferences.

(c) **How we use your personal information**

We will collect, use and store the personal information listed above for the following reasons:

- (i) enabling you to advertise your availability as a Healthcare Professional and to communicate with Healthcare Facilities to arrange the delivery of your services to one or more Healthcare Facilities;
  - (ii) allowing Healthcare Facilities to view your profile when you; apply for a session, have worked a session, or are a part of Float Pool;
  - (iii) maintaining a record of your profile information and website use history so that Healthcare Facilities who are seeking someone with your skill set can easily request you to work with them again;
  - (iv) conducting profiling and business development activities, as well as market research and statistical analysis regarding activity via our platform. Such details will be anonymised as far as is reasonably possible;
  - (v) complying with any legal or regulatory requirements and to make the necessary disclosures under the requirements of any applicable law, regulation, direction, court order, guideline, which are applicable to us;
  - (vi) to allow you to access and use our website or the app;
  - (vii) to provide technical support;
  - (viii) to provide you with the information you request from us;
  - (ix) to store information about your preferences to customize our website and the app according to your individual interests;
  - (x) to recognise you when you return to our Site;
  - (xi) providing and improving our Site to ensure that content is presented in the most effective manner for you and your device; and
  - (xii) assisting in our efforts to keep our Site safe.
- (d) Where you use our Site to arrange work, we will store and use your personal information for the purposes of processing payment to you (as a payment agency for the Healthcare Facility ) with respect to services you have performed for the Healthcare Facility .
- (e) Where you opt to use our fast pay services we will store and use your personal information for the purposes of entering into a factoring arrangement with you, so as to enable you to receive faster payments with respect to the services you provide to Healthcare Facilities .

Please see sections 3.4 and 3.5 for more details about how we use your personal information.

- (f) If you first create your profile via the Marketplace your information will be visible to any Healthcare Facilities where you apply for a session or have worked a session.
- (g) If you first create your profile as part of a Float Pool the information you include in your profile will be accessible by the Healthcare Facility who has set up that Float Pool. When you set up your profile, you will also have access to Marketplace sessions.
- (h) In certain circumstances, a Healthcare Facility may add your details to a Float Pool (for use and access only by the relevant Healthcare Facility and as applicable, collaborating Healthcare Facilities). Where this is the case, Lantum will process your personal information on their behalf. In these circumstances use of your personal data will be governed by the relevant Healthcare Facility's privacy policy.
- (i) In certain circumstances, a GP Practice who has created a Staff Bank may choose to form or join a Collaboration. Where this is the case, if you have created a profile in a Staff Bank, your profile will be visible to all Healthcare Facilities in that Collaboration.
- (j) Sensitive Information. Some of the personal information that we collect about you or which you provide to us may be considered sensitive information. Sensitive information includes information about physical and mental health, sexual orientation, racial or ethnic origin, political opinions, philosophical belief, trade union membership and biometric data.
- (k) Background Checks. We work with third parties to perform background checks on Healthcare Professionals and receive publicly available information such as criminal history.
- (l) References and emergency contacts: the personal information we collect about you where "you" are a reference or emergency contact. We collect basic contact details (such as name, title, address, email and telephone) so that Healthcare Facilities can contact you for a reference or as an emergency contact for another Healthcare Professionals.

### 3.2 **Healthcare Facilities**

- (a) We, or third parties on our behalf, may collect and use any of the following information about Healthcare Facility Managers:
  - (i) your name;
  - (ii) work contact information (phone number, mailing address, email address);
  - (iii) your job title;
  - (iv) any opinion or feedback you share with us regarding a Healthcare Professional;
  - (v) details of any inquiries you raise with us regarding the services;
  - (vi) details of any collaboration plans you share with us.
- (b) How we use your personal information

We will collect, use and store the personal information listed above for the following reasons:

- (i) to provide relevant platform services to you (including, to allow you to confirm and engage Healthcare Professionals, for administration of your account with us, GP Practice loans, billing and debt collection purposes (where applicable));
- (ii) enabling Healthcare Facilities to manage their sessional work requirements via our Site;
- (iii) to allow you to access and use our Site;
- (iv) to provide technical support;
- (v) to provide you with the information you request from us;
- (vi) to store information about your preferences, and so allow us to customize our website according to your individual interests;
- (vii) to recognise you when you return to our Site;
- (viii) for improvement and maintenance of our Services and preparing reports or compiling statistics in order to improve our Services.
- (ix) to send you certain communications (including by email or post) about our Services such as service announcements and administrative messages (for example, changes to our terms and conditions and keeping you informed about our fees and charges);
- (x) to allow you to attend our events and to send you photos that you have permitted us to take of you;

Please see sections 3.4 and 3.5 for more details about how we use your personal information.

- (c) Source of personal information. We may receive some of your personal information from third party sources, such as your employer or your employer's company website. We may also collect this personal information from publicly available sources, such as LinkedIn or Federation websites.

### 3.3 All visitors to our website

- (a) What personal information we collect about you

We, or third parties on our behalf, may collect and use any of the following information about you:

- (i) your name;
- (ii) your mailing address;
- (iii) your email address;
- (iv) your telephone number;
- (v) information provided when you correspond with us;

- (vi) any updates to information provided to us;
- (vii) personal information we collect about you or that we obtain from our third-party sources;
- (viii) the following information created and recorded automatically when you visit our website:
  - (A) **Device information.** This includes: the Internet protocol (IP) address used to connect your computer to the internet address; the website address and country from which you access information; the files requested; browser type and version; browser plug-in types and versions; operating system; and platform. We use this personal information to administer our website, to measure the efficiency of our systems and to undertake an analysis on the locations from which people access our webpages.
  - (B) **Information about your visit and your behavior on our website** (for example, the pages that you click on). This may include the website you visit before and after visiting our website (including date and time), time and length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), traffic data, location data, weblogs and other communication data and information provided when requesting further service or downloads.

(b) How we use your personal information

We will collect, use and store the personal information listed above for the following reasons:

- (i) to allow you to access and use our Site;
- (ii) to communicate with you, provide you with updates and other information relating to our Site;
- (iii) to receive enquiries from you through the Site about any of Lantum's Site services;
- (iv) for improvement and maintenance of our Site and to provide technical support for our Site;
- (v) to detect and prevent security incidents;
- (vi) to recognise you when you return to our Site, to store information about your preferences, and to allow us to customise the Site according to your individual interests; and
- (vii) to evaluate your visit to the Site and prepare reports or compile statistics to understand the type of people who use our website, how they use our website and to make our Site more intuitive. Such details will be anonymised as far as reasonably possible;
- (viii) for other purposes for which we provide specific notice at the time the information is collected.



Please see sections 3.4 and 3.5 for more details about how we use your personal information.

- (c) A word about cookies
  - (i) Some pages on our website use cookies, which are small files placed on your internet browser when you visit our website. We use cookies in order to offer you a more tailored experience in the future, by understanding and remembering your particular browsing preferences.
  - (ii) Where we use cookies on our website, you may block these at any time. To do so, you can activate the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies), you may not be able to access all or parts of our website or to use all the functionality provided through our website.
  - (iii) For detailed information on the cookies we use and the purposes for which we use them, please refer to our cookies policy [here](#).

3.4 Whatever our relationship with you is, we may also collect, use and store your personal information for the following additional reasons:

- (a) to deal with any inquiries or issues you have about how we collect, store and use your personal information, or any requests made by you for a copy of the information we hold about you.
- (c) for internal corporate reporting, business administration, ensuring adequate insurance coverage for our business, providing security for our company facilities, research and development, and to identify and implement business efficiencies.
- (d) to comply with any procedures, laws and regulations which apply to us;
- (e) to establish, exercise or defend our legal rights.

#### 4. **How and why we share your personal information with others**

4.1 We may share your personal information with our affiliated companies for internal administrative purposes (for example, ensuring a consistent service for our clients and for you, corporate strategy, compliance, auditing and monitoring, research and development and quality assurance).

4.2 We will also share your personal information with the following third parties or categories of third parties:

- (a) our service providers and sub-contractors, including but not limited to payment processors, utility providers, suppliers of technical and support services, insurers, logistic providers, and cloud service providers;
- (b) public agencies and the emergency services;
- (c) companies that assist us in our marketing, advertising and promotional activities;

- (d) analytics and search engine providers that assist us in the improvement and optimization of our website.

4.3 We will also disclose your personal information to third parties:

- (a) if there is a merger, sale, or other asset transfer:
  - (i) if we sell or buy any business or assets, we may disclose your personal information to the prospective seller or buyer of such business or assets;
  - (ii) if substantially all of Lantum's or any of its affiliates' assets are acquired by a third party, in which case personal information held by Lantum will be one of the transferred assets;
- (b) if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, any lawful request from government or law enforcement officials and as may be required to meet national security or law enforcement requirements or prevent illegal activity;
- (c) in order to enforce or apply our Terms of Use or any other agreement or to respond to any claims, to protect our rights or the rights of a third party, to protect the safety of any person or to prevent any illegal activity; or
- (d) to protect the rights, property, or safety of Lantum, our staff, our customers (including residents) or other persons. This may include exchanging personal information with other organisations for the purposes of fraud protection and credit risk reduction.

4.4 We may also disclose and use anonymised, aggregated reporting and statistics about users of our website or our goods and services for any legally permissible purpose, including for internal reporting or reporting to our group or other third parties, and for our marketing and promotion purposes.

5. **Your rights**

- 5.1 There is no accepted standard on how to respond to Do Not Track signals, and we do not respond to such signals.
- 5.2 You can unsubscribe from our promotional emails via the link provided in the emails. Even if you opt-out of receiving promotional messages from us, you will continue to receive administrative messages from us.
- 5.3 If you reside in California and have provided your personal information to us, you may request information once per calendar year about our disclosures of certain categories of personal information to third parties for their direct marketing purposes. Such requests must be submitted to us at [privacyrequest@lantum.com](mailto:privacyrequest@lantum.com).

6. **Risks and how we keep your personal information secure**

- 6.1 Lantum is committed to protecting your personal information from loss, theft and misuse to the extent reasonably possible. We take reasonable precautions to safeguard the confidentiality of your personal information, including through use of appropriate organisational and technical measures.

6.2 In the course of provision of your personal information to us, your personal information may be transferred over the internet. Although we make every effort to protect the personal information which you provide to us, the transmission of information over the internet is not completely secure. As such, you acknowledge and accept that we cannot guarantee the security of your personal information transmitted to our website and that any such transmission is at your own risk.

6.3 Where we have given you (or where you have chosen) a password which enables you to access your online account, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

## **7. Links to other websites**

Our website may contain hyperlinks to websites that are not operated by us. These hyperlinks are provided for your reference and convenience only and do not imply any endorsement of the activities of such third-party websites or any association with their operators. This privacy policy only applies to the personal information that we collect or which we receive from third party sources, and we cannot be responsible for personal information about you that is collected and stored by third parties. Third-party websites have their own terms and conditions and privacy policies, and you should read these carefully before you submit any personal information to these websites. We do not endorse or otherwise accept any responsibility or liability for the content of such third-party websites or third-party terms and conditions or policies.

## **8. Children's Privacy**

We do not knowingly collect, maintain, or use personal information from children under 13 years of age, and no part of our Services are directed to children. If you learn that a child has provided us with personal information in violation of this Privacy Policy, please alert us via the Contact Information section, below.

## **9. Changes to our privacy policy**

We may update our privacy policy from time to time. Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by post or email. Please check back frequently to see any updates or changes to our privacy policy.

## **10. Further questions and how to make a complaint**

10.1 If you have any queries or complaints about our collection, use or storage of your personal information, please contact [privacyrequest@lantum.com](mailto:privacyrequest@lantum.com). We will investigate and attempt to resolve any such complaint or dispute regarding the use or disclosure of your personal information.

The practices described in this privacy policy statement are current as of 1 November 2019.