

**GDPR Website Privacy Notice**

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<b>Policy Contact</b>	Matthew Betteridge
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<b>Target Audience</b>	Staff
<b>Approved by</b>	OneCall24 Policy Team

This Document defines OneCall24 Limited's Website Privacy Notice and is to be used in conjunction with One Call 24's Data Privacy and Data Retention Policies to adhere to the UK GDPR and Data Protection Act of 2018.

The following text should be displayed on One Call 24's public website: <https://onecall24.co.uk/>

**Privacy Notice**

This is the privacy notice of OneCall24 Limited (herein referred to as "One Call 24", "we", "our", or "us"). We are registered as company number 09732799 in England and Wales. Our registered office is at 239 Old Marylebone Road, London, NW1 5QT.

As a trusted provider of healthcare professionals, we take our legal obligations very seriously. We respect your right to privacy and aim to be transparent at all times about our treatment of your information.

**1. Introduction**

This is a notice to inform you of our policy about all information that we record about you. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers information that could identify you ("personal information") and information that could not. In the context of the law and this notice, "process" means collect, store, transfer, use or otherwise act on information.

If you do not agree with the terms of this Privacy Notice, you should not continue to use our website.

We take seriously the protection of your privacy and confidentiality. We understand that all visitors to our website are entitled to know that their personal data will not be used for any purpose unintended by them and will not accidentally fall into the hands of a third party.

We undertake to preserve the confidentiality of all information you provide to us, and hope that you reciprocate.

Our policy complies with UK law accordingly implemented, including that required by the UK GDPR and Data Protection Act 2018.

The law requires us to tell you about your rights and our obligations to you in regard to the processing and control of your personal data. Details of your rights and our obligations are set out below within this Privacy Notice, in accordance with UK GDPR requirements. For general guidance on privacy rights, additional information is also available at [www.knowyourprivacyrights.org](http://www.knowyourprivacyrights.org).

Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website.

## **2. The bases on which we process information about you**

The law requires us to determine under which one or more defined lawful bases we process different categories of your personal information, and to notify you of the basis for each category.

If a basis on which we process your personal information is no longer relevant, then we shall immediately stop processing your data.

If the basis changes then if required by law, we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

### **2.1. Information we process because we have a contractual obligation with you**

When you create an account on our website, buy a product or service from us, or otherwise agree to our terms and conditions, a contract is formed between you and us.

In order to carry out our obligations under that contract we must process the information you give us. Some of this information may be personal information.

We may use it in order to:

- Verify your identity for security purposes.
- Sell products to you.
- Provide you with our services.
- Provide you with suggestions and advice on products, services and how to obtain the most from using our website.

We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract.

Additionally, we may aggregate this information in a general way and use it to provide class information, for example to monitor our performance with respect to a particular service we provide. If we use it for this purpose, you as an individual will not be personally identifiable.

We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract, after which it will be retained or securely deleted in accordance with our GDPR Data Retention Policy.

### **2.2. Information we process with your consent**

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our business, including job opportunities and our products and services, we may process limited information where a lawful basis applies to process information that may be personal information.

Wherever possible, we aim to obtain your explicit consent to process this information, for example, by asking you to agree to our use of cookies.

We do not rely on implicit consent. Routine communications initiated by you, such as email enquiries, are processed on the basis of legitimate interests rather than consent.

Except where you have consented to our use of your information for a specific purpose, we do not use your information in any way that would identify you personally. We may aggregate it in a general way and use it to provide class information, for example to monitor the performance of a particular page on our website.

If you have given us explicit permission to do so, we may from time to time pass your name and contact information to selected associates where appropriate and under appropriate contractual safeguards, who we consider may provide services or products you would find useful.

We continue to process your information on this basis until you withdraw your consent, or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us by sending an email to [GDPR@onecall24.co.uk](mailto:GDPR@onecall24.co.uk). However, if you do so, you may not be able to use certain aspects of our services further.

### **2.3. Information we process for the purposes of legitimate interests**

We may process information on the basis that there is a legitimate interest, either to you or to us, of doing so.

Where we process your information on this basis, we do so only after having given careful consideration to:

- Whether the same objective could be achieved through other means.
- Whether processing (or not processing) might cause you harm.
- Whether you would expect us to process your data, and whether you would, in the round, consider it reasonable to do so.

For example, we may process your data on this basis for the purposes of:

- Record-keeping for the proper and necessary administration of our business.
- Responding to unsolicited communication from you to which we believe you would expect a response.
- Protecting and asserting the legal rights of any party.
- Insuring against or obtaining professional advice that is required to manage business risk.
- Protecting your interests where we believe we have a duty to do so.

### **2.4. Information we process because we have a legal obligation**

We are subject to the law like everyone else. Sometimes, we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

This may include your personal information.

## **3. Specific uses of information you provide to us**

### **3.1. Information provided relating to job applications, registration and employment**

If you send us information in connection with a job application, we will retain it for defined periods in accordance with our GDPR Data Retention Policy, and only for as long as necessary for recruitment purposes, unless explicit consent is obtained for longer retention.

If we employ you or register you so you can work at any of our client's, we collect information about you and the work you do from time to time. This information will be used only for purposes directly relevant to your

employment or engagement. After your employment or registration has ended, we will keep your file for a defined retention period in accordance with our GDPR Data Retention Policy before destroying or deleting it.

### **3.2. Information provided on the understanding that it will be shared with a third party**

Our website allows you to post information with a view to that information being read, copied, downloaded, or used by other people.

Examples include:

- Referring a friend.
- Posting a message or tagging content after clicking on a link to a third-party website (e.g. Facebook, LinkedIn, Twitter, YouTube).
- Clicking on an icon next to another visitor's message to convey your agreement, disagreement or thanks after clicking on a link to a third-party website (e.g. Facebook, LinkedIn, Twitter, YouTube).

In posting personal information, it is up to you to satisfy yourself about the privacy level of every person who might use it. We do store it, but we will only use such information in a manner consistent with this Privacy Notice and applicable data protection legislation.

Once your information enters the public domain, we have no control over what any individual third party may do with it. We accept no responsibility for their actions at any time.

Provided your request is reasonable and there is no legal basis for us to retain it, we will consider your request and may agree to your request to delete personal information that you have posted. You can make a request by sending us an email at [GDPR@onecall24.co.uk](mailto:GDPR@onecall24.co.uk).

### **3.3. Complaints regarding content on our website**

We attempt to moderate new website content, but we are not always able to do so as soon as that content is published.

If you complain about any of the content on our website, we shall investigate your complaint. If we feel it is justified or if we believe the law requires us to do so, we shall remove the content while we investigate.

Free speech is a fundamental right, so we have to make a judgment as to whose right will be obstructed: yours, or that of the person who posted the content that offends you.

If we reasonably consider a complaint to be vexatious, manifestly unfounded or excessive, we may limit or refuse further correspondence in accordance with data protection legislation.

### **3.4. Information relating to payments and / or charges**

Information relating to payment or charge arrangements is never taken by us or transferred to us through our website.

We store this information at your request the first time you provide it to us in order to make repeat use of our services more convenient.

We also store it to help us prevent fraud and restrict access to authorised staff only for your protection, and retain it only for as long as required for these purposes and in line with our GDPR Data Retention Policy.

### **3.5. Information relating to communications with our support team**

When you contact us, whether by telephone, through our website or by e-mail, we collect the data you have given to us in order to reply with the information you need.

We record your request and our reply in order to increase the efficiency of our organisation.

We keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high-quality service, retaining it only for as long as necessary for these purposes.

### **3.6. Complaining**

When we receive a complaint, we record all the information you have given to us.

We use that information to resolve your complaint.

If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We will only share such information where necessary, proportionate, and lawful, and only to the extent required to investigate and resolve the complaint.

We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

### **3.7. Affiliate and business partner information**

This is information given to us by you in your capacity as an affiliate of us or as a business partner.

It allows us to recognise visitors that you have referred to us, and to credit to you commission due for such referrals. It also includes information that allows us to transfer commission to you.

The information is not used for any other purpose.

We undertake to preserve the confidentiality of the information and of the terms of our relationship.

We expect any affiliate or partner to agree to reciprocate this policy and to comply with applicable data protection legislation.

## **4. Use of information we collect through automated systems when you visit our website**

### **4.1. Cookies**

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit any website. They allow information gathered on one web page to be stored until it is needed for use on another, allowing a website to provide you with a personalised experience and the website owner with statistics about how you use the website so that it can be improved.

Some cookies may last for a defined period of time, such as one day or until you close your browser. Others last indefinitely.

Your web browser should allow you to delete any you choose. It also should allow you to prevent or limit their use.

Our website uses cookies. They are placed by software that operates on our servers, and by software operated by third parties whose services we use.

When you first visit our website, we ask you whether you wish us to use cookies. If you choose not to accept them, we shall not use them for your visit other than those cookies that are strictly necessary for the operation of the website, except to record that you have not consented to their use for any other purpose.

If you choose not to use cookies or you prevent their use through your browser settings, some features and functionality of our website may be limited.

We use cookies in the following ways:

- To track how you use our website.
- To record whether you have seen specific messages we display on our website.
- To record your answers to surveys and questionnaires on our site while you complete them

#### **4.2. Personal identifiers from your browsing activity**

Requests by your web browser to our servers for web pages and other content on our website are recorded.

We record information such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution.

We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.

If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to our website. Where this information constitutes personal data, it is processed on the basis of legitimate interests or consent (where required), in line with UK GDPR and our GDPR Data Privacy Policy.

#### **4.3. Our use of re-marketing**

Re-marketing involves placing a cookie on your computer when you browse our website in order to be able to serve to you an advert for our products or services when you visit some other website.

We may use a third party to provide us with re-marketing services from time to time. If so, then only where you have provided your explicit consent to the use of non-essential cookies, you may see advertisements for our products and services on other websites.

### **5. Disclosure and sharing of your information**

#### **5.1. Information we obtain from third parties**

Although we do not disclose your personal information to any third party (except as set out in this notice), we sometimes receive data that is indirectly made up from your personal information from third parties whose services we use.

No such information is personally identifiable to you or is otherwise anonymised or aggregated before receipt.

#### **5.2. Credit references**

To assist in combating fraud, we share information with credit reference agencies, so far as it relates to clients or customers who instruct their credit card issuer to cancel payment to us without having first provided an acceptable reason to us and given us the opportunity to refund their money, where such sharing is lawful and proportionate.

#### **5.3. Data may be processed outside the European Union**

Our website is hosted in the United Kingdom.

We may also use outsourced services in countries outside the United Kingdom from time to time in other aspects of our business.

Accordingly, data obtained within the UK or any other country could be processed outside the United Kingdom.

For example, some of the software our website uses may have been developed in the United States of America or in Australia.

We use the following safeguards with respect to data transferred outside the United Kingdom:

- Data protection clauses approved under UK GDPR, including the UK International Data Transfer Agreement or the UK Addendum to the EU Standard Contractual Clauses, where required.

## **6. Access to your own information**

### **6.1. Access to your personal information**

At any time, you may review or update personally identifiable information that we hold about you, by sending us a Subject Access Request (SAR).

To obtain a copy of any information that is not provided on our website you may send us a request by emailing us at [GDPR@onecall24.co.uk](mailto:GDPR@onecall24.co.uk). We may request additional information to verify your identity before responding to your request.

After receiving the request, we will tell you when we expect to provide you with the information, in accordance with statutory time limits and free of charge, unless a request is manifestly unfounded or excessive.

### **Removal of your information**

If you wish us to remove personally identifiable information we hold about you, you may send us a request by emailing us at [GDPR@onecall24.co.uk](mailto:GDPR@onecall24.co.uk).

This may limit the service we can provide to you.

### **6.2. Verification of your information**

When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

## **7. Other matters**

### **7.1. Use of site by children**

We do not sell products or provide services for purchase by children, nor do we market to children.

If you are under 18, you may use our website only with consent from a parent or guardian.

We collect data about all users of and visitors regardless of age, and we anticipate that some of those users and visitors will be children.

We take reasonable steps to ensure that any on-site marketing or content is appropriate and compliant with applicable data protection and safeguarding requirements.

## **7.2. How you can complain**

If you are not happy with our privacy policy or if you have any complaint, then you should tell us by email. Our address is [GDPR@onecall24.co.uk](mailto:GDPR@onecall24.co.uk).

If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office. This can be done at <https://ico.org.uk/concerns/>

## **7.3. Retention period for personal data**

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

- To provide you with the services you have requested.
- To comply with other law, including for the period demanded by our tax authorities.
- To support a claim or defence in court

Retention periods are defined and applied in accordance with our GDPR Data Retention Policy.

## **7.4. Compliance with the law**

Our privacy policy has been compiled to comply with applicable data protection law within the United Kingdom.

If you think it fails to satisfy the law of your jurisdiction, we should like to hear from you.

However, ultimately it is your choice as to whether you wish to use our website.

## **7.5. Review of this privacy policy**

We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records.

If you have any question regarding our privacy policy, please contact us.

### **Review**

This policy statement will be reviewed annually as part of our commitment to upholding professional standards. It may be altered from time to time in the light of legislative changes, operational procedures or other prevailing circumstances.