

Transparency notice

Managing the organisation and delivering 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.

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

Delt Shared Services Ltd. will use personal data for its legitimate business interests of managing and growing its services, and delivery of contracted services to customer organisations.

Managing the organisation activities include:

- Corporate basis (Board, Shareholders)
- Working with Trade Unions who represent Delt Shared Services Ltd. employees
- Managing enquires and complaints
- Business development
- Public relations and marketing
- Service improvement and customer engagement

Delt Shared Services Ltd. will also use to meet its own legal obligations (for example, health and safety legislation and tax law), including sharing information with the appropriate government body (HMRC, Companies House, Health and Safety Executive etc.)

Service areas include:

- Facilities/Estates management
- Financial (Invoicing, Revenue Accounting, assessing profitability, processing and distributing payments)
- HR, Organisational Development and Recruitment Services
- IT Services (IT management and administration, monitoring and cybersecurity, IT training) and Data Protection Services to GP surgeries.
- Payroll and Pensions administration
- Print Services
- Procurement Services
- Project and Programme Management Services

Delt Shared Services Ltd. will use the minimum necessary personal data to manage these services, which is likely to be limited to basic business related identifiers such as name, contact information and role, but could include personal contact information where the service requires delivery to your home address (for example).

Where processing is expected to exceed these kinds of identifiers, is more complex, or may be

as result of a service provided by Delt Shared Services Ltd direct to you (rather than as result of a contract with your employer or service provider) a separate transparency notice is published on our website for that service or group of services (<https://deltaservices.com/privacy-policy/>).

In these notices we also provide some privacy information about the some of the kinds of information about you we generally expect to process as part of providing the services listed above to your employer or service provider. If this applies to you, please note that this information is not intended to be comprehensive and does not replace privacy information published by your employer or service provider.

Where Delt Shared Services Ltd. processes your information on behalf of your employer or service provider with whom it has a contract, your employer or service provider remains the controller of the information and Delt Shared Services Ltd. will only process your information based on their instructions.

We also publish separate notices for:

- Contractors/suppliers and supplier employees.
- Visitors to Delt Shared Services Ltd offices.

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.

Processors and International Transfers

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.

Any data which identifies you which is processed for these purposes will be processed by Delt Shared Services Ltd. in the UK, unless otherwise stated (see the relevant additional

transparency notices for specific processing or services that apply to you).

Retention

Corporate Basis

Information about directors is held for one year after cessation as director.

Information that is included in shareholder agreements, meetings and decisions will be retained as part of the corporate record.

Financial remuneration information related to directors will be held for 7 years.

Other Information that relates to individual shareholder representatives will be held for 6 months after the period the organisation is a shareholder and they represent it.

Customer organisation contact information will be held for 10 years after end of contract.

Trade union representative contact information will be held until appropriate contact point information is superseded.

Managing Enquiries and Complaints

Complaint management information will be held for 3 years.

Enquiries from members of the public will be kept date of receipt + 6 months.

Business development

Contact information relating to potential customers will be held until such time as it is no longer a viable prospect.

Where information relates to potential employees as part of a transfer of staff into Delt Shared Services Ltd, information relating to individuals will be held until it becomes part of an employee record or the TUPE is no longer a viable prospect.

Public Relations and Marketing

Delt Shared Services Ltd. do not currently carry out any direct marketing.

For information about information processed by our website and social media platforms, please refer to our website's privacy policy (<https://deltaservices.com/privacy-policy/>).

Service Improvement and Customer Engagement

Feedback records that includes names or other identifiers will be kept for not more than 2 years from date received.

Employees or Service Users of a Delt Shared Services Ltd. Customer

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://deltservices.com/who-we-are/our-customers/>

Although we provide some overview privacy information about how we expect to manage these contracted services, particularly where processing is expected to exceed basic identifiers, the specifics will depend on the services your employer or service provider procures from us. As stated above, please refer to your employer or service provider's privacy or transparency information for a complete view of how information about you may be processed and their reasons for doing so.

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

Your data protection rights

UK GDPR gives you rights over personal data that relates to you. As you can see from the above, information Delt holds for about you for its own purposes (to manage our organisation and delivery of services) is likely to be minimal.

Where Delt Shared Services Ltd. processes your information on behalf of your employer or service provider with whom it has a contract to provide a service, to exercise these rights you will need to contact your employer or service provider in the first instance

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@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 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.

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>