

12 March 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**") is the data controller in respect of the personal information which you provide us. This Privacy [and Cookie] Policy ("**Policy**"), together with our Terms of Use and any other documents referred on it, governs the basis of our collection, storage and use of personal data collected by Lantum.

(B) **Our values and what this policy is for:** We value your privacy and want to be *accountable* and *fair* to you as well as *transparent* with you in the way that we collect and use your personal information. We also want you to know *your rights* in relation to your information which you can find here.

In line with these values, this privacy policy tells you what to expect when we collect and use personal information about you. We have tried to make it easy for you to navigate so you can find the information that is most relevant to you and our relationship with you.

We are always looking to improve the information we provide to our users and contacts so if you have any feedback on this privacy policy, please let us know using our contact details in section 12.

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

"**GP Practice**" mean a medical practice seeking to fill sessional requirements for locum doctors [and other clinicians].

"**GP Practice Manager**" means any individual contact at a GP Practice who provides their contact details to Lantum in order for the GP Practice to be able to the Lantum platform.

"**Locum**" means a healthcare professional seeking to offer themselves and secure sessional work with one or more GP Practices.

["**Locum Organiser**"] – the complete online admin toolkit for GP locums.

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

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

1. Visitors to our website <https://lantum.com/> ("Site");
2. Users of our platform including:
  - Locums including
  - GP Practice managers ;
3. [Users of the [App name/supplier] app] ;
4. Prospective GP Practice Managers and Locums (to whom we send marketing communications);
5. People who contact us with enquiries (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 a GP Practice whether or not they have accessed your information via our platform. That use will be governed by the relevant GP Practice's 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. How we obtain your personal information;
3. Collection of your personal information and how we use it;
4. Our legal basis for using your personal information;
5. How and why we share your personal information;
6. How long we store your personal information;
7. Your rights;
8. Marketing;
9. Risks and how we keep your personal information secure;
10. Links to other websites;
11. Changes to this privacy policy; and
12. Further questions and how to make a complaint.

(E) **Your rights to object:** You have various rights in respect of our use of your personal information as set out in section 7. Two of the fundamental rights to be aware of are that you may:

1. ask us to stop using your personal information for direct-marketing purposes. If you exercise this right, we will stop using your personal information for this purpose.
2. ask us to consider any valid objections which you have to our use of your personal information where we process your personal information on the basis of our, or another person's, legitimate interest.

You can find out more information in section 7.

(F) **What you need to do and your confirmation to us:** Please read this privacy policy carefully to understand how we handle your personal information. By engaging with us in the ways set out in this privacy policy, you confirm that you have read and understood the entirety of this privacy policy, as it applies to you.

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

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

We provide a platform that allows Locums to find and manage sessional work and GP Practices to send shifts to their own doctors, meet new GPs, perform compliance and run payroll.

There are three main ways of using the platform:

- 1.1 **Marketplace:** we provide a communications platform for GP Practices to post sessions, and for Locums to post their profiles when applying for sessions.
- 1.2 **Staff bank:** we provide a software platform for GP Practices registered on the Staff platform to manage their contingent workforce, helping them to identify their resourcing needs, spot trends, schedule shifts and pay Locums.

1.3 Collaborative bank: we provide a software platform for GP Practices 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 Locums.

1.4 Lantum also provides GPs with access to a third party partner, Locum Organiser, which provides an optional scheduling tool for Locums.

## 2. **How we obtain your personal information**

### **Where "you" are a Locum**

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 GP Practice for whom you have performed work as a Locum ask us to include you as part of their staff bank or collaborative bank;
- (d) you use Locum Organiser to schedule your shifts;
- (e) you set up a profile in a Staff Bank or Collaborative Bank;
- (f) 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 GP Practice may add your details to a Collaboration or Staff Bank [for use and access only by the relevant GP Practice and (as applicable) collaborating GP Practices]. Where this is the case the GP Practice and/or collaborating GP Practices 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 GP Practice's privacy policy (ies). However, where you register to use our Marketplace service processing of your information will be governed by this policy.

### **Where "you" are a GP Practice**

2.3 We will collect your information when:

- (a) you register to use and use any of the services on our Site;
- (b) [you give us personal information about yourself by using the online forms provided on our website [or by contacting us by phone, email This includes, for example, where you provide your personal information to us in order to receive information or services from us or 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 **Locums**

What personal information we collect about you where "you" are a Locum

#### (a) Initial Stage data collection

When you first register a profile on the Marketplace; or you first sign up to a Staff Bank or Collaborative Bank;

- (i) your name;
- (ii) your postal 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 national insurance 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 clients to be able to assess whether or not they would want to engage you;
- (vi) [any other information which you include in your CV];
- (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 (for example general practitioners may provide their GMC number);
- (xi) your insurance details and/or indemnity cover;
- (xii) the results of pre-employment screening or vetting checks (including the results of any Disclosure and Barring checks and 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 the registration of a profile process;
- (xiv) bank details to be able to create invoices and;
- (xv) any details you fill out on your profile (bio, IT systems, qualifications and languages spoken).

(b) Other data collection

In addition to the initial stage 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 GP Practice relating to the work you do or will do for that GP Practice, including timesheet data and charge rates;
- (ii) references from third parties such as previous employers and nominated referees;
- (iii) any e mail communications, including attachments, which you send to us;
- (iv) information provided when you correspond with us;
- (v) information related to your availability which we will obtain through your use of Locum Organiser (the sharing of your data between Lantum and Locum Organiser is further detailed in section 5);
- (vi) any updates to information provided to us;

- (vii) information about your health and wellbeing whilst working as a Locum;
- (viii) details of your character;
- (ix) 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 Locum and to communicate with GP Practices to arrange the delivery of your services to one or more GP Practices;
- (ii) allowing GP Practices (being potential engagers of your services) to view your profile when you; apply for a session, have worked a session, or are a part of bank;
- (iii) maintaining a record of your profile information and website use history so that GP Practices 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 and you will not be identifiable from the information collected;
- (v) maintaining your profile information;
- (vi) complying with any legal or regulatory requirements and to make the necessary disclosure under the requirements of any applicable law, regulation, direction, court order, guideline, circular or code which are applicable to us for the prevention of crime;
- (vii) to allow you to access and use our website or the app;
- (viii) to provide technical support;
- (ix) to provide you with the information you request from us;
- (x) to store information about your preferences, and so allow us to customise our website and the app according to your individual interests;
- (xi) to recognise you when you return to our Site;
- (xii) [if you are an app user, to recognise your location to enable the app to function by notifying you of vacancies nearby];
- (xiii) for equal opportunities monitoring;
- (xiv) making our Site and your use of it available to you;
- (xv) improving our Site to ensure that content is presented in the most effective manner for you and your device; and
- (xvi) assisting in our efforts to keep our Site safe.

(d) Where you use our Site to arrange locum work we will store and use your personal information for the purposes of processing payment to you (as payment agency for the GP Practice) in respect of services you have performed for the GP Practice.

(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 in respect of the services you provide to GP Practices.

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 GP Practices where you apply for a session or have worked a session.

- (g) If you first create your profile as part of a Staff Bank the information you include in your profile will be accessible [only] by the GP Practice who has set up that Staff Bank. When you set up your profile, you will also have access to Marketplace sessions.
- (h) If you first create your profile as part of a Collaborative Bank, your information will be shared [only] with GP Practices in that Collaboration. When you set up your profile, you will also have access to Marketplace sessions.
- (i) In certain circumstances a GP Practice may add your details to a Collaboration or Staff Bank [for use and access only by the relevant GP Practice and (as applicable) collaborating GP Practices]. Where this is the case the GP Practice and/or collaborating GP Practices will act as data controller and Lantum will process your personal information on their behalf. In these circumstances use of your personal data will be governed by the relevant GP Practice's privacy policy (ies).
- (j) 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 GP Practices in that Collaboration.
- (k) Special categories of data. Some of the personal information that we collect about you or which you provide to us may be special category of data. Special categories of data include information about physical and mental health, sexual orientation, racial or ethnic origin, political opinions, philosophical belief, trade union membership and biometric data. Any example of special category data would be a Locum's immunisation record and for certain clients we collect information on race, ethnic origin, sexual orientation, health and religion.
- (l) Disclosure and Barring Services ("DBS") certificate. Personal information we collect about you in relation to criminal convictions and offences (usually in the form of a DBS certificate) will be collected as required by law for a healthcare professional to be able to provide healthcare professional services in the UK.
- (m) Referees and emergency contacts: the personal information we collect about you where "you" are a referee or emergency contact. We collect basic contact details (such as name, title, address, email and tel) so that GP Practices can contact you for a reference or as an emergency contact for one of the Locums.

### 3.2 GP Practices

- (a) We, or third parties on our behalf, may collect and use any of the following information about GP Practice Managers:
  - (i) your name;
  - (ii) work contact information (phone number, postal address, mailing address, email address);
  - (iii) your job title;
  - (iv) any opinion or feedback you share with us regarding a Locum;
  - (v) details of any queries 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 Locums, for administration of your account with us, GP Practice loans, billing and debt collection purposes (where applicable));
  - (ii) enabling GP Practices 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 customise our website according to your individual interests;
- (vii) to recognise you when you return to our website;
- (viii) for improvement and maintenance of our website and preparing reports or compiling statistics in order to improve our goods and services. Such details will be anonymised as far as is reasonably possible and you will not be identifiable from the information collected.
- (ix) to send you certain communications (including by email or post) about our goods and services such as service announcements and administrative messages (for example, setting out 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 postal 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) **Technical 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 behaviour 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), methods used to browse away from the page, 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 receive enquiries from you through the Site about any of Lantum's Site services;
- (iii) for improvement and maintenance of our Site and to provide technical support for our Site;
- (iv) to ensure the security of our Site;
- (v) 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
- (vi) 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 and you will not be identifiable from the information 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 enquiries 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. If we do not have a contract with you, we may process your personal information for these purposes where it is in our legitimate interests for customer services purposes;
- (b) for internal corporate reporting, business administration, ensuring adequate insurance coverage for our business, ensuring the security of company facilities, research and development, and to identify and implement business efficiencies. We may process your personal information for these purposes where it is in our legitimate interests to do so;

- (c) to comply with any procedures, laws and regulations which apply to us – this may include where we reasonably consider it is in our legitimate interests or the legitimate interests of others to comply, as well as where we are legally required to do so;
- (d) to establish, exercise or defend our legal rights – this may include where we reasonably consider it is in our legitimate interests or the legitimate interests of others, as well as where we are legally required to do so.

### 3.5 Further processing

We will not use your personal information in any way that is incompatible with the purposes set out in this section 3. Please contact us using the details in section 12, if you want further information on the analysis we will undertake to establish if a new use of your personal information is compatible with these purposes.

## 4. Legal basis for use of your personal information

We consider that the legal bases for using your personal information as set out in this privacy policy are as follows:

### 4.1 Locums

- (a) Our use of your personal information is necessary for complying with our legal obligations (for example, to enable us to make payments to you as agent of the GP Practice);

Data needed	Reason	Length of time
Work history, GMC number, name and feedback	If the GMC (General Medical Council) require information for investigations	6 months
Name, GMC number and documents	If a practice requires documentation for a CQC (Care Quality Commission) inspection	5 years
Invoices	Financial records for HMRC	6 years
Name and email address	To respond to a question or complaint, or to show whether we gave you fair treatment (our support queries - historic emails/chats)	6 years

- (b) Where (a) does not apply, use of your personal information is necessary for our legitimate interests or the legitimate interests of others (for example, to ensure the security of our website). Our legitimate interests are:
  - (i) to develop and maintain an industry-relevant database of Locums and GP Practices to help connect Locums with work opportunities;
  - (ii) to provide a channel through which you may submit your details and find and apply for suitable engagements with GP Practices;
  - (iii) so that we enable contact between you and GP Practices;
  - (iv) to carry out market research for our internal use;
  - (v) for internal record keeping purposes;
  - (vi) run, grow and develop our business;
  - (vii) operate our Site [and the Lantum app];

- (c) The storage and use of your personal information allows you to be connected to GP Practices who may be of interest to you, now or in the future, and we do not believe that this storage and use will unduly prejudice your rights or freedoms.
- (d) If we rely on our (or another person's) legitimate interests for using your personal information, we will undertake a *balancing test* to ensure that our (or the other person's) legitimate interests are not outweighed by your interests or fundamental rights and freedoms which require protection of the personal information. You can ask us for information on this balancing test by using the contact details at section 12.
- (e) Information collected in relation to criminal convictions and offences (usually in the form of a DBS certificate) is in accordance with the authorisation of UK law and is a requirement for a healthcare professional to be able to provide healthcare professional services in the UK.
- (f) Where you use our Site to arrange locum work we will store and use your personal information for the purposes of processing payment to you (as payment agency for the GP Practice) in respect of services you have performed for the GP Practice. We do not believe that this storage and use of your personal information will unduly prejudice your rights or freedoms.
- (g) 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 in respect of the services you provide to GP Practices. Such processing will be for our legitimate interests so that we can provide services to you and our client. We do not believe that this storage and use of your personal information will unduly prejudice your rights or freedoms.
- (h) We may use your special categories of data (such as immunisation records or information on the following; race, ethnic origin, sexual orientation, health and religion) where you have provided your consent (which you may withdraw at any time after giving it, as described below).
- (i) If we rely on your consent for us to use your personal information in a particular way, but you later change your mind, you may withdraw your consent by contacting us at [privacyrequest@lantum.com](mailto:privacyrequest@lantum.com) and we will stop doing so. However, if you withdraw your consent, this may affect your use of the Site because most GP Practices will require your special categories of data such as health immunisations or some Providers may have individual requirements regarding your race, ethnic origin, sexual orientation, health and religion.

#### 4.2 GP Practices

- (a) Our use of your personal information is necessary for complying with our legal obligations (for example, to enable us to make payments to GPs as your payment agent);
- (b) Where (a) does not apply, use of your personal information is necessary for our legitimate interests or the legitimate interests of others (for example, to ensure the security of our website). Our legitimate interests are:
  - (i) to develop and maintain an industry-relevant database of Locums and GP Practices to help GP Practices fill their resourcing requirements;
  - (ii) to provide a channel through which you may find and engage suitable Locums;
  - (iii) to carry out market research for our internal use;
  - (iv) for internal record keeping purposes;
  - (v) run, grow and develop our business;
  - (vi) operate our Site;
- (c) This storage and use of your personal information allows you to be connected to Locums who may be of interest to you, now or in the future, and we do not believe that this storage and use will unduly prejudice your rights or freedoms.

- (d) If we rely on our (or another person's) legitimate interests for using your personal information, we will undertake a *balancing test* to ensure that our (or the other person's) legitimate interests are not outweighed by your interests or fundamental rights and freedoms which require protection of the personal information. You can ask us for information on this balancing test by using the contact details at section 12.
- (e) We may process your personal information in some cases for marketing purposes. You can unsubscribe or change your preferences at any time.
- (f) If we rely on your consent for us to use your personal information in a particular way, but you later change your mind, you may withdraw your consent by contacting us at [privacyrequest@lantum.com](mailto:privacyrequest@lantum.com) and we will stop doing so. However, if you withdraw your consent, this may affect your use of the Site.

#### 4.3 Visitors to our website

- (a) The use of your personal information is necessary for our legitimate interests or the legitimate interests of others (for example, to ensure the security of our website). Our legitimate interests are:
  - (i) to develop and maintain an industry-relevant database of Locums and GP Practices to help connect Locums with work opportunities and to help meet GP Practices' resourcing requirements;
  - (ii) to carry out market research for our internal use;
  - (iii) for internal record keeping purposes;
  - (iv) run, grow and develop our business;
  - (v) operate our website
- (b) The storage and use of your personal information allows you to use Lantum's services and we do not believe that this storage and use will unduly prejudice your rights or freedoms.
- (c) If we rely on our (or another person's) legitimate interests for using your personal information, we will undertake a *balancing test* to ensure that our (or the other person's) legitimate interests are not outweighed by your interests or fundamental rights and freedoms which require protection of the personal information. You can ask us for information on this balancing test by using the contact details at section 12.

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

5.1 We may share your personal information with our group companies where it is in our legitimate interests to do so 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).

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

- (a) Locum's full postcode;
- (b) how far the Locum is willing to travel from the Locum's full postcode to provide services to a GP Practice;
- (c) Locum's GMC number; and

This information will be used by Lantum, to flag via the platform when the Locum is available to do sessional work.

Lantum will share the following data with Locum Organiser (providing Locums with the ability to sync shifts they have found via the Lantum platform to their Locum Organiser diary, this will be opt in);

- (d) when a Locum agrees to provide services to a GP Practice, including dates and times, and any data in relation to updates to this shift or withdrawal of the Locum's services;
  - (e) if a Locum uploads or updates an invoice in Lantum;
  - (f) when the above invoice is paid or if the above invoice is cancelled.
- 5.3 We will also share your personal information with the following third parties or categories of third parties:
- (a) our other 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 optimisation of our website.
- 5.4 Any third parties with whom we share your personal information are limited (by law and by contract) in their ability to use your personal information for any purpose other than to provide services for us. We will always ensure that any third parties with whom we share your personal information are subject to privacy and security obligations consistent with this privacy policy and applicable laws.
- 5.5 We will also disclose your personal information to third parties:
- (a) where it is in our legitimate interests to do so to run, grow and develop our business:
    - (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 and conditions 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.
- 5.6 We may also disclose and use anonymised, aggregated reporting and statistics about users of our website or our goods and services for the purpose of internal reporting or reporting to our group or other third parties, and for our marketing and promotion purposes. None of these anonymised, aggregated reports or statistics will enable our users to be personally identified.
- 5.7 Save as expressly detailed above, we will never share, sell or rent any of your personal information to any third party without notifying you and, where necessary, obtaining your consent. If you have given your consent for us to use your personal information in a particular way, but later change your mind, you should contact us and we will stop doing so.
- 6. How long we store your personal information**
- We keep your personal information for no longer than necessary for the purposes for which the personal information is processed. The length of time we retain personal information for depends on the

purposes for which we collect and use it and/or as required to comply with applicable laws and to establish, exercise or defend our legal rights.

## 7. **Your rights**

7.1 You have certain rights in relation to your personal information. If you would like further information in relation to these or would like to exercise any of them, please contact us via email at [privacyrequest@lantum.com] at any time. You have the following rights:

(a) **Right of access.** You have a right of access to any personal information we hold about you. You can ask us for a copy of your personal information; confirmation whether your personal information is being used by us; details about how and why it is being used; and details of what safeguards are in place if we transfer your information outside of the European Economic Area ("EEA").

(b) **Right to update your information.** You have a right to request an update to any of your personal information which is out of date or incorrect.

(c) **Right delete your information.** You have a right to ask us to delete any personal information which we are holding about you in certain specific circumstances. You can ask us for further information on these specific circumstances by contacting us using the details in section 12.

We will pass your request onto other recipients of your personal information unless that is impossible or involves disproportionate effort. You can ask us who the recipients are using the contact details in section 12.

(d) **Right to restrict use of your information:** You have a right to ask us to restrict the way that we process your personal information in certain specific circumstances. You can ask us for further information on these specific circumstances by contacting us using the details in section 12.

We will pass your request onto other recipients of your personal information unless that is impossible or involves disproportionate effort. You can ask us who the recipients are using the contract details in section 12.

(e) **Right to stop marketing:** You have a right to ask us to stop using your personal information for direct-marketing purposes. If you exercise this right, we will stop using your personal information for this purpose.

(f) **Right to data portability:** You have a right to ask us to provide your personal information to a third party provider of services.

This right only applies where we use your personal information on the basis of your consent or performance of a contract; and where our use of your information is carried out by automated means.

(g) **Right to object.** You have a right to ask us to consider any valid objections which you have to our use of your personal information where we process your personal information on the basis of our or another person's legitimate interest.

7.2 We will consider all such requests and provide our response within a reasonable period (and in any event within one month of your request unless we tell you we are entitled to a longer period allowed by applicable law). Please note, however, that certain personal information may be exempt from such requests in certain circumstances, for example if we need to keep using the information to comply with our own legal obligations or to establish, exercise or defend legal claims.

7.3 If an exception applies, we will tell you this when responding to your request. We may request you provide us with information necessary to confirm your identity before responding to any request you make.

## 8. **Marketing**

8.1 We may collect and use your personal information for undertaking marketing by email telephone and post.

8.2 We may send you certain marketing communications (including electronic marketing communications to existing customers) if it is in our legitimate interests to do so for marketing and business development purposes.

8.3 However, we will obtain your consent to direct marketing communications where we are required to do so by law and if we intend to disclose your personal information to any third party for such marketing.

8.4 If you wish to stop receiving marketing communications, you can unsubscribe, change your marketing preferences or contact us by email at [privacyrequest@lantum.com](mailto:privacyrequest@lantum.com).

## 9. **Risks and how we keep your personal information secure**

9.1 The main risk of our processing of your personal information is if it is lost, stolen or misused. This could lead to your personal information being in the hands of someone else who may use it fraudulently or make public information that you would prefer to keep private.

9.2 For this reason, Lantum is committed to protecting your personal information from loss, theft and misuse. We take all reasonable precautions to safeguard the confidentiality of your personal information, including through use of appropriate organisational and technical measures. We have undertaken an internal audit of our hardwares, ensuring everyone has secure password protections, encryption and malware systems on laptops, 2 step authentication on emails and our system. If we store any hard copies of personal data this is in a secure lockable cupboard. No data is stored on laptops for longer than necessary, screens are locked when staff members are away from their desk. Any printed materials with personally identifiable data is shredded within 1 week of use, for example CVs. Staff have had training and we have a training pack for onboarding new staff members. Our building is key card access with 24-hour security.

9.3 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. Once we have received your personal information, we will use strict procedures and security features to prevent unauthorised access to it.

9.4 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.

## 10. **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.

## 11. **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.

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

12.1 If you have any queries or complaints about our collection, use or storage of your personal information, or if you wish to exercise any of your rights in relation to 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.

- 12.2 In accordance with Article 77 of the General Data Protection Regulation, you may also make a complaint to the Information Commissioner's Office, or the data protection regulator in the country where you usually live or work, or where an alleged infringement of the General Data Protection Regulation has taken place. Alternatively, you may seek a remedy through the courts if you believe your rights have been breached.

The practices described in this privacy policy statement are current as of 12 March 2019.