



GENERAL PRIVACY NOTICE

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1 INTRODUCTION

- 1.1 We are committed to protecting and respecting your privacy. Integrated Care Support Services is a non-profit company, limited by guarantee. In this privacy notice, references to “we”, “us”, “our”, or “ICSS” is a reference to Integrated Care Support Services Limited.
- 1.2 This privacy notice deals with any personal data we may process. It sets out the basis on which any personal data we collect is handled by us in the course of our relationship with you. For example, this notice applies to you if you are a potential or actual participant on one of our courses or programmes, a current or potential partner, supplier or potential supplier, alumni, representative from an organisation taking part in our courses or programmes or a representative from an organisation eligible to take part in our courses or programmes.
- 1.3 Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.
- 1.4 For the purposes of the General Data Protection Regulation 2016/679 (“GDPR”), Integrated Care Support Services is the data controller and the registered office is 6 Pilsdon Close, London, SW19 6DR.
- 1.5 If you are reading this privacy notice online, we recommend that you print and retain a copy for future reference.

2 INFORMATION WE COLLECT ABOUT YOU

Information you give us

- 2.1 You may give us personal data about you, in a number of ways; these include:
- Through our website or via another third party organisation
 - Visiting our office
 - During interview or meeting
 - Sending information directly to us, or providing information as requested by us and/or which is necessary from time to time
 - Publicising information into public domain including on a website
 - Information you give us may include the following information about you:
 - Your name;
 - Photo;
 - Salary and employment information;

- Contact details (including home or work address, e-mail address (work and/or home), and mobile, home and/or work phone number);
- Financial information (for example payee details);
- Previous educational records and achievements;
- Information required for complying with our safeguarding procedures;
- References (as an applicant or potential supplier).

Technical information we collect about you when you visit our website

2.2 With regard to each of your visits to our website we may automatically collect the following information:

- Technical information, including the Internet Protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
- Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time); pages you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our number.
- Our website may contain links to and from the websites of our partner networks, funders, advertisers, suppliers and affiliates. If you follow a link to any of these websites, please note that these websites are not covered by this notice and may have their own privacy notices. We do not accept any responsibility or liability for these notices. Please check these third party notices before you submit any personal data to these websites.

Information we receive from other sources

We may be working closely with third parties (including, for example, current and previous employers, partners, payment and delivery services) and may receive information about you from them.

3 CONTACT US

- Questions, comments and requests regarding this privacy notice are welcomed and should be addressed to our Data Protection Officer, Melanie Ashdown (m.ashdown@nhs.net) at Integrated Care Support Services, 6 Pilsdon Close, London, SW19 6DR.

4 USES MADE OF THE INFORMATION

Information you give to us

- We will use the information you give to us to pursue the following legitimate interests (as applicable to our relationship with you):
- Promote the objects and interest of our courses and programmes, ensure the most efficient management of Integrated Care Support Services and ensure that our legal obligations are adhered to;
- To store this information on our management information system/s;
- To enforce our terms of use with you or any other contract we may have with you;
- For the purposes of recruitment;
- To enable us to receive your services
- To enable you or other people from your organisation to take part in the programmes and courses we offer. In order to pursue the legitimate interests referred to above in section 4 we may rely on software applications and other technology to process personal data about you. These include

databases and our finance systems. The third parties we use to deliver these applications are carefully chosen and vetted by us to ensure that, among other things, your information is kept secure.

- We will also use the information you give to us as is necessary to carry out our obligations arising from the contract (or potential contract) between you and us and to provide you with the information and services that you request from us or receive the services we request from you. For example, we may be engaging you for a role at Integrated Care Support Services, or engaging you to supply us with services and will use personal data where necessary to recruit you or receive your services.
- In addition, we may be required by law to do the following (which is not an exhaustive list):
- keep an accounting record of payment; and
- keep a record to evidence fair recruitment/engagement processes.
- Inevitably, there will be an overlap between what we do that is necessary to (a) perform our contract with you, (b) carry out our legal obligations and (c) pursue a legitimate interest although we have tried our best to demarcate these as set out above. If you have any questions about these please contact our Data Protection Officer (see section 3).

Information we may collect about you from our website

- We will use this information for the following legitimate interests:
- To contact you or your organisation if you have made an enquiry about one of our current, past or future courses or programmes or if you would be eligible to do so;
- To administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- To improve our website to ensure that content is presented in the most effective manner, and your online experience is as effective and appropriate as possible, for you and for your computer;
- As part of our efforts to keep our website safe and secure.

Information we receive from other sources

- We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for one of the purposes set out above (depending on the types of information we receive). For example, we may receive a reference from a previous employer relating to you, which may impact a recruitment decision and we may collect details of your dietary needs from your organisation to enable us to ensure these are met as appropriate when you are taking part in one of our programmes and refreshments are provided.

When we disclose information

- In order to pursue one of the legitimate interests set out above, we may share your personal information with:
- People engaged to work on behalf of Integrated Care Support Services for example our Freelance Facilitators;
- partners, professional advisors, suppliers and sub-contractors for the performance of any contract or agreement we enter into with them or you.
- We may disclose your personal information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce our contract (between us and you) and other agreements.

Where we need to get your consent

We will not market our services to you (other than in accordance with paragraph 4 above) without your consent and you have the right to ask us not to use your contact details for marketing. Please contact us if you no longer wish to be contacted by us.

5 YOUR RIGHTS

Under the GDPR, you have the following rights:

- **Right to correction.** You have the right to have inaccurate personal data about you rectified.
- **The right to erasure.** You have the right to request that we delete your personal data where: (a) the personal data is no longer necessary in relation to the purposes for which it was collected or processed; (b) you withdraw your consent to processing for which we previously obtained your consent; (c) you object to the processing and, as a result, we agree to cease that processing; (d) the personal data has been unlawfully processed; and (e) we are required to erase the personal data in order to comply with the law.
- **Right to restriction.** You have the right to obtain from us the restriction of processing where: (a) you contest the accuracy of the personal data we hold about you; (b) the personal data has been unlawfully processed; (c) we no longer need the personal data but they are required in limited circumstances; and (d) you object to the processing and, as a result, we agree to cease that processing
- **Right to request transfer.** In certain circumstances, you have the right to receive personal data from us in a structured, commonly used and machine-readable format and the right to transmit it to a third party organisation.
- **Right to object.** You have the right to raise an objection to any of our processing. Please tell us if you object to any type of processing that we do and we will work with you to address any concerns you may have.
- **Right to object to marketing.** If you do not want us to process your personal data for direct marketing, please tell us and we will ensure that we no longer do this.
- **Right to complain to the ICO.** Whilst we would always prefer it if you approached us first about any complaints or queries you may have, you always have the right to lodge a complaint with the Information Commissioner's Office.
- **Right to request access.** You have the right to access personal data we hold about you. Please contact our Data Protection Officer if you wish to do so at m.ashdown@nhs.net

5 HOW LONG WE KEEP PERSONAL INFORMATION

- We will not keep any personal data about you for any longer than is necessary for the purposes for which the personal data are processed.
- We follow a personal data retention policy which determines how long we keep specific types of personal information for. For further information about the criteria we use to determine what periods we keep specific information, please contact our Data Protection Officer (see paragraph 3).

7 USE OF OUR WEBSITE

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

8 CHANGES TO OUR PRIVACY NOTICE

Any changes we make to this privacy notice in the future will be posted on our website and, where possible and appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy notice.