

# Transparency Notice

## Information Technology Services



### How we use your personal data

This document sets out how we use personal data in line with the UK General Data Protection Regulation (UK GDPR). It includes a description of our processing activities, and your rights if information about you is included.

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

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

If you have any questions about this policy, please email [info@deltaservices.co.uk](mailto:info@deltaservices.co.uk)

### Who we are

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

Website: <https://deltaservices.com/>

You can contact us with queries on:

Telephone: +44(0)1752 308888

Email: [info@deltaservices.co.uk](mailto:info@deltaservices.co.uk)

### Purposes and Lawful basis

Delt Shared Services Ltd. will use personal data for its legitimate business interests in managing provision of IT support services and specifically to meet contractual obligations it has with your employer to deliver these services.

Delt Shared Services Ltd. will use the minimum necessary personal data to manage the services provided.

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### **Provisioning and supporting your access to your organisation's IT systems and IT resources**

On behalf of your employer, Delt Shared Services Ltd. (Delt) will use basic business-related identifiers such as name, job title, department, manager, main office location and user ID that relates to you to create your IT profile and assign authorised access to it. This information will be provided by your employer.

We will use collect and use similar updated information provided by you or your employer to support ongoing usage of authorised IT services such as recording, investigating and managing any faults or issues you report, and recording and managing requests (for example, changing access to business software applications or new devices). It may also be used to contact you for customer satisfaction surveys to help Delt improve the services offered to your organisation. During the process of offering IT support, we may collect additional data, such as alternative contact numbers to improve customer service, or home address if we need to deliver something to you at home (for example if you are working from home and need a device to be delivered to you rather than at your employer's office address or a Delt office).

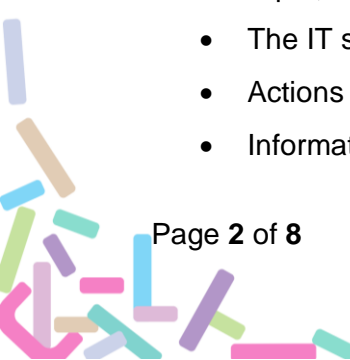
Devices or services provided to you may have different options for Multifactor Authentication (MFA) available to help you protect your and your customer's data. For example, you may use a thumbprint or the inbuilt camera to unlock a mobile device or use your personal mobile number (or an authentication app on your mobile phone) to authenticate your use of a business application. In the majority of cases Delt will not have access to this data and, even where we do, will not use it for any other purpose. For further explanation of how an individual service operates you may wish to review the appropriate supplier's privacy/transparency information.

If you contact our Service Desk by phone, your call will be recorded for review and training purposes.

Where Delt manages technology assets and resources on your employer or service providers behalf, Delt may share information with them about your use of these assets and resources.

For example, in relation to:

- The IT services and resources you use or have assigned to you
- Actions you have taken
- Information about faults, or issues reported



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For further explanation of what information your employer uses about you please refer to your employers or service provider's privacy information.

Your employer or service provider may also need Delt to extract their organisational data from the IT services they use to store and process the data which Delt supports.

### **IT service monitoring**

To maintain the integrity of the IT services being provided, Delt must monitor technology assets and services. This includes things like how they are accessed and whether a device has all the required security updates. Monitoring data will also be used to investigate faults, incidents and issues, and for service management purposes (for example to make sure there is enough capacity for the service to continue to be delivered).

Our monitoring captures information such as:

- User IDs
- Email addresses
- Activity by user IDs
- Dates, times, and location of equipment use
- IP addresses accessing Delt managed systems
- Web browsing logs

We need this level of detail to be able to deliver contracted services.

The data is retained for a set time depending on the system. In some cases this is extended to the lifetime of the system. Individual computer logs, such as on servers, may have a shorter period of retention. This data is used to prevent malicious or fraudulent activity. It may also be shared with your employer to ensure company policy or contracts are adhered to.

The service provided to your employer by Delt may include a 24 hour monitoring service provided by a third party. Information shared with the provider is limited to logs generated by the IT services. They do not have access to the IT systems themselves. The purpose of this service is to identify malicious and fraudulent activity and threats within the IT services that are in scope, protecting the data of the customer organisation and the people about whom it processes information.

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In the event of an incident or investigation, details may be shared with your employer or service provider (depending on your relationship with Delt's customer organisation) which may include this information.

### **IT Training**

On behalf of your employer, Delt will use basic business-related identifiers such as name, job title, department, manager, main office location, business contact information to deliver training and manage the service.

### **Business Continuity**

If you are assigned by your employer as a contact point in the event of critical IT service failure (typically senior managers/managers of critical public services) Delt Shared Services Ltd may collect and hold basic identifiers such as name, job title, location and preferred contact information in order to contact you if business continuity plans are activated.

If you are involved in a critical incident response, your name, job role etc. may also be included in records related to the incident such as records of discussions, incident reports or lessons learnt.

It is possible, but not likely, that Delt will be asked or obliged to provide data for another reason. If that request or demand is valid Delt will tell you about it, unless we are legally required not to.

If you visit Delt Shared Services Ltd offices in person as part of the services we provide to you on behalf of your employer, you may also wish to review the transparency notice relating to office visitors. This page also hosts privacy information relating to other services offered by Delt (<https://deltservices.com/privacy-policy/>).

## Processors and International Transfers

We use third party data processors to provide elements of services on our behalf. This includes (for example) cloud hosted data storage, suppliers of IT systems and service providers. The contracts we have in place with these data processors means they must not do anything with your personal information unless we have instructed them to do so. This includes sharing your

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personal information with any organisation apart from us. They will hold and retain it securely only for the period we instruct.

Wherever possible data above identifying you used to deliver IT services you will be processed by us in the UK. Exceptions include where the data processor hosts the data and may have data centres or provide support services from multiple countries including the UK, EU etc. When a new processor of personal data is selected, where the supplier provides the option, data processing will be limited to UK, EEA (European Economic Area) and EFTA (European Free Trade Association) or other third countries where there is a UK 'adequacy regulation' set out in law (providing comparable data protections), in that order of preference.

Where the data that relates to you is a result your use of software applications or services provided by your employer or service provider, location of your data will depend on that product's hosting arrangements. Delt manages the contracts of 100's of software applications for our customers, but also may not manage or be aware of all services your employer or service provider uses that may hold information that relates to you in them. As your employer/service provider is the Data Controller in this instance we would always recommend referring to the privacy information they publish for a complete picture of how information about you may be processed.

## Retention

### **Managing and supporting your access to your organisation's IT systems and IT resources**

Basic business identifiers that relate IT requests and fault reporting information made by or on behalf of you to enable you to perform your job role are likely to be held for the lifetime of the IT Service Management IT system used to manage them.

Phone calls made to our customer service line will be retained for 12 months.

If you choose to use biometric information, for example thumbprint or the inbuilt camera to unlock a mobile device, on return to Delt any data that is part of your profile will be removed and, if the device is not suitable for reissue, the device itself will also be securely disposed of.

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### Monitoring data

Monitoring data is retained for a set time depending on the system. In some cases this is extended to the lifetime of the system. Individual computer logs, such as on servers, may have a shorter period of retention.

### IT Training

IT training records delivered as part of annual projects will be held for 2 years.

### Business Continuity

Identifiers and contact information of Delt customers used for Business Continuity will be maintained as current and updated when Delt are informed of changes.

Unstructured information such as that held in email may be retained indefinitely.

For an explanation of information that identifies you that may be processed in any of the software applications or services you use that Delt administers on your employer's or service provider's behalf, you may wish to review your employer's or service provider's privacy information.

## Your data protection rights

**Please note: Where Delt Shared Services Ltd. processes information that relates to you as a result of services it is contracted to provide on behalf of your employer or service provider, your employer or service provider makes decisions about what is collected and how it is processed (they remain the Data Controller). Where this is the case, to exercise these rights you will need to contact your employer or service provider.**

UK GDPR gives you rights over personal data **that relates to you**, these include:

- The right to ask us for copies of your personal information.
- The right to ask us to rectify personal information if you can show it is incorrect and ask us to complete information you can show is incomplete.

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- The right to ask us to erase your personal information where Delt Shared Services Ltd no longer has a legitimate purpose to process it.
- The right, in certain circumstances, to ask us to restrict the processing of your personal information.
- The right, in some circumstances, to object to the processing of your personal information.
- The right to stop us processing your personal information where Delt Shared Services Ltd. does not have a legal or contractual obligation to process your personal information.
- The right to prevent any wholly automated decisions involving personal data; Delt Shared Services does not use any wholly automated decision-making techniques about individuals for these purposes.

To exercise any of these rights, please contact us at [DataProtectionOfficer@deltservices.co.uk](mailto:DataProtectionOfficer@deltservices.co.uk). You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

You may need to prove your identity before getting access to data that relates to you or exercising your other rights. This may be by providing a proof of ID (we will not keep a copy once it has been verified) or by providing contextual information that proves that you are who you say you are.

If your request relates to access to personal data that relates to you:

- We invite you to use [Delt's Subject Access Request Form](#). This will help you to provide the information we need to process your request as quickly as possible, including verification of identity.
- We may write back to ask for clarification or to request that you to narrow or modify your requirements if they are unclear. This will pause the one month timescale for the complete response.
- If your request is complex or we have received multiple requests from you we may extend the time for a further two months. We will tell you if this applies within the initial month and as soon as we identify it.

You can find out more about what data protection law means for you by visiting <https://ico.org.uk/your-data-matters/>

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### How to complain

If you have any concerns or questions about our use of your personal information, please contact us at [DataProtectionOfficer@deltservices.co.uk](mailto:DataProtectionOfficer@deltservices.co.uk).

You can also complain to the ICO if you are unhappy with how we have used personal data that relates to you.

The ICO's address:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>