



IT Services – Devon GP Surgeries

Privacy Notice

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Introduction

This privacy policy describes how Delt Shared Services Ltd protects and makes use of the information held about you for our IT Services.

If you are asked to provide information relating to this service, it will only be used in the ways described in this privacy policy.

This Privacy Policy may be updated from time to time. All updates and amendments are effective immediately and we encourage you to review this Privacy Policy often to stay informed of changes.

If you have any questions about this policy, please email info@deltservices.co.uk

Who we are

Delt Shared Services Ltd
2 Derriford Business Park
Derriford
Plymouth
PL6 5QZ

You can contact us with queries on:

Telephone: +44(0)1752 308888

Email: info@deltservices.co.uk

Applicability of this policy

This privacy policy applies to the service supplied by Delt Shared Services Ltd only.

What personal data we collect and how we use it

At Delt Shared Services Ltd. we are committed to safeguarding and preserving the privacy of those we hold data about. We use personal data for the following purposes:

Provision of access to IT services and support of these services

In order to provide you with access to your organisation's IT systems we receive and process the following data about you:

- Your name
- Your job title, department, and manager
- Your main office location
- A user ID that refers to you

When we create your account, we also create your work email address and telephone number(s).

We use this data only for the purpose of managing your account and supporting your use of the IT systems provided by Delt. Our processing of your data is carried out as part of our contract to provide IT services with your organisation, who supply us with your data in order to create your account.

We hold this information for our records, and will do so for the duration of the contract between Delt and NEW Devon CCG to provide IT Services to GP Surgeries. At the point that this contract is ceased, the data will be removed.

We also need to use the data listed above to create your account within HPE Service Anywhere, a third-party service. HPE Service Anywhere is our toolset for recording incidents and service requests relating to the IT Services. Here, your information is used so that you can be contacted by the service desk, to retain a historical log of the IT service issues you have reported to us, and may be used to contact you for customer satisfaction surveys so that Delt may improve the services offered to your organisation.

During the process of offering IT support, we may need to collect additional data, such as alternative contact numbers. You are not required to provide such data. Such requests will only be made where it should provide value to you. Such data may be recorded in an incident record but will not be used for purposes other than it was requested at the time. In any case where you believe this data has been recorded, and you do not wish for it to be held, you may request that we remove it.

IT system monitoring

To protect systems and the data held within them, Delt must monitor these systems and how they are accessed. Monitoring data will also be used for service management purposes, for functions such as capacity management. Our monitoring captures:

- User IDs
- Email addresses
- Actions taken by user IDs
- Periods of computer use for managed computers
- Location of login for managed computers
- IP address of the connecting computers
- Web browsing logs from managed computers
- Data usage volumes for managed computers
- Raw network capture data crossing network boundaries

We need this level of detail to be able to attribute specific events to specific computer accounts or people.

The data is retained based on individual system retention limits and lifetime of the system. Individual system event logs, such as on servers, may have a shorter period of retention. This data is used in the identification of malicious or otherwise harmful events.

Our IT provisioning tool, AutoTask is a cloud hosted service that also captures and uses some of this data. This tool has a role in provisioning of access and captures this data for identification and monitoring purposes. We have verified that AutoTask will support the requirements of the GDPR for data that exists in their systems.

Some monitoring information is captured by our protective monitoring provider, Babcock MSS (a third-party organisation). Babcock MSS are contracted by Delt to provide expert services in security threat identification and analysis. System and server log information that is sent to Babcock MSS is stored within the UK.

The majority of monitoring information is stored onsite with Delt, except where captured by cloud services such as Office 365. All cloud services are assessed to check that personal data is stored either inside the EEA, or that appropriate alternative controls are employed to protect the data.

Your rights relating to personal data

Access to information

In accordance with the General Data Protection Regulation (2016) you have the right to access any information that we hold relating to you and Delt Shared Services Ltd shall charge no fee for the processing of this request. You can make a request by emailing subjectaccessrequest@deltservices.co.uk. You can help us return the data you're looking for by completing and attaching our [Data Subject Access Request Form](#).

For data we hold or process on behalf of NEW Devon CCG as part of the contract between Delt and NEW Devon CCG to provide IT Services to GP Surgeries, you will need to make the request to NEW Devon CCG directly.

Correcting your data

At any time, you may contact us to request your data be corrected if you believe it to be incorrect. To do so, contact us at info@deltservices.co.uk and include who you are, and what type of data you believe needs to be corrected. To protect your data, as part of this activity we may need to ask you for identifying documents to confirm who you are.

For data we hold or process on behalf of NEW Devon CCG as part of the contract between Delt and NEW Devon CCG to provide IT Services to GP Surgeries, you will need to make the request to NEW Devon CCG directly.

Erasure of the data we hold

Also known as “The Right to Be Forgotten”. You have a right to have your data erased if:

- the personal data is no longer necessary for the purpose which we originally collected or processed it for;
- we are relying on consent as our lawful basis for holding the data, and you withdraw your consent – we will specifically mention if we rely on consent;
- we are relying on legitimate interests as your basis for processing, the individual objects to the processing of their data, and there is no overriding legitimate interest to continue this processing – we will specifically mention if we rely on legitimate interests as our basis for processing;
- we are processing the personal data for direct marketing purposes and you object to that processing – we will specifically mention if we will use your data for direct marketing;
- we are determined to have processed the personal data unlawfully;
- we have to do it to comply with a legal obligation; or
- we have processed the personal data to offer information society services to a child.

To request erasure of your data, please email info@deltaservices.co.uk, and include the types of data about you that we need to erase, and the reason from the above list that you believe relates to the requirement for us to erase your data. To protect your data, as part of this activity we may need to ask you for identifying documents to confirm who you are.

For data we hold or process on behalf of NEW Devon CCG as part of the contract between Delt and NEW Devon CCG to provide IT Services to GP Surgeries, you will need to make the request to NEW Devon CCG directly.

Restriction of processing

You have the right to request that we restrict processing your data if:

- you contest the accuracy of your personal data and we are verifying the accuracy of the data;
- the data has been unlawfully processed (i.e. in breach of the lawfulness requirement of the first principle of the GDPR) and the individual opposes erasure and requests restriction instead;
- we no longer need the personal data, but you need us to keep it in order to establish, exercise or defend a legal claim; or
- you have objected to us processing your data under EU GDPR 2016 Article 21(1), and we are considering whether our legitimate grounds override yours.

To place such a request please email info@deltaservices.co.uk, and include the types of data about you for which we need to restrict processing. To protect your data, as part of this activity we may need to ask you for identifying documents to confirm who you are.

For data we hold or process on behalf of NEW Devon CCG as part of the contract between Delt and NEW Devon CCG to provide IT Services to GP Surgeries, you will need to make the request to NEW Devon CCG directly.

Data portability

In certain circumstances, you have a right to receive data from us in a “portable” format. This means the data must be provided in a structured and commonly used, machine readable format. This right applies where all 3 of the follow are met:

- you (as an individual) have provided data to us;
- our lawful basis for processing this information is consent **or** for the performance of a contract – if either of these are used they will be mentioned specifically in this privacy notice; and
- we are carrying out the processing by automated means (i.e. excluding paper files).

If you believe these criteria are met, please email your request to info@deltaservices.co.uk, and include the types of data about you that you would like a copy of. To protect your data, as part of this activity we may need to ask you for identifying documents to confirm who you are.

For data we hold or process on behalf of NEW Devon CCG as part of the contract between Delt and NEW Devon CCG to provide IT Services to GP Surgeries, you will need to make the request to NEW Devon CCG directly.

Objecting to processing

You have the right to object to:

- processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
- direct marketing (including profiling); and
- processing for purposes of scientific/historical research and statistics.

For an objection against the first point, you must provide a reason relating to your own situation that warrants an objection to the processing. In the case of legitimate reason, we must stop processing the personal data unless:

- we can demonstrate compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the person objecting; or
- the processing is for the establishment, exercise or defence of legal claims.

For an objection against processing for direct marketing, we must stop processing your data.

For an objection against processing for scientific/historical research and statistics, you must provide a reason relating to your own situation that warrants an objection to the processing. In the case of legitimate reason, we must stop processing the personal data unless the processing is necessary for the performance of a public interest task.

The object to processing, please email your request to info@deltaservices.co.uk, and include your objection, reason for objecting, and the types of data about you that you object to the processing of. To protect your data, as part of this activity we may need to ask you for identifying documents to confirm who you are.

For data we hold or process on behalf of NEW Devon CCG as part of the contract between our organisations, you will need to make the request to them directly.

Automated decision making

This notice identifies any instances of automated decision making that is related to the processing described.

How we respond to requests to exercise your rights to your personal data

We are required by law to comply with your requests. In certain circumstances, however, we have the right to reject such a request.

We may refuse to comply with a request for erasure if it is manifestly unfounded or excessive, taking into account whether the request is repetitive in nature.

- In such a case that we consider a request is manifestly unfounded or excessive we can:
- request a "reasonable fee" to deal with the request; or
- refuse to deal with the request.

In either case we must justify your decision, and will inform you of our reasons for doing so.

Any such fees will be based on the administrative costs of complying with your request. If we decide to charge a fee, we shall contact you promptly and inform you of such. We do not need to comply with the request until we have received the fee.

Lodging a complaint about handling of your data

If you believe you have an issue with how your data is being processed, we would encourage you to contact us first, putting your complaint in writing to info@deltservices.co.uk.

Under the EU General Data Protection Regulation 2016 you have the right to lodge a complaint with the "supervisory authority" applicable to you. If you are a UK resident, your supervisory authority is the Information Commissioner's Office (or ICO). You can find more details about how to do this on the ICO's website, here: <https://ico.org.uk/concerns/>