

Rostr Privacy Policy

What personal information does Rostr collect about me and how?

Personal information (or personal data) is any information which identifies you personally whether directly (for example, your name) or indirectly (for example, information about your use of our Service)

Our Privacy Policy describes what personal information we collect about you, how and why we collect and use it, who has access to it and what your privacy rights are - please review it carefully.

When does this Privacy Policy apply to me?

This Privacy Policy applies to all personal information collected by Rostr Technologies Limited (Rostr) and our affiliates, through the operation of our "Matching Service"

Who is responsible for my personal information?

Rostr Technologies Ltd (registered in England and Wales with company number 11625670 and registered address 71-75 Shelton Street, Covent Garden, London WC2H 9JQ) is the "data controller" of the personal information that is collected about you when you use our Service. This means that we control the ways in which your personal information is collected and determine how and why such personal information is used for the purposes of applicable data protection law.

Information you give us

We collect the following personal information from you when you register for an Account

Identity and contact information: We will collect your name, title, date of birth, gender, nationality, home address, email address, telephone number, passport number, national insurance number, Royal College of Nursing Pin number (for registered nurses) employment history, references and DBS certificate number. We may also collect some of this information if you;

- sign up to receive marketing communication
- enter any of our promotions, surveys or questionnaires in which we may also collect your social media handle(s)
- contact or correspond with us about the Service (or any component of it)

Your Bank Details: We collect your bank details to facilitate the payment of your invoices

Records of completed shifts: We will keep a record of your completed shifts including details of the employer, the date, time, duration and invoice value.

Correspondence and feedback: We collect any additional personal information that you may provide to us from time to time when you complete a survey or questionnaire or contact us by email, letter, telephone or through our website.

Marketing and communication preferences: We collect information regarding your marketing and communication preferences.

Information we collect from other sources

- **Cookies and similar technologies:** When you visit our website we use cookies and similar technologies such as web beacons and pixel tags to automatically collect information about your browsing activity and use of the Service
- **Social Media:** If you mention Roostr or Roostr related information in a posting on any social media platform such as Facebook or Twitter we may collect publicly available information about your post including your name, social media handle, your location, the date and time of your post. We will only collect data that the social media provider has expressly permitted us to receive as a result of your privacy settings on the social media platforms.

For what purposes does Roostr use my personal information?

To confirm your identity

We use your name, address and date of birth and gender to run an on-line identity check.

To confirm your right to work

We may run a right to work check using a scan of your passport.

To check your DBS

We will verify your DBS certificate against the DBS Update service which includes entering your name and date of birth and certificate number to the on-line DBS portal.

To check your RCN membership

We will verify Registered Nurses PIN number with the NMC 'Search the Register' which involves entering your PIN number and name to the NMC on-line portal.

To enable our "Matching Service"

We use your personal information to process your account, undertake statutory checks, notify you of shifts that match your job alert preferences" (through our "Matching Service") provide your Employer with your User Profile and process invoicing for completed Shifts or Assignments all in accordance with our Terms and Conditions.

To manage your relationship with us

We use your identity and contact information to manage our relationship with you in connection with our Service

To communicate with you on social media

If you include Roostr related information in a social media posting, we may use the publicly-available information that you post to communicate with you regarding the post.

To run competitions and contests

If you choose to enter a competition, contest or survey that we run, including those that we run on third party sites, we need to use your identity and contact information and any other personal information that you provide at the time of entry so that we can manage the competition or contest (as applicable).

To administer and protect our business and Website

We process your personal information in the course of administering our business and Website. This includes troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data. To use data analytics to improve our Website marketing and the services available through our Website We rely on the use of personal information to build a clearer picture of our customers both as a group and as individuals. We do this by

using cookies and similar technologies to capture and analyse your use of our Website, and your interaction with any marketing communications that we send to you.

To provide and improve Customer Care

We use your personal information to be able to provide and improve our Customer Care service. For example, we use the personal information we hold about you to help us address any enquiries or complaints you have made, or deal with any dispute which may arise in the course of us providing the Service to you.

What is the legal basis for Roostr's use of my personal information

The Health & Social Care Act 2008 requires health care providers to provide and deploy sufficient numbers of suitably qualified, competent, skilled and experienced staff to meet the needs of the people using their service and through the role of the Disclosure and Barring Service (DBS) to make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children.

Data protection law requires us to only process your personal information if there is a legal basis for us to do so as follows:

Consent

We process your personal information after obtaining your consent to do so for the purposes of:

- Confirming your identity
- Confirming your right to work in the UK
- Confirming and checking your DBS
- Recording your employment history
- Obtaining references
- Recording your training and qualifications
- Matching and connecting you with available shifts or assignments (our "Matching Service")
- Sending you marketing communication

Who does Roostr share my personal information with?

Employers After you have accepted a Shift or Assignment we will send a copy of your User Profile to the prospective Employer.

On the completion of your shift or assignment we will raise and issue an invoice on your behalf to the Employer for payment

Third Party service providers For the purpose of operating our business, we will need to provide some of your personal information including name, address, date of birth and gender to Experian who will complete an "identity" check. We reserve the right to carry out a right to work check with Experian for which we would provide a scan of your passport. For the purpose of applicable data law they act as "data processors" on our behalf.

How does Roostr keep my information secure?

We have put in place a variety of security measures to protect the personal information we collect about you from being accidentally lost, used or accessed in an unauthorised manner, altered or disclosed. In addition, we limit access to your personal information to employees, agents, contractors and other third parties who have a business need to know for the purposes set out in this Privacy Policy. They are required to only process your personal information in accordance with our instructions and are subject to a duty of confidentiality.

How do links from Roostr to other sites or Apps affect me?

We may provide links from our Website to other websites and applications operated by third parties. These links are provided only for your convenience and intended to add value to your visit. However, we do not have control over these websites and applications, which are independent from Roostr and are subject to separate privacy policies and terms and conditions.

For how long does Roostr keep my Personal Information?

We retain your personal information for no longer than is necessary for the purpose(s) for which it was provided in accordance with this Privacy Policy. What this means in practice will vary between different categories of personal information. When determining the relevant retention periods, we take into account factors including:

- legal obligation(s) under applicable law to retain information for a certain period of time
- potential or actual disputes.
- guidelines issued by relevant data protection authorities.

Otherwise, we securely delete your personal information from our systems when it is no longer needed.

What are my Privacy rights?

You have the following rights with regard to your personal information

Right to be informed

You have the right to be provided with clear, transparent and easily understandable information about how we use your personal information and your rights. This is why we are providing you with the information in this Privacy Policy.

Right of access

You have the right to obtain access to the personal information that we hold about you

Right to rectification

You have the right to request that we rectify any personal information that we hold about you if it is inaccurate or incomplete.

Right to erasure

This is also known as ‘the right to be forgotten’ and, in simple terms, enables you to request the deletion or removal of the personal information that we hold about you. This is not a general right to erasure; there are exceptions. For example, we have the right to continue using your personal information if such use is necessary for compliance with our legal obligations or for the establishment, exercise or defence of legal claims. You can delete your account at any time by emailing us hello@roostr.app.

Right to restrict processing

You have the right to restrict further use of your personal information where you believe that the information we hold about you is inaccurate, our use of such information is unlawful or if we no longer need to use the information for the purposes for which we hold it. When processing is restricted, we can still store your personal information, but may not use it further.

Right to object to processing

You have the right to object to us processing your personal information for our legitimate business purposes or for direct marketing purposes

Right to withdraw consent to processing

If you have given your consent to us to process your personal information for a particular purpose (for example, in respect of marketing communications) you have the right to withdraw your consent at any time (although if you do so, it does not mean that any processing of your personal information up to that point is unlawful).

Right to make a complaint to the UK data protection authority

You have the right to make a complaint to the Information Commissioner's Office (ICO) if you are unhappy with how we have handled your personal information or believe our processing of your personal information does not comply with applicable data protection law.

Please note that if you ask us to stop using your personal information in a certain way or erase your personal information, and this type of use or personal information is required by us in order to facilitate your use of the Service in any way, you may not be able to use the Service as you did before. This does not include your right to opt out of receiving marketing communications from us, which you can do so at any time without restriction.

How Can I opt out / unsubscribe from marketing emails?

If for any reason you would like to stop receiving emails sent by Roostr that notify you of marketing content, simply click the unsubscribe link provided at the bottom of the email, or reply to the email with 'unsubscribe' in the subject line.

How can I update my personal information?

To manage and update your Account information, "User Profile" or any supporting documents you can contact us during office hours Monday to Friday 08:30 – 17:00hrs by phone 01202 798745 or email hello@roostr.app.

How Can I contact Roostr if I have questions or complaints about this privacy policy?

If you have any questions or concerns regarding this Privacy Policy please contact Roostr by email hello@roostr.app.

If you are not satisfied with our response to any enquiry or complaint or believe our use of your personal information does not comply with applicable data protection law, you can make a complaint to the Information Commissioner's Office (ICO)

You will not have to pay a fee to access your personal information (or to exercise any of your other rights). However, we may charge a reasonable fee if your request is clearly unfounded,

repetitive or excessive; or we may refuse to comply with your request in these circumstances.

Changes to this privacy policy and your duty to inform us of changes

We recommend that you review this Privacy Policy periodically, as we will update it from time to time. Any changes to this Privacy Policy will be posted on our Website.

It is important that the personal information we hold about you is accurate and up to date. Please let us know if your personal information changes during your use of the Service.

Cookie Policy

This Cookie Policy explains what cookies are, which cookies we use and why, and what you can do to manage your cookie preferences. Where any information we collect through cookies qualifies as personal information, our Privacy Policy applies to the collection and use of that information.

Please review this Cookie Policy and our Privacy Policy carefully. This Cookie Policy may be updated from time to time. We will post the updated terms on the Website.

What are Cookies?

Cookies are small text files that are transferred and stored by your web browser to your computer or mobile device when you visit or use a website. Cookies contain information that is unique to your web browser, which means they can be used to distinguish you from other website users.

Cookies can also be considered as 'persistent' or 'session' cookies depending on their duration. Persistent cookies remain on a user's device for the period of time specified in those cookies, and are activated each time that user visits the website that created the cookies, until the cookies expire or are disabled by the user. Session cookies allow the actions of a user to be linked during a single browsing session. A session starts when a user opens a browser window and ends when the browser window is closed, following which all session cookies are deleted.

Pixel tags and Web beacons are tiny graphic images that allow us or preferred service providers to track analytic information about your visit to our Website (such as pages viewed or links clicked) and monitor when HTML emails are opened.

Why does Roostr use Cookies?

We use cookies to collect information about your browsing activity and how you use our services as well as about the device you have used to access our Website (including in some instances the IP

address, browser type and mobile device identifiers) so that we can: provide essential features and functionality on our Website, make our Website as easy and intuitive as possible for you to use; monitor and analyse Website usage and recognise you when you return to our Website

We also permit a number of third party cookies on our website to assist and enable our marketing programmes.

How can I manage my Cookie preferences?

The analytical/performance, functionality and targeting/advertising cookies on our Website are not strictly necessary for our Website to function but improve the overall performance of our Website and provide you with a better user experience. You can delete or block these cookies by changing the setting on your web browser that allows you to delete or block the setting of some or all cookies. Most browsers are initially set to accept cookies, however, please note that if you do delete or block cookies, we cannot ensure that all pages on our Website will be displayed and/or that all the features and functions of our Website will be fully available.