

Participant ID No (CMS ID):

## WH101 Privacy Statement

### Information we collect about you.

- Personal and contact information when you are referred to us by Department of Work and Pensions/Jobcentre Plus, including your name, address, email address, telephone number(s), National Insurance Number, financial profile, health information, ethnicity, employment history, title, date of birth and gender. We may collect or generate additional information about you during your induction and throughout the provision of the programme.
- We record reference numbers of documents you provide as proof of your identity when you are referred to us, or where there is a legal reason to request this from you, (e.g., Passport, Driving Licence).
- Details (and copies) of your communications and interactions with us via our Service Delivery Team or otherwise, including by email, telephone (voice recordings), SMS (text) and post.
- Information about how you use our website, and if applicable, which websites you were redirected from.
- We may also receive personal data directly from you, or from public sources, including from social media channels (if you interact with us through those channels), or other third parties including employers or recruitment agencies.

### Keeping your Data Secure

- Seetec Pluss has appropriate technical and organisational measures in place for compliance with data protection law, to keep your data safe.
- We are independently certified to industry recognised standards, including ISO27001:2013, which helps us maintain the highest level of security.
- For DWP programmes your data is not transferred or processed outside of the UK.

## How and why, we use your personal data

The table below explains the purpose and legal basis for processing your personal data.

	How we use your personal data	Why we use your personal data
Referral from DWP/ Job Centre Plus	We use your personal and contact information to register you onto the programme. Your details are kept securely in our client management database	Contractually necessary for us to deliver mandatory or voluntary services to you.  Information transferred to us by the DWP/Jobcentre Plus is stored and processed under the lawful basis of Public Interest or "Public Task".
Verification of Identity	Where necessary we will record document reference numbers (such as Passport or Driving Licence) to verify your identity.	Necessary for compliance with a legal or contractual obligation.
Eligibility	Where necessary we may record document reference numbers (such as Passport or Driving Licence) to verify your eligibility	Necessary for compliance with a legal or contractual obligation.
Staff training	We may use copies of your communications with us (including voice recordings) for staff training, quality, and monitoring purposes	Necessary for our legitimate interests (to ensure that we can provide the best service to you).
Service delivery	Whilst on programme, we will use your personal information to verify your identity. To communicate with you (by email, telephone, or text) in order to manage appointments, complete action plans and assessments, support your progression and to evidence our interactions	Contractually necessary for us to deliver mandatory or voluntary services.  Necessary to comply with a legal obligation.
Statistical/ Performance Analysis Purposes	We may use your personal data (pseudonymised) for statistical and performance analysis purposes	Performance of the contract (contractual obligations) or for our legitimate interest to improve service delivery.

## Sharing your personal information

As part of service delivery, we may be required to share the data we collect about you in the following circumstances:

- With supply chain partners who are contractually linked with the delivery of our programmes on our behalf. The partners that Seetec Pluss currently work with are - Maximus UK, Activate Learning, FedCap Employment, Portsmouth City Council, Prospect Training Services (Gloucester) Limited.
- With other third parties, if we are under a duty to disclose or to comply with any legal or regulatory obligation or request, such as with DWP (Department of Works and Pensions), or other regulatory authorities.
- External auditors – when auditing our systems and processes for the purposes of ensuring efficiency, or regulatory or contractual compliance.
- Law enforcement agencies or third-party security companies – where we have a legal obligation to disclose, such as part of an investigation or for the purpose of ensuring that we comply with the law and have adequate security measures in place.

## Sharing your personal information – with your consent

We may wish to share your information with other parties, such as prospective employers, recruitment agencies, training providers and support agencies, including health and wellbeing professionals. We will only share limited personal data with them and will always obtain your consent to do so. Further details are provided on form **WH102**.

## How long we keep your information.

- We will only keep your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal or contractual requirements.
- At the end of that retention period, and in accordance with contractual obligations, your data will either be deleted or anonymised (so that it can no longer be associated with you) for research or statistical purposes.
- To determine the retention period for personal data, in addition to the applicable legal requirements, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means.

**Document Retention.** The current retention period for the Work and Health Programme is 21 July 2032. Retention periods could be changed at any stage in the future, as required and updated by the DWP.

## **Data Protection Rights**

You have the right to ask us:

- Not to use your personal data for direct marketing
- Not to process your personal data where it is processed on the basis of legitimate interests, if there are no compelling reason for that process.
- To request access to the personal information held about you.
- For the information we hold about you to be rectified if it is inaccurate or incomplete.
- To stop any consent-based processing of your personal data after you withdraw that consent.
- In certain circumstances, to delete the personal data we hold about you (this is not an absolute right).
- In certain circumstances, for the processing of your information to be restricted and,
- In certain circumstances, for your data to be transferred to another controller,

If you have any questions relating to this Privacy Statement, you wish to withdraw or amend your consent, or you wish to exercise your data protection rights, please contact the Data Protection Officer:

[dataprotection@seetec.co.uk](mailto:dataprotection@seetec.co.uk)