

Atlantis Healthcare Privacy Notice

Atlantis Healthcare respects your right to privacy. This Privacy Notice explains who we are, how we collect, share and use personal data about you, and how you exercise your privacy rights. It applies to all individuals who access our website at www.atlantishealthcare.com (“Website”), engage our services or use our products (“Services”), participate in research or marketing initiatives or who participate in our recruitment activities.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. **This privacy notice supplements the other notices and is not intended to override them.**

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1. Important Information

Who are we?

Atlantis Healthcare is made up of different legal entities, details of which can be found [here](#). This privacy notice is issued on behalf of the Atlantis Healthcare Group of companies "Atlantis Healthcare" so when we mention Atlantis Healthcare, "we", "us" or "our" in this privacy notice, we are referring to the relevant company in the Atlantis Healthcare Group responsible for processing your data. Atlantis Healthcare Group Limited is the controller and responsible for this website.

How to contact us

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice.

If you have any questions about this privacy notice, including any requests to exercise your legal rights or concerns about our use of your personal information, please email us at privacy@atlantishealthcare.com.

Alternatively contact details of our offices can be found here <https://atlantishealthcare.com/en-us/contact-us>

If you are a visitor to our Website, the data controller of your personal information is Atlantis Healthcare Group.

If you are a client of our Services or a candidate seeking employment at Atlantis Healthcare, the data controller of your personal information will be the relevant Atlantis Healthcare entity with whom you have engaged. Contact details for all Atlantis Healthcare entities are available on our website <https://atlantishealthcare.com/en-us/contact-us>

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. What personal information do we collect when you visit our Website and why?

The personal information we collect about you when you visit our website broadly falls into the following categories:

Information you provide voluntarily.

We collect personal information that you provide voluntarily through our Website, for example when you sign up to receive our white papers. The information we collect about you may include some or all of the following:

- Name and job title;
- Company or organisation;
- Contact information, including email address, postal address, and telephone number(s);
- Other information relevant to surveys or similar research;
- Marketing and communication preferences;
- Information pertinent to fulfilling our Services to you; and
- Any other personal information that you voluntarily choose to provide us.

If we ask you to provide any other personal information not described above, the personal information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point that you are asked to provide your personal information.

Our Website is not intended for children under the age of 16 and we do not knowingly collect data relating to children.

Information that we collect automatically

When you visit our Website, we may collect personal information automatically from your devices.

Specifically, the information we collect automatically may include information like your IP address, device type, unique device identification number, browser type, broad geographic location (e.g. country or city location) and other technical information. We may also collect information about how your device has interacted with our Website, including pages accessed and links clicked.

Collecting this information enables us to better understand the visitors who come to our Website, where they come from, and what content on our Website is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our Website to our visitors.

Some of this information may be collected using cookies and similar tracking technology, as explained further in our [Cookie Notice](#). You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

3. What personal information do we collect when you engage our Services and why?

When you engage us to provide you with Services, we collect and use personal information which is necessary for the performance of those Services.

The majority of the personal information we collect and use to provide our Services is supplied voluntarily by (or collected by us from third party sources at the request of) our clients. This may include:

- Basic information such as your name, the company you work for, and your position;
- Contact information such as your postal address, email address and telephone number(s);
- Financial information, such as payment related information; and
- Any other personal information relating to you or other third parties which you may provide to us for the purpose of receiving our Services.

We use this information to facilitate the provision of our Services to you, the client. In addition, we will process identification and background information as part of our business acceptance, finance, administration and marketing processes, including anti-money laundering, conflict, reputational and financial checks, and to fulfil any other legal or regulatory requirements to which we may be subject.

As part of our processing of information for marketing purposes we may collect information from responses provided to marketing campaigns via email. This information would be used for internal analytics purposes and to improve the quality, relevance and compliance of our marketing.

4. What information do we collect when you engage in recruitment activities?

We collect information from and about candidates in connection with available employment opportunities at Atlantis Healthcare. This information may include CVs, identification documents, academic records, work history, employment and references.

We use your personal information to match your skills, experience and education with the specific roles offered by us. This information is passed to the relevant hiring managers and persons involved in the recruitment process to decide whether to invite you for interview. We will collect further information from you if you are invited to the interview (or equivalent) stage and onwards.

In connection with our recruitment activities, we may also collect special categories of personal information from candidates where we have an employment law obligation to do so, the information is relevant to their future working environment at Atlantis Healthcare or the future provision of employment benefits, or with the individual's explicit consent. For example, we may need to collect information about a candidate's disabilities in order to provide a suitable working environment for that candidate if they are successful in their application. We may also need to conduct criminal background checks for some candidates, for example finance personnel, to assess their eligibility to work at Atlantis Healthcare. We may also ask you to provide diversity information

about your race/ethnicity and sexual orientation for diversity monitoring purposes, although the provision of this information will be entirely voluntary.

We may collect personal information about candidates from the following sources:

- Directly from you – for example, information that you have provided when applying for a position directly through our website;
- From recruitment agencies – for example, when a recruitment agency contacts us to identify you as a potential candidate;
- Through publicly available sources online – for example, where you have a professional profile posted online (e.g. on your current employer's website, or on a professional networking site like LinkedIn); and
- By reference or word of mouth – for example, through a referred from former employee/employer or from a referee you have identified.

For more details please see our HR Privacy Notice [here](#).

5. Legal basis for processing personal information

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data for at least one of the following circumstances:

- where we have your consent to do so;
- where we need the personal information to perform a contract with you (for example, when providing our Services or for employment);
- where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms;
- where we have a legal or regulatory obligation to do so.

Where we need to collect personal data by law and you fail to provide that data when requested we may have to cancel a product or service you have with us or may not be able to enter into a contract with you to provide a product or service but we will notify you if this is the case at the time.

6. Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required and permitted by law.

7. When and with whom might we share your personal information?

We may have to share your personal data with the following categories of recipients for the purposes set out in the table in section 5 above:

- To the Atlantis Healthcare group of companies, as well as third party services providers and partners who provide data processing services to us (for example, for Website visitors who subscribe to our blogs, our blog e-mail delivery provider; our website spam security service; or, if you are a candidate, from recruitment agencies we have engaged);
- To a potential buyer (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Notice; and
- To a person you have given us your consent to disclose to.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We will not share your personal data with any company outside the Atlantis Healthcare group of companies for marketing purposes.

8. Disclosures of your personal data

In certain circumstances, we may disclose your personal information with competent law enforcement bodies, regulators, government agencies, courts or other third parties without your knowledge or consent for the following purposes:

- The prevention or detection of crime;
- The apprehension or prosecution of offenders;
- The assessment or collection of a tax or duty;
- By the order of a court or by any rule of law

9. International transfers

Atlantis Healthcare operates in the UK, EU and around the world. This means that when we collect your personal information it may be processed in countries that may have data protection laws that are different to the laws of your country.

However, we have taken appropriate safeguards to require that the personal information we process will remain protected in accordance with this Privacy Notice when transferred internationally, including when processed internationally by our third party service providers and partners.

If you have questions about, or need further information concerning, international data transfers, please send an email to privacy@atlantishealthcare.com

10. How does Atlantis Healthcare keep my personal information secure?

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

11. Data retention

We will retain personal data we collect from you for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), we will securely store your personal information and isolate it from any further processing until deletion is possible.

If you have questions about, or need further information concerning, our data retention periods, please send an email to privacy@atlantishealthcare.com

12. Your legal rights

We respond to all requests received from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. Note, however, that we may not always be able to comply with your request for specific legal reasons which will be notified to you, if applicable, at the time of your request.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

- If you wish to access, correct, update or request deletion of your personal information, you can do so at any time by sending an email to privacy@atlantishealthcare.com
- You can object to the processing of your personal information, ask us to restrict processing of

your personal information or request portability of your personal information. You can exercise these rights by contacting us by email at privacy@atlantishealthcare.com;

- You have the right to opt-out of marketing communications we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please email privacy@atlantishealthcare.com;
- Similarly, if we have collected and process your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent; and
- You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.
 - Contact details for data protection authorities in the European Economic Area, Switzerland and certain non-European countries (including the US and Canada) are available [here](#)
 - Contact details for the data protection authority in the UK are available [here](#)
 - Contact details for the data protection authority in New Zealand are available [here](#)
 - Contact details for the data protection authority in Australia are available [here](#)
 - The USA has no single national data protection authority. The FTC has jurisdiction over most commercial entities and has authority to issue and enforce privacy regulations in specific areas (for example telemarketing, commercial email, and children's privacy) and to take enforcement action to protect consumers against unfair or deceptive trade practices, including materially unfair privacy and data security practices. Many state attorneys general have similar enforcement authority over unfair and deceptive business practices, including failure to implement reasonable security measures and violations of consumer privacy rights that harm consumers in their states. The California Attorney General has the authority to enforce the CCPA and most California consumer privacy laws. In addition, a wide range of sector-specific regulators, particularly those in the healthcare, financial services, telecommunications and insurance sectors, have authority to issue and enforce privacy and security regulations, with respect to entities under their jurisdiction.

13. Opting out

You can ask us or third parties to stop sending you messages by contacting us [here](#) at any time.

Last Updated: March 2021