# **Privacy Policy**

Privacy Notices for users in accordance with the EU's General Data Protection Regulation ('GDPR')

Privacy Policy as of February 2020.

Your privacy is of the utmost of importance. We at CliniShift Software Services Ltd ("CliniShift") believe that your data should be protected, processed responsibility and lawfully used.

CliniShift recognises the right a natural person to privacy relating to their data. Users are presented a clear, easy-to-read notices when signing up to our mobile Application. Notices highlight what data CliniShift collects, how it processes the data, and the modification of data.

CliniShift's legitimate interest in data processing provides users with a means of working overtime rather than through alternative methods such as an Agency. The minimum amount of data we require for this interest is as follows:

- 1. Full name, for identification by employer administrative staff.
- 2. Email, used for sign in, and urgent updates relating to shifts.
- 3. Telephone number, used for urgent updates relating to shifts.

Data is only processed for the sole purposes of assisting users with the booking of shifts. The processing of data does not override the rights of the individual and is not detrimental to the individual.

#### Summary

#### What information do we collect about you?

The CliniShift mobile application collects the following data, personal data, contact data and shift data.

Personal data is collected:

- Full Name.
- Profile Picture (Optional).

Contact data:

- Telephone Number.
- Email Address.

#### Shift data:

- Shift date and time.
- Location of shift.
- Employer/Work Zones that you join through the app, and your employment occupation with that employer.

• We may also gather additional information where required by that employer, such as Employment Start Date

#### How will we use your data?

CliniShift uses your personal information so that employer's administration staff can identify you for a shift, and to notify you of events/information relating to those shifts.

# Who do we share your data with?

CliniShift does not sell or transfer your data to third-parties. Your data will be accessible by the employer for which you are working or have worked.

## How long is my data held?

Your data will be held for as long deemed necessary by the employer. If you wish to request explicit early removal, please contact <u>security@clinishift.com</u>

## How can I rectify my data?

You may rectify most data we hold through the CliniShift mobile application. If you are having difficulty removing or amending data, you may email <u>security@clinishift.com</u>.

The CliniShift mobile app requests for explicit consent to the above in order to create your account.

## How can I find out more information?

If you have any questions, concerns or would like more information regarding your data process, please do not hesitate to contact us, at info@clinishift.com

# Your Rights

In Accordance with GDPR, you have the following rights in regards to the data we hold.

You have the right to request information stored by us about personal data which we hold on you. To understand the purpose of that data and how long the data will be stored for. To request a copy of the data in a common file format. Rectify or erase data. File a complaint regarding our data processing procedures.

#### Subject Access Requests

Our policy for handling SARs is the following:

1. Initiate a SARs request by contacting access-request@clinishift.com.

2. A member of our team will be delegated to the handling of the request.

3. The overseeing staff member will reply, indicating they have received the SARs request and an estimation time of completion.

4. You will receive your data in a machine readable format.

Priority will be given to all SARs requests and handled within the allocated thirty days.

Data will be provided in a CSV format, a machine readable format that may be opened in any text editor or Microsoft Excel.

# Deletion and Rectification

Users names cannot be removed through the App. We require a name to remain on file for an employer to associate a shift with an individual

Requests for the deletion of data may be sent to <u>security@clinishift.com</u>. We will investigate the possibility of deletion with the Data Controller. In the event that a Data Controller requires the full name to be on file, CliniShift will remove all other data. At this point the users account will be removed, and they will be unable to access the app.

Telephone and email data may be rectified or removed through the CliniShift mobile App. An email is required for login purposes. If you require removal of your email address, your account will become inactive. A request to <a href="mailto:support@clinishift.com">support@clinishift.com</a> will be required to reinstate the account.

Users are informed on signup and on their profile page of the processing related to their data and the policy of amendments. CliniShift does not use profile data for marketing purposes without explicit consent.

Decisions are at the manual discretion of employer administration staff.

## Data Accuracy

Personal data is used for the purposes of which it was originally collected, this is to facilitate the processing and "booking" of shifts within the CliniShift mobile application.

CliniShift have determined that the minimum amount of data we require to function is:

- Name
- Email
- Mobile Telephone Number

Data may be updated, or rectified by each data subject through the CliniShift mobile application. Changes made through the mobile app, are instantaneous.

In the event that a data subject cannot use the CliniShift mobile application to rectify data. Rectifications may be emailed security@clinishift.com, there may be a small delay in the processing of these requests.

Users who have signed up, but not used the CliniShift mobile application within six months will be removed from the system.

CliniShift acts as a data processor. The employing employers act as the data controller.

When erasing data we manually check for existence of data before and after the deletion. Manual intervention allows confirmation all data was disposed of correctly.

Data may be duplicated within the CliniShift database backups. These backups are held for a period of twenty-five days. After twenty-five days, each backup is deleted.

Data is duplicated for a maximum period of twenty-five days after a rectification is actioned.

# Data Transparency

Users on the CliniShift mobile application are presented with, on signup, and on their profile pages, buttons which clearly, concisely and transparently outline the reasons for processing their data and policies around it's retention and rectification.

Personal data is collected directly from there.

We encourage each data subject, throughout our mobile app to read our stance on data protection.

Any documentation outlining an rights is written in a clear, easy to read and accessible format.

# Data Security

Security at CliniShift is taken very seriously. CliniShift and employees understand the responsibility required of them in processing users personal data.

Risk assessments are scheduled quarterly, allowing CliniShift to constantly and consistently monitor it's security practices and procedures.

Technical measures have been put into place which mitigate against common attack scenarios.