



# Privacy Policy



## Introduction

This privacy notice tells you what you can expect us to do with your personal information when you contact us, use one of our services or have an interaction with us as a Data Controller/Processor.

This notice is layered. So, if you wish, you can easily select the reason we process your personal information and see what we do with it.

We will tell you:

- why we can process your information;
- for what purpose we are processing it;
- whether you must provide it to us;
- for how long we keep it;
- whether there are other recipients of your personal information;
- whether we intend to transfer it to another country; and

The first part of the notice is information we need to tell everybody.

### Controller's contact details

Shared Services Connected Limited  
Three Cherry Trees Lane,  
Hemel Hempstead,  
HP2 7AH

Tel: 0203 028 3547

ICO Registration Number ZA022806

Company Registration Number 08460507

For general contact please use our "[contact us form](#)"

### Data Protection Officer's contact details

Our Data Protection Officer is Ruth Walkden.

You can contact her at [dpo.uk@soprasteria.com](mailto:dpo.uk@soprasteria.com)

or via our postal address above. Please mark the envelope 'Data Protection Officer'.

### How do we get information?

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- you have made an information request to us by letter or email;
- you wish to attend, or have attended, an event;
- you have applied for employment with SSCL;
- you are representing your organisation; or
- you are a current or former member of SSCL Staff.

We also receive personal information indirectly, in the following scenarios:

- an employee of ours gives your contact details as an emergency contact or a referee; or
- we process your data on behalf of a data controller or a 3rd party.

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## 1. Your Data Protection Rights

Under data protection law, you have rights we need to make you aware of.

The rights available to you depend on our reason for processing your information. Please note that, in all cases where we act as a processor on behalf of another controller, we may redirect your request to the owner of your information, e.g. If you are an employee of a client, for whom we act as processor, then you will be redirected to your employer for them to take your request forward.

### Your right of access

You have the right to ask us for copies of your personal information. This right always applies. There are some exemptions, which means you may not always receive all the information we process.

### Your right to rectification

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies.

### Your right to erasure

You have the right to ask us to erase your personal information in certain circumstances.

### Your right to restriction of processing

You have the right to ask us to restrict the processing of your information in certain circumstances.

### Your right to object to processing

You have the right to object to processing if we process your information because the process forms part of our legitimate interests.

### Your right to data portability

This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another or give it to you. The right only applies if we are processing information based on your consent or under a contract, or in talks about entering a contract and the processing is automated.

You are not required to pay any charge for exercising any of your rights and we have one month to respond to you.

Please contact us at [dpo.uk@soprasteria.com](mailto:dpo.uk@soprasteria.com) if you wish to make a request.



## 2. Request a Service Adjustments

### Service Adjustments

SSCL where possible will make reasonable adjustments for disabled people.

We will create a record of your adjustment requirements. These will give your name, contact details and type of adjustment required, along with a brief description of why it is required. Relevant staff can access this to ensure they are communicating with you in the required way. Our processing of special category data, such as health information you give us, will be based on GDPR article 9(2) (a), which means we need your consent.

### What are Your rights

As we need your consent to process your special category data you have a right to withdraw your consent at any time.

For more information on your rights, please see [‘Your rights as an individual’](#).

## 3. Sharing Your Information

We will not share your information with any third parties for the purposes of direct marketing unless the data has been gathered for that purpose and is explained in the [Marketing](#) section.

We use data processors who are third parties who provide elements of services for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

In some circumstances we are legally obliged to share information. For example, under a court order or where we cooperate with Information Commissioners Office. In any scenario, we’ll satisfy ourselves that we have a lawful basis on which to share the information and document our decision making and satisfy ourselves we have a legal basis on which to share the information.

## 4. Links to Other Websites

Where we provide links to websites of other organisations, this privacy notice does not cover how that organisation processes personal information. We encourage you to read the privacy notices on the other websites you visit.

## 5. Your Right to Complain

We work to high standards when it comes to processing your personal information. If you have queries or concerns, you can make a complaint to [dpo.uk@soprasteria.com](mailto:dpo.uk@soprasteria.com) and we will respond.

If you remain dissatisfied, you can [make a complaint](#) to the UK supervisory authority the Information Commissioner's Office about the way we process your personal information.

## 6. Children's Information

We do not provide services directly to children or proactively collect their personal information.

## 7. How You Contact Us

### Social media

We only use social media to deliver messages and do not gather personal data from this. Please refer to the privacy policy of the social platform you are using.

### Emailing us

We use Transport Layer Security (TLS) to encrypt and protect email traffic in line with government guidance on email security. Most webmail such as Gmail and Hotmail use TLS by default.

We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. You must ensure that any email you send is within the bounds of the law.

For general contact please use our "[contact us form](#)".

## 8. Visitors to our Website

### Analytics and cookies

The main SSCL website uses Google analytics to allow us to measure how the site is used and to improve the service, however these will not be turned on automatically and you will be asked if you would like to accept these cookies when you visit the site, you can opt out at any time.

More on how Google Analytics uses cookies to measure user-interactions on websites - [Privacy Policy - Privacy & Terms - Google](#)

### Google analytics opt out

To stop Google collecting this information, use the following link to opt out of all Google analytics.

Google Analytics opt out - [Google Analytics Opt-out Browser](#)

### Cookie Policy

Link to SSCL cookie policy - [Cookie Policy - SSCL](#)





## 9. Visitors to the Office

We meet visitors at our offices, including:

- external training providers;
- job applicants;
- suppliers and tradespeople;
- stakeholders; and
- event attendees.

If your visit is planned, we will send your name and visit information to reception before your visit. On arrival you will be given a visitor badge. You must wear this visitor badge throughout your visit.

We ask all visitors to sign in and out at reception and show a form of ID. The ID is for verification purposes only, we do not record this information.

The main purpose for processing this information is security and safety reasons. The legal basis upon which we rely to process your personal data is article 6(1)(f) of the GDPR, which allows us to process personal data when it's necessary for the purposes of our legitimate interests.

Where CCTV is used within our offices premises this is clearly signposted. Where any CCTV used on our office premises is not operated by us, we are not the controller. It will be under the control of the relevant building landlord. Where this is the case, we will help ensure that the data controller receives any Data Access request that is submitted to us.

We may require visitors to show some form of ID, but this will not be recorded anywhere and is purely for ID verification.

## 10. Managing Your Data

### 10.1 You have made an information request to us by letter, email

#### **Purpose and legal basis for processing**

Our purpose for collecting this information is so we can facilitate your enquiry.

The legal basis upon which we rely for processing your personal data is processing is necessary for the purposes of the legitimate interests pursued by the controller GDPR Chapter 2 Article 6 (1) (f).

It is in our legitimate interest and the data subject's legitimate interest that we respond to the enquiry.

If the enquiry is exercising one of the data subject's rights the justification will be processing is necessary for compliance with a legal obligation to which the controller is subject; GDPR Chapter 2 Article 6 (1) (c).

## What we need

Enough personal data to understand and deal with the nature of your enquiry or facilitate your visit.

## Why we need it

We need enough information to establish your identification depending on the circumstances of your interaction with us.

## What we do with it

The data we gather will only be used for the purpose for which it was gathered. If your contact was an enquiry, we may further process your basic contact details for a customer satisfaction survey to establish how well we handled your contact with us.

## What are your data protection rights?

You have the right to have your data erased at any time and you can object to any processing which is accomplished under Legitimate Interest.

More information on your data protection rights

## Do we use any data processors?

Yes - Sopra Steria is a processor for us as a provider of our IT and support - <https://www.soprasteria.com/footer/personal-data-protection-charter>

## 10.2 You have applied for employment with SSCL

### Purpose and legal basis for processing

Our purpose for processing this information is to assess your suitability for a role you have applied for.

The legal basis upon which we rely for processing your personal data is article 6(1)(b) of the GDPR, which relates to processing necessary to perform a contract or to take steps at your request, before entering a contract. The legal basis upon which we rely to process any information you provide as part of your application which is special category data, such as health, religious or ethnic information is article 9(2)(b) of the GDPR, which also relates to our obligations in employment and the safeguarding of your fundamental rights and article 9(2)(h) for assessing your work capacity as an employee' and Schedule 1 part 1(1) and (2)(a) and (b) of the DPA2018 which relates to processing for employment, the assessment of your working capacity and preventative or occupational medicine.

### What will we do with the information you give us?

We will use all the information you provide during the recruitment process to progress your application with a view to offering you an employment contract with us, or to fulfil legal or regulatory requirements if necessary.

We will not share any of the information you provide with any third parties for marketing purposes.

We will use the contact details you give us to contact you to progress your application.

We will use the other information you provide to assess your suitability for the role.







## **What information do we ask for, and why?**

We do not collect more information than we need to fulfil our stated purposes and will not keep it longer than necessary.

The information we ask for is used to assess your suitability for employment. You do not have to provide what we ask for, but it may affect your application if you don't.

## **Application stage**

If you use our online application system, your details will be collected by a data processor on our behalf.

We ask you for your personal details including name and contact details. We will also ask you about previous experience, education and for answers to questions relevant to the role. Our recruitment team will have access to all this information.

You will also be asked to provide equal opportunities information. This is not mandatory – if you do not provide it, it will not affect your application. We will not make the information available to any staff outside our recruitment team, including hiring managers, in a way that can identify you. Any information you provide will be used to produce and monitor equal opportunities statistics.

## **Shortlisting**

Our hiring managers shortlist applications for interview. They will be provided with all the data that was collected at the application stages – except for the equal opportunities monitoring information.

## **Assessments**

We may ask you to participate in tests or an occupational personality profile questionnaire, attend an interview, or a combination of these. Information will be generated by you and by us. For example, you might complete a written test, or we might take interview notes. This information is held by us.

## **Conditional offer**

If we make a conditional offer of employment, we will ask you for information so that we can carry out pre-employment checks. You must successfully complete pre-employment checks to progress to a final offer. We must confirm the identity of our staff and their right to work in the United Kingdom, and seek assurance as to their trustworthiness, integrity, and reliability.



### **You must therefore provide:**

- proof of your identity – you will be asked to attend our office with original documents; we will take copies;
- proof of your qualifications – you will be asked to attend our office with original documents; we will take copies;
- a criminal records declaration to declare any unspent convictions;
- your email address, you will be contacted by SSCL BPSS security to complete an application for a Basic Criminal Record check via the Disclosure and Barring Service, or Access NI, which will verify your declaration of unspent convictions; and
- contact details of the referees you wish to use in support of your application.

In addition, we will:

- contact your referees, using the details you provide to us, directly to obtain references; and
- ask you to complete a questionnaire about your health to establish your fitness to work.

### **If we make a final offer, we will also ask you for the following:**

- bank details – to process salary payments; and
- emergency contact details – so we know who to contact in case you have an emergency at work.

### **Before or just after appointment**

Some roles require a higher level of security clearance – this will be clear on the advert or job description (or both). If you are required to have a National Security Vetting prior to the commencement of your role, it will be managed between SSCL and United Kingdom Security Vetting (UKSV). The UKSV will tell us whether your application is successful or not. If it is not, we will not be told the reasons, but we may need to review your suitability for the role or how you perform your duties. UKSV will process your data directly as a Data Controller. Information on this can be found here <https://www.gov.uk/government/organisations/united-kingdom-security-vetting>

Our Code of Conduct requires all staff to declare if they have any potential conflicts of interest, if you complete a declaration, the information will be held on your personnel file. You will also need to declare any secondary employment.

### **How we make decisions about recruitment**

Final recruitment decisions are made by hiring managers and members of our recruitment team. We take account of all the information gathered during the application process. You can ask about decisions on your application by speaking to your contact in our recruitment team.



## Your data protection rights

As an individual, you have certain rights regarding your own personal data.

For more information on your data protection rights, please see 'Your rights as an individual'.

## Do we use any data processors?

Yes

We use Cornerstone Applicant tracking system to provide elements of our recruitment service for us

<https://www.cornerstoneondemand.com/client-privacy-policy/>

We use Intelligent Resourcing via Sopra Steria to manage aspects of the recruitment and HR process

[Compliance with GDPR \(intelligent-resource.com\)](https://www.soprasteria.com/footer/personal-data-protection-charter)

<https://www.soprasteria.com/footer/personal-data-protection-charter>

We use Health Management Ltd to provide our Occupational Health service.

We will send you a link to the questionnaire that will take you to Health Management Ltd website. The information you provide will be held by Health Management, who will give us a fit to work certificate or a report with recommendations. You can request to see the report before it is sent to us. If you decline for us to see it, this could affect your job offer. If an occupational health assessment is required, this is likely to be carried out by Health Management Ltd.

### Health Management Ltd data-protection

Any recruitment agents are considered data controllers of the data they hold. If you were engaged via a recruitment agency you should look at their privacy notice.

## 10.3 You are representing your organisation

### Purpose and legal basis for processing

We hold the names and contact details of individuals acting in their capacity as representatives of their organisations across the business (business cards & outlook contacts etc). If the interactions relate to suppliers, contracts, buildings management, IT services etc., the legal basis is article 6(1)(c) of the GDPR for any legal obligation or article 6(1)(f) because the processing is within our legitimate interests as a business.

## What we need

We hold the names and contact details of individuals acting in their capacity as representatives of their organisations across the business (business cards & outlook contacts etc).

If we are using your data to provide you with marketing information, we need a valid email address.

## Why we need it

To facilitate our working relationship with you, or to provide you with relevant marketing material.

## What we do with it

The data will be held on a stakeholder list dependant on the relationship we have with you. These lists will be updated periodically to ensure accuracy where necessary.

You can be removed from our marketing emails by [contacting us](#) to opt out.

## Do we use any data processors?

SSCL does not currently use any data processors for this activity.

## 10.4 You are a member of SSCL staff

For current or former SSCL staff (including contractors) there is a separate internal privacy statement that relates specifically to their interests which is available on the staff intranet. If you are a former member of SSCL staff and wish to obtain a copy of the internal privacy statement that applies to your data, please [contact us](#).

## 10.5 An employee of ours gives your contact details as an emergency contact or referee for employment

### Purpose and legal basis for processing

The Purpose of processing this data is to ensure the safety of our staff or business, in accordance with article 6(1)(f) of the GDPR because the processing is within our legitimate interests as a business.

### What we need

If you are named as an emergency contact, we collect name, contact details and relationship.

For referees we collect name, contact details, name of employer and relationship.

### Why we need it

For referees, to verify the details someone who has applied for a post.

If you are named as an emergency contact, to inform you in the case of an emergency.

### What we do with it

Hold it only for the purpose it was gathered for it will not be shared with any 3rd parties unless it is strictly necessary and is in the vital interests of the data subject.

### Do we use any data processors?

SSCL does not currently use any data processors for this activity.





## 10.6 We process your data on behalf of a data controller or a 3rd party

### Purpose and legal basis for processing

SSCL Provides the following services to 3rd party businesses for the purpose of administrating HR and Finance activities:

- recruitment services;
- employee HR;
- contact centre;
- payroll;
- financial management;
- business intelligence;
- IT support;
- document management services; and
- pension administration.

Further information on the services is available on our site [SSCL's Services](#).

The legal basis upon which we rely to process in these instances comes from the data controller or client. There is a link to our data controllers [here](#).

### What we need

The data we require will be specified in our contract or written instructions with the data controller.

### Why we need it

We need information from you to fulfil our obligation under the contract with the data controller.

### What we do with it

SSCL will only process your data in accordance with the instructions issued to it by the relevant controller, unless otherwise required to do so by relevant law.

### How long we keep your data

We will retain the data for as long as is stipulated in the contract with the data controller.

At the end of the retention period, your personal data will be disposed of securely.

At the end of the contract with the controller, SSCL as the data processor will delete or return all the personal data to the controller.



### What are your data protection rights?

You can apply any of your rights under GDPR Articles 12 - 23. These should be requested directly with the data controller, however if you do request one of your rights through SSCL we will work directly with the data controller on your behalf so that they can service your request in a timely manner.

[More information on your data protection rights](#)

### Do we use any data sub-processors?

Yes - we use several sub-processors to provide elements of our service to the data controllers. These sub-processors vary depending on the data controller for whom we are processing. The sub-processors are authorised by the data controller and the same obligation exist in the contracts to ensure appropriate organisational and technical measures meet the requirements of the applicable data protection legislation.

## 11. Marketing

SSCL use indirect marketing and the main types of this are, search engine optimization (SEO), content marketing, PR, social media, and referrals. SSCL may also contact existing clients to highlight the services we offer, this may involve using business contact details to email key stakeholders that both engage with/sit on the boards with us, however we do not share this detail with any 3rd parties.

## 12. Data Retention

We will retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

## 13. Changes to this Privacy Notice

We keep our privacy notice under regular review to make sure it is up to date and accurate. Last reviewed August 2022.

Version Number	Date	Approved by
V1	August 2022	<p><b>Juliet Norris</b> - Director of Information Governance and Counter Fraud, Group Caldicott Guardian</p> <p><b>Ruth Walkden</b> - SSCL Data Protection Officer</p>

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