

# Transparency notice

## HR, Organisational Development and Recruitment 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

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 managing contracted HR, recruitment and organisational development services. 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. For more information about this type of processing please see the Delivering Services Transparency Notice published on our website <https://deltaservices.com/privacy-policy>.

Delt Shared Services Ltd. is also the data controller where we process information for the purposes of recruiting our own employees. For more information about this type of processing please see the Delt Recruitment Transparency Notice published on our website <https://deltaservices.com/privacy-policy/>.

If you are a Delt Shared Services Ltd. employee, please see the privacy information published on the company intranet for processing that relates to you.

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

Delt Shared Services Ltd is the processor for providing the HR, recruitment or organisational development services to your employer or potential employer. Delt Shared Services Ltd. will only process this information as the customer organisation instructs, and will not use or share it for our own purposes. 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.

See privacy information published by your employer for comprehensive information such as their legal basis processing this information about you and what it is used for.

## Processors and International Transfers

Where Delt Shared Services Ltd. is the Data Controller, the majority of data above which identifies you will be processed in the UK.

However, if the contract with your employer includes providing them with access to software Delt Shared Services Ltd. us for performance management or to manage pay, expenses, recruitment campaigns etc., data will also be processed in Ireland. To find out more about our Payroll and Pensions please refer to the specific privacy information for this service published on our website <https://deltaservices.com/privacy-policy/>.

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 other 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 they have selected with whom they have a contract. For example, they may require that we use their own information store (e.g. their SharePoint tenant) to store personnel or other HR related records and working documents.

As your employer 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 is processed.

## Retention

Information that about you that relates to managing the service contracted with your employer by Delt Shared Services Ltd. will only be kept for as long as required for the purpose.

Where data about you is required to meet contractual obligations with your employer or service provider, it will be held for as long as they instruct. 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 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](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@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.u>