

## Delegated Services CIC– Privacy Notice: Customer Data

Last updated: 22/04/24 by RB

The following privacy notice sets out the rights to information that “customers” who are individuals or organisations may have. Customers are individuals or organisations who purchase any service from us including training or an event.

### Our Name and Contact Details

Delegated Services CIC

Clevedon Hall Estate, Elton Road, Clevedon, BS21 7RQ

[info@delegatedservices.org](mailto:info@delegatedservices.org)

[www.delegatedservices.org](http://www.delegatedservices.org) Tel. 01275795827

### Categories of Personal Data That We Process

Delegated Services CIC processes the following personal data in relation to its customers:

- Personal Information (for all or some contacts at each customer base) – Name, photograph, email address, contact phone numbers, social media contacts, position, areas of responsibility, profile, qualifications, memberships, training, feedback forms.
- Organisation Information – School / MAT / Company name, address and postcode, RSC Region, billing contact details, relevant staff and their contact numbers, emergency contact numbers, pupil numbers.
- Financial information: contact name and contact details of personnel who manage or process finance for the organisation, such as email and/or phone number, address, bank account details
- Data Protection Compliance Information; all information around safeguarding and health and safety matters, your customer/pupil/service user information which enables you to identify all people involved in an incident we have any involvement with, policies, risk assessments, RIDDOR/accident, incident and near miss reports, educational/off-site visits. Issues where you are seeking or we are giving you advice, audit reports, risk assessments, policies and all related information, education and offsite visit advice, personal development advice, wellbeing advice, Network Partner referrals, enquiries and our responses, assessments and other client materials.

### The Purposes of Processing Your Data

Your data is processed for the purposes of Delegated Services CIC conducting or improving its core business with regards to the advice and services that we provide to our customers and users. It may also be used to communicate with you about any upcoming initiatives or noteworthy education or community sector news and updates that are relevant to our core business, as well as marketing Delegated Services CIC products or services or collecting information in order to do so.

### The Lawful Bases for Processing Your Data

The lawful bases that apply to the processing of your data in this instance are consent, contract and a legitimate interest(s). This is because you have given us consent to process your data for the purposes set out above by purchasing services or making an enquiry for free advice or information or training event.

### Who We Share Your Data With

We do not share our data with any Third Party Service Providers without your consent. Where it is legally required or necessary (and it complies with data protection law), we may share personal information about you for a specific purpose you have asked us to perform such as with a Network Partner or contractor who you have instructed us to appoint to deliver a specific service that you have purchased through Delegated Services. The information that is

shared is that which is required at that time to deliver that service and is retained by that Network Partner for the period that it is required.

### **Places That Your Data is Stored**

Your data is stored on Delegated Services' google drive. Each member of staff has their own drive and a shared drive and information is shared according to which staff need access to specific types of information. Our mailing system and web, drives and cloud service provider is Google and our finance system is Xero. They do not have any rights to access our data.

When you enter data on to the Customer websites currently the DS Portal and GoTo Daedalus Labyrinth private web site by Delegated Services CIC, this data is accessible only by those employees of Delegated Services CIC and an ITC Consultant who need to access this information to deliver their role.

### **Retention Periods for Your Personal Data**

We retain your personal data for the length of the contract between you and Delegated Services CIC as our customer, then for as long as it is useful for the legitimate interests of our company, it is identified as still accurate, or when you have the right to withdraw your consent to us storing that data or communicating with you.

### **The Rights Available to You in Respect of the Processing of Your Personal Data**

Depending on the lawful basis, you may have the following rights in respect of the processing of your personal data by Delegated Services CIC:

- **Right to be informed** – this gives you the right to be informed about the collection and use of your personal data by Delegated Services CIC. This information is included within this Privacy Statement.
- **Right of access** – you have the right to confirm that Delegated Services CIC is processing your personal data, as well as requesting a copy of the personal data that is held on you as a data subject.
- **Right to rectification** – this gives you the right to have your data rectified if you identify that it is inaccurate. You may do this by email by contacting us directly (see our contact details above). We will ensure that your data is rectified within one calendar month unless we feel that a rectification request is manifestly unfounded or excessive. In this case, we will notify you and justify our decision.
- **Right to erasure** – this gives you the right to have your data erased – ‘the right to be forgotten’ in accordance with the current GDPR legislation where this right only applies in certain circumstances. You may do this directly by email (see our contact details above) or verbally. We will ensure that your data is erased within one calendar month unless we feel that an erasure request is manifestly unfounded or excessive, in which case we would notify you and justify our decision. If this includes organisational data, we would also need a request from at least two of Directors/Trustees/Governors and the most senior member of staff.
- **Right to restrict processing** – this gives you the right to have your personal data restricted or suppressed. This may mean that we retain your personal data but do not use it. You may do this verbally or in writing by contacting us directly (see our contact details above) or through social media. We will ensure that your data is restricted within one calendar month unless we feel that a restriction request is manifestly unfounded or excessive. In this case, we will notify you and justify our decision.
- **Right to data portability** – this gives you the right to obtain and reuse your personal data for your own purposes across different services. If you request your data from us for this purpose, we will provide you only with the information you have provided to us as controller and will make it available in an electronic format.

### **The Right to Withdraw Consent**

You have the right to withdraw your consent for the processing of your personal data by Delegated Services CIC at any time unless doing so prevents us from fulfilling a contract we are currently engaged. You may do this verbally or in writing by contacting us directly (see our contact details above) or through social media. You may also opt out of our marketing emails by emailing us at: [info@delegatedservices.org](mailto:info@delegatedservices.org) and we will respond within one month of notification.

**The Right to Lodge a Complaint with the Supervisory Authority**

If you have concerns about our information rights practices, you have the right to lodge a complaint with the Information Commissioner's Office at [Make a complaint | ICO](#)

**Changes to This Privacy Notice**

We reserve the right to update this privacy notice at any time and we may also notify you from time to time about the processing of your personal information.