

# Transparency Notice

## Delt HR and Payroll/Pensions Services

Version 1.5 | Joseph Smith, Stuart Hingston and Jane White



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## Introduction

This privacy policy describes how Delt Shared Services Ltd protects and makes use of the information held about you for the provision of HR and Payroll/Pension Services.

If you are asked to provide information relating to this service, it will only be used in the ways described in this privacy policy.

This Privacy Policy may be updated from time to time. All updates and amendments are effective immediately and we encourage you to review this Privacy Policy often to stay informed of changes.

If you have any questions about this policy, please email [info@deltservices.co.uk](mailto:info@deltservices.co.uk)

## Who we are

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

You can contact us with queries on:

Telephone: +44(0)1752 308888 Email:

[info@deltservices.co.uk](mailto:info@deltservices.co.uk)

## Applicability of this policy

This privacy policy applies to the service supplied by Delt Shared Services Ltd only.

## What personal data we collect and how we use it

At Delt Shared Services Ltd. we are committed to safeguarding and preserving the privacy of those we hold data about. We use personal data for the following purposes:

## **The provision of HR and Payroll/Pensions services and support of these services**

### **Information being processed**

Any data provided to us is for the purpose of providing our services and will be used only for that purpose. It will be retained securely using appropriate technical and organisational measures.

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.

Our basis for the processing of your data is that it is necessary to complete a service contract held with your employer.

Data received will be processed only in accordance with the services contracted between us and your employer. These services are considered necessary for the running your employer's business and for your employer's compliance with statutory regulations and that you are paid and your employment record is maintained under the conditions of your employment. Your employer has contracted for us to maintain such compliance and process the data received by us for that purpose only.

The provision of these services requires personal data to be held about you this includes (but is not limited to):

- Names
- Gender
- Date of birth
- Address
- National Insurance Number
- Nationality
- Employment history
- Salary and Pay information
- Sensitive Data
  - Sexual Orientation
  - Religious Belief
  - Disability status
  - Ethnic Origin
- Occupational Absence Data
  - Sickness
  - Parental
- Marital status
- Bank details
- Tax, National Insurance and Student Loan details

- Compulsory deduction details
- Voluntary deduction details
- Personal and/or work email address
- Telephone number
- Pensions Scheme membership and contributions

## **Retention periods**

Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

Data will only be deleted at the specific request, in writing, by the company that has directly contracted the services.

Your employer may require an extended period of retention to meet either of these criteria:

(a) Personal data held for the purposes of processing payroll for you or your employer will be retained for a minimum of six years plus the current tax year following the date on which it was processed.

(b) Personal data held for the purposes of processing pension's data for you or your employer or pension scheme providers for a period dependent on the requirements of individual pension schemes or for a minimum of six years plus the current tax year following the date on which it was processed.

## **Information Sharing**

To ensure that the services provided to you or your employer are provided in a compliant and an effective manner. Personal data will not be passed to other organisations without your consent, unless this is required by legislation, regulation or for the provision of this service under a contractual arrangement with your employer. This will include:

- Delt to Midland HR Ltd – iTrent (provided by MHR Ltd) is the HR/Payroll System used to provide these services: The information will be loaded directly into the CoreHR database using a secure connection.
- Delt to Corvid Ltd – for the provision of Bacs Payment Business Continuity Services (if your employer contracts for this service from Delt).
- HM Revenue and Customs
- Pension Scheme Providers
- Other third parties where you or your employer has provided written authorisation.

## Information Received

In the provision of these services on occasion personal data will be provided by other bodies that are required to process the services compliantly and accurately. This will include:

- HM Revenue and Customs (including, but not limited to tax codes, student loan deductions)
- Pension Scheme Providers (including, but not limited to pension contribution deduction rates)
- Other third parties where you or your employer has provided written authorisation (including, but not limited to voluntary deductions from pay).

## Details of transfers to third countries and safeguards

Personal data will only be stored and processed within the UK or European Union.

## Your rights relating to personal data

### Access to information

In accordance with the General Data Protection Regulation (2016) you have the right to access any information that we control relating to you and Delt Shared Services Ltd shall charge no fee for the processing of this request. You can make a request by emailing [subjectaccessrequest@deltservices.co.uk](mailto:subjectaccessrequest@deltservices.co.uk). You can help us return the data you're looking for by completing and attaching our [Data Subject Access Request Form](#).

For data passed to us by your employer, you will need to make the request to your employer directly.

### Correcting your data

At any time, you may contact us to request your data be corrected if you believe it to be incorrect. To do so, contact us at [info@deltservices.co.uk](mailto:info@deltservices.co.uk) and include who you are, and what type of data you believe needs to be corrected. To protect your data, as part of this activity we may need to ask you for identifying documents to confirm who you are.

For data passed to us by your employer, you will need to make the request to your employer directly.

## Erasure of the data we hold

Also known as “The Right to Be Forgotten”. You have a right to have your data erased if:

- the personal data is no longer necessary for the purpose which we originally collected or processed it for;
- we are relying on consent as our lawful basis for holding the data, and you withdraw your consent – we will specifically mention if we rely on consent;
- we are relying on legitimate interests as your basis for processing, the individual objects to the processing of their data, and there is no overriding legitimate interest to continue this processing – we will specifically mention if we rely on legitimate interests as our basis for processing;
- we are processing the personal data for direct marketing purposes and you object to that processing – we will specifically mention if we will use your data for direct marketing;
- we are determined to have processed the personal data unlawfully;
- we have to do it to comply with a legal obligation; or
- we have processed the personal data to offer information society services to a child.

To request erasure of your data, please email [info@deltservices.co.uk](mailto:info@deltservices.co.uk), and include the types of data about you that we need to erase, and the reason from the above list that you believe relates to the requirement for us to erase your data. To protect your data, as part of this activity we may need to ask you for identifying documents to confirm who you are.

For data passed to us by your employer, you will need to make the request to your employer directly.

## Restriction of processing

You have the right to request that we restrict processing your data if:

- you contest the accuracy of your personal data and we are verifying the accuracy of the data;
- the data has been unlawfully processed (i.e. in breach of the lawfulness requirement of the first principle of the GDPR) and the individual opposes erasure and requests restriction instead;
- we no longer need the personal data, but you need us to keep it in order to establish, exercise or defend a legal claim; or
- you have objected to us processing your data under Article 21(1), and we are considering whether our legitimate grounds override yours.

To place such a request please email [info@deltservices.co.uk](mailto:info@deltservices.co.uk), and include the types of data about you for which we need to restrict processing. To protect your data, as part of this activity we may need to ask you for identifying documents to confirm who you are.

For data passed to us by your employer, you will need to make the request to your employer directly.

## Data portability

In certain circumstances, you have a right to receive data from us in a “portable” format. This means the data must be provided in a structured and commonly used, machine readable format. This right applies where all 3 of the follow are met:

- you (as an individual) have provided data to us;
- our lawful basis for processing this information is consent **or** for the performance of a contract – if either of these are used they will be mentioned specifically in this privacy notice; and
- we are carrying out the processing by automated means (i.e. excluding paper files).

If you believe these criteria are met, please email your request to [info@deltaservices.co.uk](mailto:info@deltaservices.co.uk), and include the types of data about you that you would like a copy of. To protect your data, as part of this activity we may need to ask you for identifying documents to confirm who you are.

For data passed to us by your employer, you will need to make the request to your employer directly.

## Objecting to processing

You have the right to object to:

- processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
- direct marketing (including profiling); and
- processing for purposes of scientific/historical research and statistics.

For an objection against the first point, you must provide a reason relating to your own situation that warrants an objection to the processing. In the case of legitimate reason, we must stop processing the personal data unless:

- we can demonstrate compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the person objecting; or
- the processing is for the establishment, exercise or defence of legal claims.

For an objection against processing for direct marketing, we must stop processing your data.

For an objection against processing for scientific/historical research and statistics, you must provide a reason relating to your own situation that warrants an objection to the processing. In the case of legitimate reason, we must stop processing the personal data unless the processing is necessary for the performance of a public interest task.

The object to processing, please email your request to [info@deltaservices.co.uk](mailto:info@deltaservices.co.uk), and include your objection, reason for objecting, and the types of data about you that you object to the processing of. To protect your data, as part of this activity we may need to ask you for identifying documents to confirm who you are.

For data passed to us by your employer, you will need to make the request to your employer

directly.

## How we respond to requests to exercise your rights to your personal data

We are required by law to comply with your requests. In certain circumstances, however, we have the right to reject such a request.

We may refuse to comply with a request for erasure if it is manifestly unfounded or excessive, taking into account whether the request is repetitive in nature.

- In such a case that we consider a request is manifestly unfounded or excessive we can:
- request a "reasonable fee" to deal with the request; or
- refuse to deal with the request.

In either case we must justify your decision, and will inform you of our reasons for doing so.

Any such fees will be based on the administrative costs of complying with your request. If we decide to charge a fee, we shall contact you promptly and inform you of such. We do not need to comply with the request until we have received the fee.

## Lodging a complaint about handling of your data

If you believe you have an issue with how your data is being processed, we would encourage you to contact us first, putting your complaint in writing to [info@deltservices.co.uk](mailto:info@deltservices.co.uk). We will take any such complaints seriously and do our best to resolve them.

Under the EU General Data Protection Regulation 2016 you have the right to lodge a complaint with the supervisory authority (the organisation responsible for enforcing data protection in your country) applicable to you. If you are a UK resident, your supervisory authority is the Information Commissioner's Office (or ICO). You can find more details about how to do this on the ICO's website, here: <https://ico.org.uk/concerns/>