

PRIVACY NOTICE

(for website)

ELYSIUM HEALTHCARE PRIVACY POLICY

At Elysium Healthcare, we are committed to protecting and respecting your privacy.

This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

This website is not intended for children and we do not knowingly collect data relating to children.

Elysium Healthcare is made up of different legal entities, details of which can be found here <https://www.elysiumhealthcare.co.uk/locations/>. This privacy notice is issued on behalf of the Elysium Healthcare Group so when we mention "Elysium Healthcare", "we", "us" or "our" in this privacy notice, we are referring to the relevant company in the Elysium Healthcare Group responsible for processing your data. Elysium Healthcare Limited of 2 Imperial Place, Maxwell Road, Borehamwood, Hertfordshire WD6 1JN is the controller and responsible for this website.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO by writing to the Data Protection Officer, Elysium Healthcare Limited, 2 Imperial Place, Maxwell Road, Borehamwood, Hertfordshire WD6 1JN; or emailing: info@elysiumhealthcare.co.uk; or telephoning: 020 8327 1800.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to address your concerns before you approach the ICO so please contact us in the first instance.

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

CHANGES TO OUR POLICY

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

INFORMATION WE COLLECT FROM YOU

We will collect and process the following data about you:

This is information about you (Personal data) that you give us by filling in forms on our site www.elysiumhealthcare.co.uk (**our site**) or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you submit your contact information on our site and when you report a problem with our site. Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). It may include:

- **Identity Data** such as first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** such as postal address, email address and telephone numbers.
- **Transaction Data** such as details of services we have provided or are providing to you.
- **Technical Data** such as internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** such as your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** such as information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), page response times, length of visits to certain pages, methods used to browse away from the page, and any phone number used to call our customer service number.
- **Marketing and Communications Data** such as your preferences in receiving marketing from us and our third parties and your communication preferences.

We may also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We may also collect **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data), as well as information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

How is your personal data collected?

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply for our services;
- create an account on our website;
- subscribe to our service or publications;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us some feedback.

Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy below for further details.

Third parties or publicly available sources. This is information we receive about you if you provide your information to use through a third party, for example, referral information from

GPs or other healthcare professionals (this includes **Special Categories of Personal Data**), Facebook. In this case, you will have been informed when your data was collected of the purpose for which we were collecting it (for example, you supplying your email address to us through Facebook so that we can send you our Vacancy Newsletter). We will only use your data collected from third parties for the purpose for which we collected it (please refer to the section below on how we use your information).

How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Where we process **Special Categories of Personal Data**, we will use your personal data in the following circumstances:

- Where it is necessary for employment purposes.
- Where it is necessary to protect your or someone else's vital interests.
- Where it is in the public interest.
- Where it is necessary for medical or healthcare purposes.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer or service user	(a) Identity (b) Contact	Performance of a contract with you
To carry out our obligations arising from any contracts entered into between you and us and to provide you with the information and services that you request from us	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests
To notify you about aspects of or changes to our service (including sending you our Vacancy Newsletter if you have given your email address to us for that purpose)	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers and service users use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers and service users use our products/services, to develop them and grow our business)

<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity (b) Contact (c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical</p>	<p>Necessary for our legitimate interests (to study how customers and service users use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical (b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers and service users for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile</p>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>
<p>To discuss any referrals and to direct customers and service users to the most appropriate location or service provided by us</p>	<p>(a) Identity (b) Contact</p>	<p>Necessary for medical or healthcare purposes</p>

	(c) Special Categories of Data	
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MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this relationship marketing).

You will receive marketing communications from us if you have requested information from us or purchased services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

No marketing will be provided or carried out based on any **Special Categories of Data**.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside the Elysium Healthcare group of companies for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages by contacting us at any time at info@elysiumhealthcare.co.uk.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of services we provide to you.

COOKIES

What are cookies?

When you visit Elysium Healthcare's website, Elysium uses "cookie" technology to make that experience simple, personalised and meaningful. Cookies are small pieces of information with a unique identifier which are sent to your computer or any similar device you use to access the internet e.g. smart phone, tablet or other mobile device when you visit a website and which store and sometimes track information about your use of the website.

Your browser's preferences can permit a website to send its own cookie to your browser. Many websites do this automatically whenever a user visits their website in order to report on

website traffic. Your browser will prevent a website accessing the cookies sent to you by other websites.

A number of cookies Elysium use last only for the duration of your web session and expire when you close your browser. Other cookies are used to remember you when you return to the website and will last for longer.

How does Elysium use cookies?

Elysium uses cookies to:

- recognise when a visitor to the Elysium Healthcare website has visited before; this means we can identify the number of unique visitors we receive to the website and allows us monitor the traffic to the website to make sure we have enough capacity to ensure the website works efficiently for the number of users that we get;
- customise elements of the promotional layout and/or content of the pages of the website;
- store the user's details (locally on their browser) in completing a form on the website so that the form contains the user's details (using the same browser); and
- collect statistical information about how our visitors use the website(s) so that we can improve the website(s) and learn which parts are most popular to visitors.

How to manage cookies

- Internet browsers allow users to manage their cookies. They can be set to accept all cookies, to let them know when a cookie has been set, or never to receive cookies.
- Each browser works in a different way: use the 'Help' menu in your browser to find out how to change your cookie preferences. For information on how to do this on the browser of your mobile phone or tablet you should refer to your handset manual.
- Please be aware that disabling cookies completely means that certain personalised features will not then be provided to that user and therefore they may not be able to make full use of all of the website's features.
- Some of the cookies used by the Elysium Healthcare website are set by us, and some are set by third parties who are delivering services on our behalf. Managing, deleting or blocking these cookies requires you to visit the websites of these third parties. Details are provided in the section Third-party cookies below.
- Most web browsers automatically accept cookies but, if you prefer, you can change your browser to prevent that or to notify you each time a cookie is set. You can also learn more about cookies by visiting allaboutcookies.org which includes additional useful information on cookies and how to block cookies using different types of browser.

1. a) *Our cookies*

- We may set a number of cookies for user experience.

b) *Third party cookies*

- Certain cookies are either set by third parties on our website or these are set by us using the third party's cookie code. More information about cookies placed by third parties and how to restrict or block their cookies can be accessed by following the link to their website. Below is a list of third party cookies we currently use.

Cookie	Name	Purpose	More Information
Google Analytics	_utma	These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.	Google Analytics Privacy Policy
	_utmb		
	_utmc		
	_utmz		

- In addition to cookies, tracking gifs may be set by us or third parties in respect of your use of our website. Tracking gifs are small image files within the content of our site or the body of our newsletters so we or third parties can understand which parts of the website are visited or whether particular content is of interest.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible

with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

DISCLOSURE OF YOUR INFORMATION

We may have to share your personal data with the parties set out below for the purposes set out in the table above:

- Any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.
- Selected third parties assisting with the optimisation of our website and search engine providers that assist us in the improvement and optimisation of our site.

We will disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If Elysium Healthcare or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If 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 our terms of use and other agreements; or to protect the rights, property, or safety of Elysium Healthcare, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

WHERE WE STORE YOUR PERSONAL DATA

All information you provide to us is stored on our secure servers and we have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

INTERNATIONAL TRANSFERS

Some of our administrative third party providers, such as our I.T. helpdesk, are based outside the European Economic Area (EEA) so they may from time to time access personal data in connection with the provision of their services. This is on an ad-hoc basis and their processing of your personal data will not involve a routine transfer of data outside the EEA.

However, whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

DATA RETENTION

We will not keep your personal data for longer than is necessary for the purpose. This is to ensure that information is properly managed and is available whenever and wherever there is a justified need for that information. Data is retained for specified periods (depending on the record) and then securely destroyed under our document retention policy.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

YOUR RIGHTS

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Data Protection Officer in writing. She may be contacted at 2 Imperial Place, Maxwell Road, Borehamwood, WD6 1JN or email info@elysiumhealthcare.co.uk.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Data Protection Officer. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.