

Contractors and Suppliers

Where you or your employer is a supplier of products or services to Delt Shared Services Ltd. and/or our customers.

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 to stay informed of changes.

If you have any questions about this notice, please email <u>DataProtectionOfficer@deltservices.co.uk</u>

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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Where Delt Shared Services Ltd is the controller

Delt Shared Services Ltd. will use personal data for its legitimate business interests of managing its financial, supplier and service management and procurement affairs or in selling financial management or procurement services, except where the data needs to be kept for tax purposes, which is a legal obligation.

Delt Shared Services Ltd. will use the minimum necessary personal data to manage the supplier relationship.

This is likely to be limited to basic business related identifiers such as name, contact information and role. If it is required in order to deliver your service to our customer, these basic business related identifiers may be shared with the customer.

As part of managing the capture of accurate information as part of the procurement or supplier management processes Delt Shared Services Ltd may record key meetings. You will be notified if recording is in use.

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.

Sole Traders:

If you are a sole trader the following processes may also contain information that identify you as an individual:

- If your company name identifies you, it will be shared with Delt Shared Services Ltd.
 customers who utilise your service in the context of managing or procuring that service on their behalf. It will also be published on our website as part of our contracts register.
- Company level reference or background checks, conducted as part of due diligence when engaging a new supplier, may identify you.
- Depending on your company's financial arrangements, your corporate payment information used to make payments to you may also identify you.

As noted above, if the arrangements you have in place for the above identify you and sharing of this information is required in order to deliver your service to our customer, they may be shared with the customer.

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If you visit Delt Shared Services Ltd. offices in person as part of the services you provide, you may also wish to review the transparency notice relating to Delt office visitors (https://deltservices.com/privacy-policy/)

Where Delt Shared Services Ltd. is a processor

Where Delt Shared Services Ltd. processes your information on behalf of our customer with whom we have a contract.

It is possible that our customer will require processing other than or in addition to what is listed above. If you are providing services to a Delt Shared Services Ltd. customer you may also wish to review their transparency information to understand their use of your personal data. Delt Shared Services Ltd. will only process information on their behalf as they instruct, 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) our payment processing providers, 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 personal information with any organisation apart from us. They will hold and retain it securely only for the period we instruct.

Retention

Any financial transaction data that contains information that identifies you will be held for 7 years.

Any procurement exercise records that contain information that identifies you will be held for 3 years.

Procurement meeting recordings will be securely disposed of at the end of the contract.

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Current contact information held for the purposes of managing our business relationship with our supplier will be updated as we are informed by you or your organisation of changes.

Any information that identifies you and forms part of ongoing support or reference information of a service that you provided, for example as author of a document or email or as part of incident management, is likely to be held for at least as long as that service is provided.

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

Where data about you is required to meet contractual obligations with our customer, it will be held for as long as they instruct. On termination of their contract with Delt Shared Service Ltd. data belonging our customer will either be returned to the customer organisation or destroyed; however they instruct. A list of Delt Shared Services Ltd customers can be found here: Our Customers - Delt Shared Services (deltservices.com)

Your data protection rights

UK GDPR gives you rights over personal data **that relates to you** (as you can see from the above, this is likely to be minimal) 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 does not use any wholly automated decision-making techniques about individuals.

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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.

Please note that, depending on the nature of your request, if Delt Shared Services Ltd. only processes information about you in our role as a Data Processor providing services to a customer organisation we may need to redirect you to the relevant customer Data Controller or work with them to provide you with a complete response. If this is the case, we let you know as soon as possible.

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 contact us at 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:

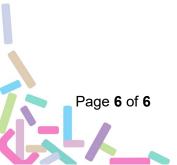
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SHARED SERVICES

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

Helpline number: 0303 123 1113 ICO website: https://www.ico.org.uk



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