

**Policy & Procedure –  
Privacy and Confidentiality of Information  
Statement**



**Freedom Healthcare Staffing**

**Privacy and Confidentiality Statement (IM.3)**

Freedom Healthcare Staffing (FHCS) respects the privacy and confidentiality of our customers, applicants, and employees and we acknowledge your rights related to the personal information we collect from you. FHCS supports all national and local privacy laws, and has implemented mechanisms to meet the requirements of those laws.

The following explains our privacy and confidentiality principles and practices for gathering, storing, and using personal data. We encourage you to review this information so that you may understand and consent to these practices. Should you be unwilling to provide sufficient information, we may be unable to assist you with your staffing or employment requirements.

FHCS informs our customers, applicants, and employees about the information we collect, how we use it, and whether it will be transferred to third parties. Where possible, we provide an individual with details prior to their providing this information, or as soon thereafter as is practical. FHCS's goals in collecting data are to meet the specific needs of our employees and hospital clients, and to provide each with the greatest degree of personalized and customized services possible. By doing so, FHCS is able to deliver leading staffing and employment services on a consistent and high-quality basis.

In general, personal and/or confidential information is requested when you contact us to look for employment or to search for a candidate to fill a job vacancy. We ask all applicants for personal information such as home address and telephone number, identifying information such as social security number and license number, work experience, education, and skills. When hiring employees, we may also request personal information that is considered "sensitive," such as information necessary to provide health benefits. FHCS recommends that you do not disclose any personal characteristics with respect to laws and regulations associated with Equal Opportunity Employment when initially applying for employment through FHCS.

The amount of personal information you are required to supply will normally be limited to only that which is necessary to supply our services to you.

## **Applicants and Employees**

FHCS provides electronic means on its website, [www.freedomhcs.com](http://www.freedomhcs.com), to provide personal information. When you apply using our electronic application, sign up for our job-search services or electronic timecard submittal, we may ask you for your name, e-mail address, or other personal information such as work experience, education, and skills. *None* of the information collected via electronic means remains on our website or web server subsequent to the submittal of this data.

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## **Electronic Timekeeping**

In order to process payroll for our employees and facilitate billing of our customers, FHCS may collect personal data online or via facsimile transmittal from our employees such as name, hours, address, and any other personal identification information, including a social security number or tax identification number. This data will be used to process payroll either through FHCS operations or an agent of FHCS. When collecting timekeeping data electronically or manually, FHCS will ensure that its collection and processing meets all privacy requirements.

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## **Links**

Our website home page contains links to other FHCS pages that adhere to the same privacy principles. For links to non-FHCS organizations, FHCS is not responsible for the privacy practices or the content of such websites.

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## **Retention of Personal Data**

Personal data that is collected from you will be retained or destroyed according to company requirements and federal and local laws.

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## **Whom We Share It with**

FHCS holds its employees and agents accountable for maintaining the trust of our applicants, employees, and customers. We educate our employees and periodically verify our compliance with our privacy confidentiality and security policies. FHCS does not give, sell or trade personal data to third parties. We will only disclose personal information in other circumstances when required by law, or by certifying bodies (such as the Joint Commission) which require access to enable certification activities.

In order to provide our services, personal data you give us may be shared with

other FHCS operations that are governed by the same privacy principles and security practices.

We will send the personal data of our applicants and employees to FHCS customers and/or agents upon your consent, who are acting on our behalf to provide you an employment opportunity.

For our employees, we occasionally use other companies to provide limited services on our behalf, such as payroll processing services and health-care benefits.

We may also send your personal data to contractors who will then contact you to determine your feedback and satisfaction with our services. We will only provide these agents and suppliers with the personal information they need to deliver the service we have requested.

FHCS may also collect and report demographic data to customers, potential customers, certifying bodies, or as required by law. Any provision of demographic information to third parties will always be pursuant to the removal of unique personally identifiable information. This information is used and analyzed only at an aggregate level to help us understand trends and improve our services.

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## **Consent**

FHCS offers its customers, applicants, and employees options for receiving further communications, and transferring data to third parties. The amount of personal information you are required to supply will normally be limited to that which is necessary to supply the services you requested.

Execution of the signature on our application confers consent for the sharing of personal information and notice of job opportunities. Each email notification includes instruction for opting out of receiving future e-mails. Our database is updated when you opt out. When collecting sensitive information, we will ask you to provide your consent to collect, store, and in some cases, transfer this data to third parties including payroll service companies, health insurance organizations, or government agencies as required by law. FHCS takes all reasonable security measures to protect the confidentiality and integrity of sensitive data collected, stored, and used.

FHCS also collects the type of data which is viewed as sensitive, such as that required to provide/enroll in health-care insurances, or to verify health qualification for placement in healthcare facilities. This data is either governed by employment laws (such as ERISA), confidentiality laws (such as HIPAA) or is in the interests of the individual employee.

In order to comply with statutes, rules, regulations or customer requirements pertaining to equal employment opportunities, we may also ask employees to provide gender or racial information. This provision of this type of information will be voluntary, unless it is required by law, and will not hinder your employment opportunities.

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## **Security**

FHCS takes care to secure personal information given to us by our customers, applicants, and employees. We protect this personal information through various security practices and measures in order to prevent loss, misuse, alteration, unauthorized access, destruction, or disclosure.

FHCS protects the security of the personal information you provide. This information may be stored in manual or electronic systems with limited access in order to protect this information from loss, misuse, unauthorized access, disclosure, alteration, or destruction.

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## **For More Information**

FHCS can respond to your privacy and confidentiality questions or issues. Ownership of our data privacy and confidentiality practices is assigned at the executive level of FHCS, as is dispute resolution for our customers, applicants, and employees. We will fully cooperate with the Federal Trade Commission or local data protection authorities when requested to do so. Our standards represent our commitment to ensuring that your personal information is safe and secure.

This policy is subject of change at the discretion of Senior Management as may be prudent for the continued successful operation of Freedom Healthcare Staffing.

Effective/Revised: 8/15/2008

CEO Approval: \_\_\_\_\_