



Head Medical

Our Privacy Policy

1. Who is responsible for your data?
2. Personal data we collect about you
3. How and why we use your personal data
4. Requesting access to your data
5. Security of your personal data
6. Cookies
7. Sharing your personal data
8. Updates to our privacy policy
9. Contact Information

Head Medical is committed to protecting your safety and privacy, and takes its responsibilities regarding the security of candidate and client information very seriously. This policy explains what personal data we collect, how and why we use it, who we disclose it to, and how we protect your privacy.

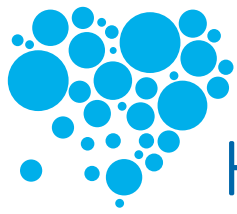
1. Who is responsible for your data

Our Privacy Policy applies to personal data that Head Medical collects and uses. References in this Privacy Policy to “Head Medical”, “we”, “us” or “our” mean Head Medical, 20 Alva Street, Edinburgh, UK, EH2 4PY (a subsidiary of Head Resourcing, a company registered in Scotland with Registration No. SC 208 200 and registered at HM General Register House, 2 Princes Street, Edinburgh, EH1 3YY).

We control the ways your personal data is collected and the purposes for which your personal data is used by, and act as the “data controller” for compliance with the UK Data Protection Act 1998, Swiss Federal Act on Data Protection, and the Ordinance and other applicable European data protection legislation. Our current Data Protection Officer is Kirsty Godsal.

2. Personal data we collect about you and how we use it

When using the term “personal data” in this Privacy Policy, we mean information that relates to you and allows us to identify you, either directly or in combination with other information that we may hold. Your personal data may include, for example, your name, contact details, information pertaining to your recruitment



Head Medical

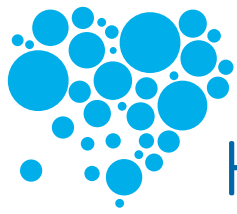
needs, CV details, or any job applications (in progress or historical). This is data you provide us strictly for the purpose of your job search and recruitment process.

We collect some personal data from you - for example when you use our website, use our services, or contact us in anyway. We may also receive personal data from third party providers (for example if you sign up to job sites / online directories who share your details with external companies to provide relevant information of interest).

For more information, please see **Section 7**.

We may collect and process the following categories of information:

Information collected	Under what circumstance
Contact details - can include name, surname email address, telephone number, postal address, professional status, speciality and location preferences, and also your CV / cover letter if you choose to upload to our site.	When you create an account on our website or contact us with an enquiry.
Advanced candidate information - includes CV, cover letter, information about your health, medical council registration, criminal convictions, references, and your agreement for us to provide recruitment services on your behalf.	When you agree to make an application to an employer.
Information about employment offers and contracts, authorised reference collection, your acceptance. Medical information such as health screening (e.g. immunisation records, TB and HIV status). Please see our sensitive information section.	When you are made an employment offer
Information about your medical registration application and supporting documents, which we share with the appropriate medical council in the country of employment.	When we make the application on your behalf.



Information collected	Under what circumstance
Information about your visa application and supporting documents, which we will share with the appropriate immigration department in the country where your application lies (and that of any family members also moving).	When we make the application on your behalf.
Payment details.	If we are involved in your payment process or to pass on to your employer or for applications made on your behalf in connection with medical registration or immigration. These details are deleted at the end of your application.
The communications you exchange with us (for example, your emails, letters, calls, or your messages).	When you contact Head Medical or are contacted by Head Medical.
Information about how you use our website, such as job searches, the pages you visit, length of visit, cookies.	When you visit our website.

Sensitive personal data

In the course of providing our services, we may collect information that could reveal your racial or ethnic origin, physical or mental health, religious beliefs, criminal convictions (alleged or proven), or any investigations / limitations imposed by your current or previous medical councils. Such information is considered “sensitive personal data” under the UK Data Protection Act 1998 and associated data protection laws. We collect this information only when you have provided it and given us explicit consent to use it (a necessary prerequisite), or have deliberately made it public.

For example, we may collect this information if:

- Your new employer has requested it as part of the on boarding process (location dependent)
- It is required by a medical council in your applications for medical registration and a licence to practice
- It is requested by a government immigration body in order to make a visa application

By providing sensitive personal data you agree that we may collect and use it in



Head Medical

order to provide our recruitment services (in accordance with this Privacy Policy).

If you do not allow us to process any sensitive personal data, this may mean we are unable to proceed with your application. However, we are happy to have an open discussion with you if you have concerns in order to find potential ways forward. Be assured that we only process the information needed to submit your applications.

3. How and why we use your personal data

We use your personal data for the following purposes:

- To communicate with you (including but not limited to job alerts, information on events we run/attend, any relevant industry news that we believe would be of interest).

We will send you communications when you create an account on our website, email us with enquiries, or apply to one of our job adverts through an external site and do not express a wish to opt out of such communications.

You can manage your communications preferences via your [online account](#) (Contact Preferences), by emailing data@headmedical.com with the subject 'Unsubscribe', or by calling our Business Support Team on +44 (0)131 240 5259.

Please note that we do not share your contact details or personal data with other companies for marketing purposes.

You can also opt out from email marketing at any time by clicking on the unsubscribe link at the bottom of any email you receive from us.

- To comply with our legal obligations

For example, we will retain your records indefinitely post placement in case of any potential employment disputes that may arise in the future.

4. Requesting access to your personal data

You have a right to request access to the personal data that we hold about you. This includes any documents we have collected from you during the recruitment process.

If you would like to request a copy of your personal data, or have any questions



Head Medical

in relation to the information we hold, please email data@headmedical.com with the following details:

- Full name
- A description of the data that you are requesting
- All email addresses (past and present) used

Under current legislation, we have 40 days to action your request following initial contact. We will endeavour to process your request well in advance of this deadline, but cannot guarantee that this will always be the case. Please note that:

- Missing information will delay the processing of your request
- We reserve the right to charge a £10 administration fee in processing your request, in accordance with relevant legislation

5. Security of your personal data

We are committed to taking appropriate technical and organisational measures to protect your personal data against unauthorised or unlawful processing, accidental loss, destruction or damage. When you provide your personal data through our website or representatives it is transmitted securely across the internet using high-grade encryption.

As described in this Privacy Policy, we will in some instances disclose your personal data to third parties (with your consent) during the recruitment process. In instances where Head Medical discloses your data to a third party, we stipulate that they must have appropriate technical and organisational measures in place to securely protect your personal data.

The information that you provide will be held on our servers, which are located either at our premises or those of appointed third-party IT service providers. We may allow access to your information to third-parties who act on our behalf for the purposes described in this Privacy Policy.

Your personal data may be accessed by and processed outside the European Economic Area (comprised of the European Union and Iceland, Liechtenstein and Norway, also referred to as the EEA) including by staff operating outside the EEA who work for our clients in recruitment services (this includes staff engaged in, among other things, the processing of your application for employment, medical registration and visa application). Where your personal data is transferred



Head Medical

outside of the EEA, we require that appropriate safeguards are in place and they comply with this policy.

Head Medical uses Pulsant and Mimecast for its email delivery service, Firefish as our database, Google Inc for web analytics services and ECS for its support application.

We will retain your personal data for as long as we need it in order to fulfil our obligations set out in this Privacy Policy and also to comply with relevant legal frameworks.

6. Cookies or other tracking technologies

In order to improve our services and provide you with more relevant content and to analyse how visitors use our website, we may use technologies such as Cookies. Please be aware that in most cases we will not be able to identify you from the information we collect using these technologies.

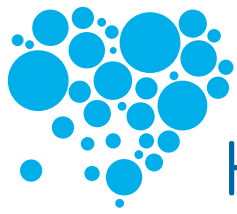
Head Medical may set and access Cookies on your computer. Cookies may be placed on your computer when you visit certain parts of the website. Head Medical use these to identify and track visitors, their usage of the website, their access preferences and for advertising. Currently we do not have the technical ability to get your express permission to opt out of our cookies so we encourage you to use your browser settings if you want to control these.

7. Sharing your personal data

Your personal data may be shared with other parties involved in the recruitment process, including (but not limited to) potential employers, relevant medical councils, and immigration departments. It may also be disclosed to a third party who acquires us, and the new owner or newly controlling party will, under the terms of this Policy, be permitted to use the Data for the purposes for which it was supplied by you.

In the event that any Data submitted by Users will be transferred in such a manner, you will be contacted in advance and informed of the changes. When contacted you will be given the choice to have your Data deleted or withheld from the new owner or controller.

We will only share minimal contact details with our partners who offer relevant services, with your consent. These services include financial services and



Head Medical

international removal services. Please be assured that we only share your sensitive information with parties involved in your recruitment process, medical registration or visa application.

Third parties may share your data with us for example job boards or online directories. If you do not wish to be informed about our job opportunities or forthcoming events you can be removed from the contact list provided by our supplier by emailing data@headmedical.com to unsubscribe. Head Medical cannot be responsible for the entry of your data onto these sources but will certainly action any requests not to be contacted by us and will always share with you how we received your information so you have greater control over your personal data.

8. Updates to our Privacy Policy

We may make changes to this Privacy Policy from time to time, including as part of the new European data protection legislation which will start to apply on 25 May 2018 (the “General Data Protection Regulation”). We will update the Privacy Policy and we will publish on our website any new version of this Policy.

9. Contact information

Questions, comments, requests and complaints regarding this privacy policy are welcomed and should be addressed to Kirsty Godsal.

10. Making a complaint

If you feel you would like to make a complaint about us, you can approach the Information Commissioner’s Office [via their website](#) or call them on their hotline on 03031 231 113.