

Veritau Corporate Privacy Notice

Veritau is committed to complying with its obligations under the Data Protection Act in order to protect the confidentiality, integrity and availability of personal data. This privacy notice explains why we process personal data and what we do to keep it secure. There are separate privacy notices covering a number of other situations where Veritau is a data controller (for example when it collects data as part of its recruitment activities or it holds data in respect of its employees).

Who we are?

The Veritau group consists of Veritau Limited and Veritau North Yorkshire Limited. The companies are owned by a group of local authorities (including North Yorkshire County Council, the City of York Council and four district councils). Veritau provides services to a number of public sector organisations, including local authorities, schools, housing associations and council owned companies. The services include:

- Internal audit – the review of governance arrangements, and financial and operational processes within our client organisations
- Counter fraud – the provision of advice and support to client organisations to help prevent and detect fraud, and the investigation of suspected fraud
- Information governance – the provision of advice and support to help client organisations comply with data protection and access to information legislation
- Risk management – the provision of advice and support to help client organisations manage their risks

To enable these services to be delivered effectively, Veritau processes personal data on behalf of its client organisations. This means that Veritau must comply with section 59 of the Data Protection Act 2018 (which sets out the obligations on data processors).

Veritau also processes personal data about our clients and the people who work for these clients. In this respect, Veritau is therefore a 'data controller' as defined by Article 4 (7) of the General Data Protection Regulation (GDPR). This means that we determine the purposes for which, and the manner in which, the personal data is processed. We have a responsibility to our clients and their personal data, and will only collect and use this personal data in ways which are compliant with data protection legislation.

Veritau has appointed **Robert Beane** as its Data Protection Officer. The Data Protection Officer's contact details are:

Information Governance Office
Veritau
County Hall

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Racecourse Lane
Northallerton
DL7 8AL

Email - information.governance@veritau.co.uk

Telephone - 01609 53 2526

What data do we process?

To deliver the services for our clients, Veritau processes personal data, including some special category data. Names, contact and address details are recorded on Veritau's databases but we only process personal data that is necessary to deliver our services. The data processing we undertake is covered by contractual agreements with our clients.

We also process information about our clients and the people who work for these clients to ensure the efficient and effective delivery of our services. The information we process may include, but is not limited to, personal identifiers (names, post titles etc) and other contact information (work email addresses and telephone numbers). The personal information may relate to councillors, directors, trustees, employees and/or agents of our clients. The information is collected directly from our clients or from other public sources (for example organisational websites and published documents) as part of the ongoing delivery of our services.

What is Personal Data?

Personal data is any information that relates to or can be used to identify a living individual. For example this could be names and contact details.

What is 'Special Category' Personal Data?

Some personal data is more sensitive and therefore needs extra protection to keep it safe. It is often information that is very personal to the data subject, such as:

- Sexuality or sex life,
- Race or ethnicity,
- Physical or mental health,
- Political views
- Trade union membership,
- Genetic or biometric data (DNA and thumbprints etc)
- Criminal history

Why do we process personal data?

We only process personal data so that we can deliver, manage, and check the quality of services that we provide to our client organisations. We ask our client organisations to only share personal data with us where it is required for the purpose

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of delivering our services. We also ask our client organisations to provide information to their data subjects about this processing activity.

What is our lawful basis for processing personal information?

As a data processor, Veritau relies on the lawful bases used by our clients to process personal data. There are a number of lawful reasons for which our clients may collect and use personal data. In line with Articles 6 and 9 of GDPR this is likely to include consent, performance of a contract, to fulfil a legal obligation or as part of their public task.

Veritau also processes information about our clients in order to fulfil our contractual obligations with these clients. This is in line with Article 6 (1)(b) of GDPR.

Who has access to personal data within Veritau?

We take the security of all the personal data we process very seriously. We have a framework of policies, procedures and training in place covering data protection, confidentiality and information security. We also regularly review the appropriateness of the measures we have in place to keep the data we hold secure. Veritau employees may only access personal data if they require it to deliver a service to our clients.

Who do we share personal data with?

To support the delivery of services to our clients, Veritau uses a number of third party organisations to provide specific functions and services. For example, the IT infrastructure is provided by the City of York Council, the website is hosted by North Yorkshire County Council and Experian provides credit search facilities. These organisations may have access to the personal data we are holding in order to complete their work. Veritau's auditors, insurers, legal advisors and Data Protection Officer may also have access to the personal data we are holding. For example, we may need to disclose personal data to our insurers in the event of a claim.

Where Veritau uses a third party organisation we ensure contractual agreements and appropriate security measures are in place to keep the personal data secure.

Veritau may also be required to share the personal data we are holding with other organisations. This could be because of a legal requirement or because of a court order. For example, Veritau may need to share information with the police, government departments or other agencies to help prevent or detect a crime. We will only share personal data in such circumstances where there is a legal or regulatory duty to do so. We will also keep a record of what personal data has been disclosed and the lawful basis for that information being shared.

Veritau does not share personal information about our clients with other parties unless the information is already in the public domain.

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How do we protect personal data?

Veritau is committed to keeping the personal data that it holds safe from loss, corruption or theft. It has a number of measures in place to do this including:

- Training for all employees on how to handle personal data
- Policies and procedures detailing what employees can and cannot do with personal data
- Appropriate IT security safeguards such as firewalls, encryption, and anti-virus software
- Physical security measures to protect documents and electronic equipment.

How long do we keep personal data for?

Veritau will only keep personal data for as long as it is required to fulfil a legal obligation or if we have an organisational need to do so. Where Veritau is acting as a data processor, agreements are in place with our clients setting out how long we should keep different categories of personal data.

Veritau will only keep personal data about our clients for as long as it is required to fulfil our contractual obligations or if we have an organisational need to do so. Veritau maintains a document retention and disposal schedule which sets out the period of time information is kept for.

Do we transfer personal data outside of the European Union?

Generally the personal data that Veritau processes is all held within the United Kingdom. However, some information may be held on computer servers which are located within other European Union countries. We will take all reasonable steps to ensure personal data is not processed in a country that is not seen as 'safe' by the UK government. If we do need to send personal data out of the European Union we will ensure it has extra protection from loss or unauthorised access.

If you are a Data Subject what are your rights?

As a data subject, the Data Protection Act 2018 gives you a number of rights with regards to your personal information. These include:

- to be informed about how we process your personal data. This notice fulfils this obligation
- to request access to your personal data that we hold, and be provided with a copy of it
- to request that your personal data is amended if inaccurate or incomplete
- to request that your personal data is erased where there is no compelling reason for its continued processing
- to request that the processing of your personal data is restricted
- to object to your personal data being processed

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- to object to automated decision making and profiling

Where Veritau is acting as a data processor we will pass any such request to the relevant client organisation and inform you of this. It will then be for the client to make a decision regarding the above, in their capacity as Data Controller.

If you are a councillor, director, trustee, employee or agent of one of our clients you should send your request to our DPO at the address provided above.

How do I complain about the way in which Veritau has handled my personal data?

If you have concerns about the way in which Veritau has processed your personal data then please contact our Data Protection Officer (see contact details above). We aim to reply to any complaints promptly and within the statutory time limits.

If we cannot resolve your concerns, you may also complain to the Information Commissioner's Office (the Data Protection regulator) about the way in which Veritau has handled your personal data. You can do so by contacting:

First Contact Team
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow Cheshire
SK9 5AF

Email - casework@ico.gsi.gov.uk

Telephone - 03031 23 1113

www.ico.org.uk

Changes to this privacy statement

We recognise that transparency and data protection are ongoing responsibilities so we will keep this privacy statement under regular review.

This privacy statement was last updated on 21 August 2018.

Other Processing Activity

Veritau will process personal data in a number of other situations. Separate privacy notices have therefore been prepared for:

Directors and employees
Recruitment applicants
Suppliers