N3i Privacy Notice

The purpose of this Privacy Notice is to tell you what we do with your personal data, why we use it, who we share it with, and how long we keep it. The type of data we hold on you and what we do with it will depend on the type of relationship you have with N3i. For both our staff information, as well as our customers personal data, N3i are the Data Controller as defined by the Data Protection Act.

Who are we?

N3i are a registered company based at Aura Innovation, Centre, Bridgehead Business Park, Meadow Road, Hessle, HU13 0GD, providing IT services to a range of customers across the Humber area. We take Data Protection very seriously and have appointed Barry Jackson, Head of Information Governance to be our Data Protection Officer. In addition, we have appointed a Senior Information Risk Owner.

We are committed to protecting your privacy and will only process personal confidential data in accordance with the UK General Data Protection Regulation, the Data Protection Act 2018, the Common Law Duty of Confidentiality, Professional Codes of Practice and the Human Rights Act 1998.

How do we keep your information safe?

All identifiable information that we hold about you will be held securely and confidentially. We use administrative and technical controls to do this. Along with all health and social care organisations we are required to provide annual evidence of compliance with applicable laws, regulations and standards through the NHS Data Security and Protection Toolkit.

How to contact us

If you have any comments or complaints about this notice, please contact the N3i DPO Team, Aura Innovation Centre, Bridgehead Business Park, Meadow Road, Hessle, HU13 0GD, e: n3i.dpo@nhs.net | t: 0300 002 0001

Staff Data

What we collect, use and why

N3i maintain records about our staff in order to be able to manage staff in accordance with Employment Law. Many of these records are held locally within N3i by line managers. N3i also have a contract in place with City Health Care Partnership CIC (CHCP) to provide a full HR service for staff and this data will also be shared with them for this purpose. The data will include:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses
- Dates of birth, marriage and divorce
- Gender
- Marital status and dependants
- Next of kin, emergency contact and death benefit nominee(s) information
- Bank account details, payroll records and National Insurance number
- Salary, annual leave, pension and benefits information
- Copy of driving licence, passport, birth and marriage certificates, decree absolute.
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process)
- Performance and appraisal information
- Disciplinary and grievance information
- Secondary employment and volunteering information
- Evidence of your right to work in the UK/immigration status.

Customer Data

What we collect, use and why

N3i maintain records that relate to all our customers for the purpose of providing services to them. In this context the term customers will include all staff who work across Primary Care in GP Practices or Pharmacies in the Humber and North Yorkshire ICB covered by the N3i contract.

It will also cover staff in the Humber and North Yorkshire ICB who have a working relationship with N3i. Also included will be all staff of customers of N3i who have a contractual relationship with the company. This information will include personal data such as:

- Contact details such as name, title, addresses, telephone numbers, and email addresses
- Place of work and job role/title
- Data related to network/computer log in including password stored in encrypted format
- Data related to activity on N3i network such as times of log in
- Data related to provision of NHS Smartcards service
- Data relating to calls made to the N3i ServiceDesk
- Training records where appropriate.

We use information held about you in the following ways:

- To provide you with information, services that you request from us
- To carry out our obligations arising from any contracts entered between you and us
- We may also use your data to provide you with information about goods and services which may be of interest to you, and we may contact you about these by email, SMS, post or telephone.

Service Desk

N3i operate a shared Service Desk with CHCP. Staff from both organisations process calls and data from either organisation. All calls to the Service Desk are recorded as follows:

- Recordings are retained for 90 days before being automatically deleted
- Access is restricted to telephone system administrators
- A recorded message informs all callers that “all calls are recorded for training and quality purposes”
- The Lawful basis for this is Legitimate Interests (Article 6(1)(f))

Where we get personal information from

- People directly
- Previous employers

Lawful bases

Our lawful bases for collecting or using personal information to **provide services and goods** are:

- Contract

Our lawful bases for collecting or using personal information for **the operation of customer accounts and guarantees** are:

- Consent
- Contract

Who we share information with

We will only share your data where there is a clear legal basis, or you give us your consent to do so. We will not sell or use your data for marketing purposes.
On occasions, we may have to share information with:

- City Health Care Partnership CIC (CHCP) for the provision of HR, Contracting, Procurement & Finance services
- Relevant regulatory authorities
- External auditors or inspectors
- Organisations we're legally obliged to share personal information with
- Emergency services (where necessary)
- Publicly on our website, social media or other marketing and information media (where appropriate)

How long we keep your information

The Data Protection Act permits us to hold your data as long as deemed necessary.

Staff data will be retained in accordance with the length of time set out in appropriate Employment Law.

Customer data will be retained for a maximum of one year after you cease to have an operational connection with us.

Your data protection rights

Under data protection law, you have rights including:

- **Your right of access** - You have the right to ask us for copies of your personal data.
- **Your right to rectification** - You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure** - You have the right to ask us to erase your personal data in certain circumstances.
- **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal data in certain circumstances.
- **Your right to object to processing** - You have the right to object to the processing of your personal data in certain circumstances.
- **Your right to data portability** - You have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances.
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent.
- You don't usually need to pay a fee to exercise your rights. If you make a request, we have one calendar month to respond to you.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:
Information Commissioner's Office
Wycliffe House, Water Lane
Wilmslow, Cheshire, SK9 5AF

Helpline number: 0303 123 1113
Website: https://www.ico.org.uk/make-a-complaint