

Transparency notice

Estates Management 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.

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

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 delivery of the contracted Estates / Facilities management service and fulfil financial commitments or contracts as part of managing that service.

These services may include:

- Compliance monitoring for buildings safety
- Building maintenance
- Schools catering
- Cleaning services
- Fleet Management

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.

There may be instances where other information, for example what appropriate qualification or certification you hold to demonstrate you are able to safely carry out particular task onsite, may also be required.

If it is required in order to deliver the contracted service to our customer, this information may be shared with them. 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

Where Delt Shared Services Ltd. processes information that relates to you on behalf of our customer with whom we have a contract.

As well as basic identifiers this may include other information about you, for example:

- If we manage your organisation’s fleet, we may process information like your driving licence number, when you last received minibus training etc.
- If we deliver a catering service, we may process information about relevant food allergies.
- If we support Health and Safety related information and reporting, we may process information about any accidents or near misses that relate to you, or that you witnessed.

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 is likely to be provided to Delt Shared Services Ltd. by your employer or service provider, or directly from you.

Processors and International Transfers

Data about you that is managed by Delt 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 other 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.

Where Delt Shared Services Ltd is the data processor, there may be exceptions to the above if our customer specifies or provides us with access to a specific IT system that we are required to use, which may be managed by them or supplied by the third party why have selected with whom they have a contract. In this case the Data Controller (your employer or service provider) has control over and responsibility for the information store and ensuring data only processed as they intend by any third party (like the supplier of the IT system) and that it is disposed of when no longer required. For example, our Transforming Futures Trust customer requires us to use Oshens to support them in health and safety reporting, and process related data in their own SharePoint data store rather than our own.

Retention

Information that is about you that is managed by Delt Shared Services Ltd. will only be kept for as long as required for the purpose. For example, information about pupil allergies will only be kept by the catering service whilst the pupil is a student.

For information about how long information about you that is managed by your employer or service provider (for example health and safety reporting data) or where your employer or service provider is the Data Controller please refer to the privacy information published by them. On

termination of the contract data belonging to Delt Shared Service Ltd.'s 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: <https://deltaservices.com/who-we-are/our-customers/>.

Your data protection rights

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** (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. 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.

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>