

# Transparency notice

## Data Protection 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 [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

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.

### **Where Delt Shared Services Ltd. is the controller**

Delt Shared Services Ltd. will use personal data for its legitimate business interests of managing the Data Protection service including provision of a named DPO (Data Protection Officer) for the customer organisation.

These services may include:

- Providing the customer organisation with data protection advice and guidance
- Reviewing data protection related documentation and communications on behalf of the customer organisation
- Providing training to customer organisation employees
- Providing a contact point for customer organisation data subjects to raise data protection concerns or complaints regarding use of information that relates to them
- Liaising with the Information Commissioners Office on behalf of the customer organisation in the event of a data breach or data protection query where regulator advice is required.

Delt Shared Services Ltd. will use the minimum necessary personal data to manage these services. This is likely to be limited to basic business-related identifiers such as name, contact information and role.

Customer organisation requests will be managed using Delt Shared Services Ltd.’s service management toolset. If your employer also receives other services from us (for example, IT or HR), you may also wish to review the relevant privacy information (<https://deltaservices.com/privacy-policy/>).

### **Where Delt Shared Services Ltd. is a processor**

Where Delt Shared Services Ltd. processes information that relates to you on behalf of our customer with whom we have a contract to provide DPO services such as those listed above.

Due to the nature of our customer base in the public sector, occasionally it may sometimes be necessary for limited sensitive personal information to also be processed by Delt Shared Services Ltd. For example, for our NHS customers, the context of a complaint or data protection advice may include patient health information which also identifies the patient.

On occasion, we may share information about you with third parties such as the ICO or your GP Practice in order to deal with any concerns you may have. We will only do this when we have a lawful basis to do so.

See transparency information published by your employer or service provider for additional information such as their legal basis processing this information about you. 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.

## How we get the personal information

Information about you will be provided to Delt Shared Services Ltd. by your employer or service provider, or direct from you.

## Processors and International Transfers

If Delt Shared Services Ltd. processes information which identifies you for any of the purposes above, it 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.

As your employer/service provider is the Data Controller in this instance we would always recommend referring to the privacy information they publish for you for a complete picture of how information about you is processed.

## Retention

Any basic information that identifies you and forms part of ongoing support of our customer organisation, for example as a customer organisation contact point, the author of a document that is reviewed, or as part of a record of advice given to you as your employer's representative or as or email, may be held for as long as that service is provided.

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

Where Delt Shared Services Ltd. are providing Data Protection to a customer organisation of which you are an employee or service user, information will otherwise be held for as long as they direct. Should their contract with us end data we process on their behalf will either be returned to them or disposed of securely, as they instruct us. A list of Delt Shared Services Ltd customers can be found here: <https://deltaservices.com/who-we-are/our-customers/>.

## Your data protection rights

**Please note: Where Delt Shared Services Ltd. processes information that relates to you as a result of Data Protection services it is contracted to provide to 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** (as you can see from 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 Ltd. does not however use any wholly automated decision-making techniques about individuals.

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@deltaservices.co.uk](mailto:DataProtectionOfficer@deltaservices.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 that Delt holds about you as part of managing the contracted service:

- 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/>.

## How to complain

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