

Being transparent and providing accessible information to individuals about how we use personal information is a key element of the Data Protection Act 2018 and the General Data Protection Regulation (Regulation (EU) 2016/679).

## **The information being processed**

Plymouth City Council is collecting personal mobile phone numbers for the purpose of Multi-factor authentication in CoreHR, which is an online system for managing all aspects of HR for the Council.

This information will be used for facilitating the receipt of a text message which will authenticate a staff member and provide access to CoreHR in order to conduct transactions.

The information being collected is being processed under the Data Protection Act legal basis of Consent.

If you do not consent to sharing your information for this purpose, alternative means of authentication will be provided.

If you wish to withdraw consent at any time, each organisation listed below will be contacted to delete the information. Deletion will be confirmed in writing.

### **Information Sharing**

To ensure that the council provides you with an efficient and effective service we will sometimes need to share your information between teams within the council as well as with our partner organisations that support the delivery of the service you may receive. In this case, the information collected will be shared with:

- Delt Shared Services
- CoreHR
  - A subsidiary of the Access Group, headquartered in Colchester, Essex, UK.
- Vonage Nexmo
  - A publicly held business cloud communications provider. Headquartered in Holmdel Township, New Jersey, USA.

We will only ever share your information if we are satisfied that our partners or suppliers have sufficient measures in place to protect your information in the same way that we do.

The data transfer mechanism is as follows:

- Council to Delt: Secure email
- Delt to CoreHR: The information will be loaded directly into the CoreHR database using a secure connection.
- CoreHR to Vonage Nexmo: is achieved by a secure API accessible only with an API secret code and API Key which are unique to the Delt Nexmo account.

If you would like further details please contact [DataProtectionOfficer@plymouth.gov.uk](mailto:DataProtectionOfficer@plymouth.gov.uk) for a copy of the Data Protection Impact Assessment.

We will never share your information for marketing purposes.

## **Retention Periods**

- Delt shared Services will only keep your information for 7 years after you have left Council employment.
- CoreHR will only keep your information for 7 years after you have left Council employment.
- Vonage Nexmo will only keep your information for 13 months.

### **Details of transfers to third country and safeguards**

Your personal and data will only be stored and processed on servers located in the following locations:

- Delt shared services will store data within the United Kingdom.
- CoreHR will store data within the Republic of Ireland.
- Vonage Nexmo will store data within the UK, Netherlands, US and Singapore.

### **Purpose of Processing Personal information**

As a local authority, the council delivers services to you. In order to do this in an effective way we will need to collect and use personal information about you.

The Data Protection Act 2018 and the EU General Data Protection Regulation ensure that we comply with a series of data protection principles. These principles are there to protect you and they make sure that we:

- Process all personal information lawfully, fairly and in a transparent manner.
- Collect personal information for a specified, explicit and legitimate purpose.
- Ensure that the personal information processed is adequate, relevant and limited to the purposes for which it was collected.
- Ensure the personal information is accurate and up to date.
- Keep your personal information for no longer than is necessary for the purpose(s) for which it was collected.
- Keep your personal information securely using appropriate technical or organisational measures.

### **Your Rights**

You have certain rights under the Data Protection Act 2018 and the EU General Data Protection Regulations (GDPR), these are:

- The right to be informed via Privacy Notices such as this.
- The right of access to any personal information the council holds about yourself.
- The right of rectification, we must correct inaccurate or incomplete data within one month.
- The right to erasure. You have the right to have your personal data erased and to prevent processing unless we have a legal obligation to process your personal information.

### **Data Controller**

Plymouth City Council is registered as a data controller with the Information Commissioner's Office (registration number: Z7262171).

Contact details for the council's data controller are:

Data Protection Officer, Plymouth City Council, Ballard House, West Hoe Road,  
Plymouth PL1 3BJ.

Email: [dataprotectionofficer@plymouth.gov.uk](mailto:dataprotectionofficer@plymouth.gov.uk)