

Printing Service

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 DataProtectionOfficer@deltservices.co.uk.

Who we are

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

Website: https://deltservices.com/
You can contact us with queries on: Telephone: +44(0)1752 308888
Email: info@deltservices.co.uk

Purposes and Lawful basis

Data Protection Legislation such as UK GDPR makes a distinction between "controllers" and "processors" of information about people. A controller decides why and how to process the personal information. A processor only processes information on behalf of a controller, based on the controller's instructions, and does not make any decisions about personal information and how it will be used. Delt Shared Services Ltd. may be either a controller or a processor, depending on the scenario.

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SHARED SERVICES

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Where Delt Shared Services Ltd is the controller

Delt Shared Services Ltd. will use personal data for its legitimate business interests providing a print and mail service and processing payments to fulfil financial commitments or contracts as part of managing that service.

Delt Shared Services Ltd. will use the minimum necessary personal data to manage these services, which is likely to be limited to basic identifiers such as name, contact information and role, but could include personal contact information where the service requires delivery to your home address (for example).

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

Where Delt Shared Services Ltd. is a processor

As we provide services to local government and health organisations, personal information which is printed and/or distributed by the service may include a range of sensitive personal information provided by the owner of the information. See transparency information published by them for additional information such as their legal basis processing this information about you. Delt Shared Services Ltd. will only process this information as they instruct: to print, transport or deliver printed items, and will not use or share it for our own purposes.

Processors and International Transfers

The data above which identifies you will be processed in the UK.

We use third party data processors to provide elements of services on our behalf. This includes (for example) courier/distribution providers, our payment processing providers, cloud hosted data storage, suppliers of IT systems, and other service providers. Occasionally it may also include delivering printing services where we do not have all of the required capabilities in house.

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

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Retention

Print run data is held for 4 weeks, unless there is a customer requirement for it to be longer, or an operational need to extend it (for example mail merge data is held for 1 month after printing). Where this is the case data is held for as long as the customer requires or the work is complete and then safely disposed of.

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

Your data protection rights

UK GDPR gives you rights over personal data that relates to you. As you can see from the above, information Delt holds about you for its own purposes is likely to be minimal.

It is likely that, for the majority of information about individuals Delt Shared Services Ltd. processes relating to this service, your employer or service provider makes decisions about what is collected and how it is processed (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.
- 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 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, 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 prevent any wholly automated decisions involving personal data; Delt Shared Services Ltd. does not however use any wholly automated decision-making techniques about individuals.

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Where Delt Shared Services Ltd. is processing information about you for our own purposes to exercise any of these rights please contact us at 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 <u>Delt's Subject Access Request Form</u>. 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/

How to complain

If you have any concerns or questions about our use of your personal information, please raise them with us directly by contacting 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

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Printing Service

Cheshire SK9 5AF

Helpline number: 0303 123 1113

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

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