

Lantum Privacy Policy

Overview of Policy

Lantum Limited is the data controller in respect to the personal information that you provide us with. This privacy policy, together with our Terms and Conditions and any other documents referred to, forms the basis of our collection, storage and use of personal data collected by Lantum.

We value your privacy and want to remain accountable, fair and transparent with you in the way that we collect and use your personal information when you visit our website/ app, use our products and services or engage with our customer support team.

References in this policy to:

“**NHS Bodies**” mean the following groups that form the NHS. ICB (Integrated Care Boards), ICS (Integrated Care Systems), PCN (Primary Care Network), GP Practices, Federations, UTC (Urgent Treatment Centre), Remote Consultation Providers, Secondary Care Hospital Departments.

“**Healthcare Professionals**” means any clinical or non-clinical member of staff seeking to offer themselves and secure sessional work with one or more NHS Bodies.

“**Healthcare organisations**” means a medical practice seeking to fill sessional requirements for healthcare professionals. This also includes Practice Managers who provide their contact details to Lantum in order for the healthcare organisation to be able to use the Lantum Platform.

The types of personal data we process

Healthcare Professionals, Healthcare Organisations and Website Users

- **Identity Data** - This includes your first name, maiden name, last name, photograph, title, date of birth and gender
 - How we collect it, why we collect it and the legal basis for processing it
 - We may collect identity data when you contact us via email, telephone, the customer support chat function or when you sign up to use the Lantum platform. This information may also be shared with relevant NHS Bodies who, from time to time, may contact you directly with shift opportunities. The legal basis we

rely on for this is Article 6(1)(f) of the GDPR - Legitimate Interests and Article 6(1)(b) - Contractual Obligations.

- Where do we store it?
 - All the information you provide is stored by our cloud hosting provider. All data originating from the UK is stored in Ireland within the EU. All data originating from the US is stored in the US.
- How long do we keep it for?
 - We keep the identity data mentioned above for no more than 12 years after your most recent enquiry or post customer relationship
- **Contact Data** - This includes your billing address, email address and telephone numbers
 - How we collect it, why we collect it and the legal basis for processing it
 - We may collect contact data when you contact us via email, telephone, via the customer support chat function or when you sign up to use the Lantum platform. This information may also be shared with relevant NHS Bodies who, from time to time, may contact you directly with shift opportunities. The legal basis we rely on for this is Article 6(1)(f) of the GDPR - Legitimate Interests and Article 6(1)(b) - Contractual Obligation.
 - Where do we store it?
 - All the information you provide is stored by our cloud hosting provider. All data originating from the UK is stored in Ireland within the EU. All data originating from the US is stored in the US.
 - How long do we keep it for?
 - We keep the contact data mentioned above for no more than 12 years after your most recent enquiry or post customer relationship
- **Financial Data** - This includes your bank account and payment card details
 - How we collect it, why we collect it and the legal basis for processing it
 - We may collect financial data when you sign up to use the Lantum platform so that we can process payments for completed shifts or subscriptions for use of the platform. The legal basis we rely on for this is Article 6(1)(b) of the GDPR - Contractual Obligation.
 - Where do we store it?

- All the information you provide is stored by our cloud hosting provider in Ireland within the EU
 - How long do we keep it for?
 - We keep the financial data mentioned above for no more than 12 years post customer relationship
- **Transaction Data** - This includes details about payments between us and other details of purchases made by you
 - How we collect it, why we collect it and the legal basis for processing it
 - We may collect transactional data when any payments are made between us and Healthcare Professionals or Practice Managers. The legal basis we rely on for this is Article 6(1)(f) of the GDPR - Legitimate Interests and Article 6(1)(b) - Contractual Obligation.
 - Where do we store it?
 - All the information you provide is stored by our cloud hosting provider in Ireland within the EU
 - How long do we keep it for?
 - We keep the transaction data mentioned above for no more than 12 years post customer relationship
- **Technical Data** - This includes your login data, internet protocol addresses (IP), browser type and version, browser plug-in types and versions, time zone setting and location, operating system and platform and other technology on the devices you use to access our site
 - How we collect it, why we collect it and the legal basis for processing it
 - We may collect technical data from website users and anyone who signs up to use the Lantum platform for system maintenance and general business protection and for data analytics to improve our marketing, website and customer experience. The legal basis we rely on for this is Article 6(1)(f) of the GDPR - Legitimate Interests.
 - Where do we store it?
 - All the information you provide is stored by our cloud hosting provider. All data originating from the UK is stored in Ireland within the EU. All data originating from the US is stored in the US.
 - How long do we keep it for?
 - We keep the technical data mentioned above for no more than 12 years post customer relationship or recent enquiry

- **Usage Data** - information about how you use our website and services
 - How we collect it, why we collect it and the legal basis for processing it
 - We may collect usage data from website users and anyone who signs up to the Lantum platform to better analyse how a product or service is being used. The legal basis we rely on for this is Article 6(1)(f) of the GDPR - Legitimate Interests.
 - Where do we store it?
 - All the information you provide is stored by our cloud hosting provider. All data originating from the UK is stored in Ireland within the EU. All data originating from the US is stored in the US.
 - How long do we keep it for?
 - We keep the usage data mentioned above for no more than 12 years post customer relationship or recent enquiry

- **Marketing Data** - This includes your preferences in receiving marketing content and your communication preferences in relation to us, relevant NHS Bodies that may have shift opportunities or third parties. You can opt out anytime by clicking 'unsubscribe' on our marketing emails, changing your notification preferences on your Lantum account or emailing privacyrequest@lantum.com and requesting to be removed from marketing communications.
 - How we collect it, why we collect it and the legal basis for processing it
 - We may collect marketing data from current and potential Healthcare Organisations and Healthcare Professionals. We may occasionally send you updates and marketing emails to keep you up to date with what we're up to. The legal basis we rely on for this is Article 6(1)(f) of the GDPR - Legitimate Interests and Article 6(1)(a) - Consent.
 - Where do we store it?
 - All the information you provide is stored by our cloud hosting provider in Ireland within the EU
 - How long do we keep it for?
 - We keep the marketing data mentioned above for no more than 12 years post customer relationship or recent enquiry

- **Communications with us** - This includes your support queries, calls with customer support or any questions, comments or problems you communicate with us
 - How we collect it, why we collect it and the legal basis for processing it
 - We may collect communication data from anyone who contacts us to help analyse and improve our platform. The legal basis we rely on for this is Article 6(1)(f) of the GDPR - Legitimate Interests
 - Where do we store it?
 - All the information you provide is stored by our cloud hosting provider in Ireland within the EU
 - How long do we keep it for?
 - We keep the communication data mentioned above for no more than 12 years post customer relationship or recent enquiry

- **Research Data** - In order to improve the Lantum platform, we regularly conduct surveys to gather feedback. Special category data such as ethnicity and religion is only collected for compliance with NHS frameworks, however, all the information collected is anonymised before being shared and all surveys are completely optional with no required answers. We also collect additional consent before any research surveys are completed.
 - How we collect it, why we collect it and the legal basis for processing it
 - We may collect research data from anyone who consents to providing feedback. This is done to help analyse and improve our platform and to also meet NHS requirements when submitting framework applications. The legal basis we rely on for this is Article 6(1)(c) of the GDPR - Legal Obligation and Article 6(1)(f) - Legitimate Interests. We also rely on Article 9(g) Reasons of Substantial Public Interest (with a basis in law) and Schedule 1 of the DPA 2018(8) Equality of opportunity or treatment.
 - Where do we store it?
 - All the information you provide is stored by our cloud hosting provider in Ireland within the EU
 - How long do we keep it for?
 - We keep the communication data mentioned above for no more than 12 years post customer relationship or recent enquiry

- **Third Party Software Suppliers** - Lantum uses third party software suppliers for customer relationship management and to process payments. Personally

Identifiable Information (PII) is often processed through these third party softwares however, Lantum has strict security procedures in place for how these are chosen and used, in line with our ISO 27001 certification. Each third party software also has their own Privacy Policies in place that we have assessed and they are also subject to confidentiality clauses or Non-disclosure agreements to ensure your data is safe at all times.

- How we collect it, why we collect it and the legal basis for processing it
 - The data provided to our third party softwares is used to form and maintain customer relationships by allowing us to manage communications. We also use this data to make and receive payments from healthcare professionals and organisations for sessions that have been completed. The legal basis we rely on for this is Article 6(1)(f) - Legitimate Interests.
- Where do our third party suppliers store it?
 - The vast majority of our suppliers are cloud-based and store PII data in data centres located in London and Ireland. Those who do not store data in the UK are either recognised as a safe country to receive and process personal data or have appropriate safeguards in place in line with the GDPR.
- How long do we keep it for?
 - We keep the data mentioned above, on our third party supplier platforms, for no more than 12 years post customer relationship or recent enquiry

Healthcare Professionals Only

- **Professional Data** - This includes your employment history, professional qualifications, certifications, references, CV, GMC/NMC number and any other information required by a healthcare organisation to assess your ability to work with them.
 - How we collect it, why we collect it and the legal basis for processing it
 - We may collect professional data from Healthcare Professionals who sign up to Lantum to find shifts. This information may also be shared with practices you decide to work with. The legal basis we rely on for this is Article 6(1)(f) of the GDPR - Legitimate Interests and Article 6(1)(c) - Legal Obligation
 - Where do we store it?
 - All the information you provide is stored by our cloud hosting provider. All data originating from the UK is stored in Ireland within the EU. All data originating from the US is stored in the US.

- How long do we keep it for?
 - We keep the professional data mentioned above for no more than 12 years post customer relationship or recent enquiry

- **Screening Data** - This includes clinical governance checks (including the results and application of DBS, police or similar checks for any information provided relating to current and/or spent criminal convictions).
 - How we collect it, why we collect it and the legal basis for processing it
 - We may collect screening data from Healthcare Professionals who sign up to Lantum to find shifts. This information may also be shared with practices you decide to work with; however, additional consent will be requested when we apply for a DBS on your behalf and when uploading DBS documents. Our Clinical Governance team will also contact referees, by email, for all approved GPs. The legal basis we rely on for this is Article 6(1)(c) of the GDPR - Legal Obligation. Additionally, the condition for processing we rely on is Schedule 1 (2) Health or Social care purposes under the 2018 Data Protection Act.
 - Where do we store it?
 - All the information you provide is stored by our cloud hosting provider. All data originating from the UK is stored in Ireland within the EU. All data originating from the US is stored in the US.
 - How long do we keep it for?
 - We keep the screening data mentioned above for no more than 12 years post customer relationship

- **Medical Data** - This includes any additional data you provide regarding your health. For example, immunisations you may have had. All additional health/security related documents require further consent when uploading.
 - How we collect it, why we collect it and the legal basis for processing it
 - We may collect medical data from Healthcare Professionals who sign up to Lantum to find shifts. This information may also be shared to your Lantum profile which is visible to practices to help increase your chances of booking sessions, however all additional documents require further consent. The legal basis we rely on for this is Article 6(1)(f) of the GDPR - Legitimate Interests. Additionally, the condition for processing we rely on is Article 9

- (h) of the GDPR - Health or Social Care and Schedule 1 (2) Health or Social care purposes under the 2018 Data Protection Act.
 - Where do we store it?
 - All the information you provide is stored by our cloud hosting provider. All data originating from the UK is stored in Ireland within the EU. All data originating from the US is stored in the US.
 - How long do we keep it for?
 - We keep the screening data mentioned above for no more than 12 years post customer relationship
- **Profile Data** - This includes your ID number, shift bookings, name of hospital/department, biography, additional qualifications, clinical systems and spoken languages, feedback and any other notes on your account.
 - How we collect it, why we collect it and the legal basis for processing it
 - We may collect profile data from Healthcare Professionals who sign up to Lantum to find shifts to help increase shift opportunities. This information may also be shared with relevant NHS bodies. The legal basis we rely on for this is Article 6(1)(f) of the GDPR - Legitimate Interests
 - Where do we store it?
 - All the information you provide is stored by our cloud hosting provider. All data originating from the UK is stored in Ireland within the EU. All data originating from the US is stored in the US.
 - How long do we keep it for?
 - We keep the professional data mentioned above for no more than 12 years post customer relationship or recent enquiry

Lantum offers a diary management and Locum service organisational tool to Healthcare Professionals using the Lantum platform via a third party, called Locum Organiser. Use of this tool is completely optional. If a Healthcare Professional opts to use Locum Organiser, Locum Organiser will share the following information with Lantum:

- a) Healthcare Professional's full postcode
- b) How far the Healthcare Professional is willing to travel to provide services to a Healthcare Organisation, from the individual's full postcode
- c) Healthcare Professional's GMC number

This information will be used by Lantum to flag, via the platform, when the Healthcare Professional is available to do sessional work. The legal basis we rely on for this is Article 6(1)(f) - Legitimate Interests.

In all cases, it is Lantum's legal obligation to use and share personal data if we suspect any wrongdoing or are required to support any legal or financial investigations.

Website Cookies

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies enable us to provide a variety of features and functionality. For example, cookies enable us to identify you, secure your access to Lantum and save your product usage preferences which will ensure everyone who uses Lantum has the best possible experience. Any browser visiting these sites will receive cookies from us.

We use the following categories of cookies:

Strictly necessary cookies. These are cookies that are required for the operation of our website.

They include, for example, cookies that enable you to log into secure areas of our website or make use of e-billing services.

Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

Functionality cookies. These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences.

Targeting cookies. These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the content displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

You block cookies by activating 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 site.

Except for essential cookies, all cookies will expire after 2 weeks unless renewed again by visiting our sites. For detailed information on the use of our cookies, please refer to our cookie policy - <https://www.lantum.com/cookie-policy/>

What are your rights?

- **The Right to be Informed**

You have the right to be informed about how your data is being collected, processed, stored, used and who it will be shared with as detailed in this Privacy Policy.

- **The Right of Access**

You have the right to request copies of what information we hold on you and to know what we are doing with that information.

- **The Right to Rectification**

You have the right to ask us to change or correct the personal information we hold about you if you believe it is inaccurate or incomplete.

- **The Right to Erasure**

You have the right to ask us to erase your personal information, in some circumstances.

- **The Right to Restrict**

You have the right to block or suppress the processing of your personal information for a duration of time, in some circumstances.

- **The Right to Data Portability**

You have the right to request to transfer the personal information we hold about you to either yourself or a third party, in a structured, commonly used and machine readable format, in some circumstances.

- **The Right to Object**

You have the right to ask us to stop processing your personal information in some circumstances. For example, when we are relying on our own (or someone else's) legitimate interests to process your personal information, when we are processing your personal information for direct marketing or when we are processing your personal information for research purposes.

You don't have to pay anything in order to exercise your rights. Please contact us at privacyrequest@lantum.com, Lantum Ltd, 1 Mark Square, London EC2A 4EG, if you wish to make a request under your rights. We then have 30 days to get back to you with a response.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at privacyrequest@lantum.com.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

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

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

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