

Privacy Policy

Effective date: 14th June 2023

Introduction

Factor 50 Ltd (“we”, “us”, or “our”) is dedicated to protecting personal data. We comply with the EU General Data Protection Regulation (GDPR). This Privacy Policy describes why and how we collect and use personal data and provides information about individuals’ rights. It applies to personal data provided to us by individuals themselves or by others. We may use personal data provided to us for any of the purposes described in this Privacy Policy or as otherwise stated at the point of collection.

Personal data means any information relating to an identified or identifiable natural (living) person. Factor 50 processes personal data for a number of reasons, and the means of collection, lawful basis of processing, use, disclosure and retention periods for each reason will differ.

Factor 50 Ltd are registered with the ICO (Registration number: ZA488135) and self-certify against the NHS Digital Data Security and Protection Toolkit (ODS: 8K896). More detail on the how we share data with our data processors can be found below in the section ‘Do we share personal data with third parties?’.

Who can you contact for privacy questions or concerns?

If you have questions or comments about this Privacy Policy or how we handle personal data, please contact **contact@factor-50.co.uk** or write to Factor 50, 4th Floor, Market Square House, St James St, Nottingham, NG1 6FG.

You may also contact the UK Information Commissioner’s Office at <https://ico.org.uk/concerns/> to report concerns you may have about our data handling process. Our ICO registration number is ZA488135.

How do we collect personal data?

Directly

We obtain personal data directly from individuals in a number of different ways. These can include from:

1. Business cards
2. Job applications
3. Office visits
4. Meeting attendances
5. Platforms we have built / maintain:
 - a) HelpMyStreet – find out more at www.HelpMyStreet.org

We may also obtain personal data directly when we are establishing a business relationship, or through performing professional services through a contract.

Indirectly

We obtain personal data indirectly from a number of sources. These can include from:

1. Recruitment services (such as agencies and former employers)
2. Bought-in marketing lists
3. Public registers
4. Framework agreements

5. Internet searches
6. News articles

We may also obtain personal data indirectly from our business clients. This will be in the event that our business clients engage us to perform professional services and personal data that they control will be shared as part of that engagement. For example, we may need to review workforce data that will inevitably contain personal data. Our services may also include processing personal data under our clients' control on our hosted cloud applications, which may be governed by different privacy terms and policies.

What are the categories of personal data that we collect?

We may obtain the following categories of personal data through either direct interactions, client engagements, suppliers, job applications or other situations including those described in this Policy.

Personal data

Personal data we commonly collect to conduct our business activities include:

1. Financial information of staff and suppliers (e.g. bank details)
2. Family and beneficiary details for insurance and pension planning services (e.g. names and dates of birth)
3. Professional details (e.g. career history, education, professional memberships)
4. Contact details (e.g. name, job title, contact number, email address, postal address)
5. Name, address and contact details for users of HelpMyStreet, including indirect users where help has been requested on their behalf. Go to www.HelpMyStreet.org for more information and a detailed HelpMyStreet privacy policy.

Special categories of personal data

We usually do not collect special categories of personal data about individuals. In the event that we do process special categories of personal data, it is with the explicit consent of the individual unless it is obtained indirectly for legitimate purposes. Examples of special categories of personal data we may obtain include:

1. Information provided to us by clients in the course of a professional engagement
2. Dietary restrictions or access requirements when registering for in-person events that reveal religious beliefs and/or physical health information
3. Personal identification documents that may reveal race or ethnic origin

Personal data relating to criminal convictions

We may obtain personal data about employees, contractors or any other individual providing services for us that reveals information about criminal convictions.

What are the lawful bases we use for processing personal data?

In order to process personal data we must have a lawful basis for doing so. We may depend on the following lawful bases when collecting and using personal data to perform our business activities and provide our services:

1. Legal obligations and public interests: We may process personal data to meet certain regulatory and public interest obligations or mandates

2. Legitimate interests: We may rely on legitimate interests based on our evaluation that the processing is fair, reasonable and balanced. Examples include:
 - Direct marketing – to deliver insights and knowledge we believe is welcomed by our clients, subscribers and those who have interacted with us
 - Provision of employee benefits such as eyecare vouchers – to raise staff morale and satisfaction
3. Consent – we may rely on your freely given consent
4. Contract – we may process personal data in order to preform contractual obligations

Why do we need personal data?

We will always endeavour to explain our rationale for collecting personal data and maintain transparency throughout. Reasons can include:

1. Providing our professional services
2. Providing professional advice and delivering reports related to our professional services
3. Promoting our professional services to existing and prospective business clients
4. Travel arrangement assistance
5. Seeking qualified candidates
6. Fulfilling employment or contractual obligations

Do we share personal data with third parties?

Sometimes we may share personal data with trusted third parties to help us deliver effective and quality services.

These recipients are either contractually bound to safeguard the data we entrust them or will sign an agreement to ensure this is the case.

Recipients that we engage with can include:

1. Parties that support us as we provide services (e.g. IT system support, providers of telecommunication systems, document production services and cloud-based software services)
2. Sub-contractors and partner organisations involved in delivering our professional services
3. Professional advisers such as lawyers and insurers
4. Recruitment service providers
5. Law enforcement and regulatory agencies

Do we transfer personal data outside the European Economic Area (EEA)?

We endeavour to store personal data on servers located in the EEA. In the event that we store personal data outside the EEA, we will always ensure that appropriate safeguards are in place to guarantee individuals' rights remain enforceable (such as the EU-US Privacy Shield).

Do we use cookies?

This website uses cookies. We use cookies to help make our website usable and to understand how visitors interact with us.

Cookies are small text files that can be used by websites to make a user's experience more efficient.

The law states that we can store cookies on your device if they are strictly necessary for the operation of this site. For all other types of cookies we need your permission.

This site uses different types of cookies. Some cookies are placed by third party services that appear on our pages. The following types of cookies may appear on our site:

- *Necessary Cookies* - Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.
- *Preferences* - Preference cookies enable a website to remember information that changes the way the website behaves or looks, like your preferred language or the region that you are in.
- *Statistics* - Statistic cookies help website owners to understand how visitors interact with websites by collecting and reporting information anonymously.
- *Marketing* - Marketing cookies are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third party advertisers.

What type of cookies are used and why?

The table below explains the cookies we use and why.

Type	Cookie Name	Provider	Purpose	Expiry
Necessary	bSession	factor-50.co.uk	Necessary for measuring and reporting of website performance	1 day
	Hs XSRF-TOKEN		Ensures visitor browsing-security by preventing cross-site request forgery. This cookie is essential for the security of the website and visitor.	When the browsing session ends
	ssr-caching		This cookie is necessary for the cache function . A cache is used by the website to optimize the response time between the visitor and the website. The cache is usually stored on the visitor's browser.	1 day
	svSession		This cookie is necessary for the login function of the website.	2 years
	TS#		Used to ensure website security and fraud detection.	When the browsing session ends
Statistics	fedops.logger.defaultOverrides		Registers statistical data on users' behaviour on the website. Used for	1 day

			internal analytics by the website operator.	
	fedops.logger.sessionId	factor-50.co.uk	Registers statistical data on users' behaviour on the website. Used for internal analytics by the website operator.	Persistent

Where cookies are used, a statement will be sent to your internet browser explaining the use of cookies. You can change or withdraw your consent at any time by changing your browser settings.

What are your data protection rights?

Your rights are outlined below. To submit a request, please email contact@factor-50.co.uk

The right of access to personal data

You have the right to access your personal data held by us.

The right of rectification

You have the right to request the correction of personal data held by us to the extent that it is inaccurate or incomplete.

The right to data portability

You have the right (in certain circumstances) to obtain personal data in a format to allow you to transfer it to another organisation.

The right to withdraw consent

You have the right to withdraw consent at any time, and the process to withdraw consent will be as easy as the process to give consent.

The right to object

You have the right to object to processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling).

This right also applies to direct marketing and processing for purposes of scientific/historical research and statistics.

The right to restrict processing

You have the right (in certain circumstances) to “block” or suppress the processing of your personal data.

The right to object to automated decision making (including profiling)

You have the right (in certain circumstances) to object to automated decisions (including profiling) based upon the processing of personal data and request human involvement.

The right to erasure/to be forgotten

You have the right (in certain circumstances) to request the deletion of personal data where there is no compelling reason for its continued processing.

We may request specific information from you to help us confirm your identity and therefore ensure your rights. This will help us guarantee that personal data is not disclosed to any person who has no right to receive it.

Personal data security

The measures we use to ensure personal data security include:

1. Putting in place policies and procedures to protect personal data from loss, misuse, alteration or destruction.
2. Making sure that access to personal data is limited only to those who need access to it and that confidentiality is maintained.
3. Applying pseudonymisation and anonymisation techniques to further protect the data.

Please be aware that the transmission of data via the Internet is not always completely secure. Whilst we will do our utmost to protect the security of your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk.

How long do we retain personal data?

We retain personal data to:

1. Provide our services
2. Stay in contact with you
3. Comply with applicable laws, regulations and professional obligations that we are subject to

Unless a different time frame applies as a result of business need or specific legal, regulatory or contractual obligations, we retain personal data for two years from the most recent engagement or processing.

We will dispose of personal data in a secure manner when we no longer require it.

Job applicants, current and former employees

Personal details you provide in your application for a job opening at Factor 50 will be used by us to process your application in accordance with the GDPR and other applicable laws.

Third parties

We may also share your data with approved organisations for fraud prevention purposes or with other third-party suppliers working on our behalf, such as employment verification service providers.

Data retention

In all instances we take steps to ensure that an adequate level of protection is given to your personal data. Any information provided will only be stored for the necessary amount of time required, after which it will be safely destroyed. By submitting your application you are agreeing to your data being processed in accordance with these terms.

Personal information about unsuccessful candidates will be held for 12 months after the recruitment exercise has been completed, it will then be destroyed or deleted. We retain de-personalised statistical information about applicants to help inform our recruitment activities, but no individuals are identifiable from that data.

Upon employment

Once a person has taken up employment with Factor 50, we will compile a file relating to their employment. The information contained in this will be kept secure and will only be used for purposes directly relevant to that person's employment. Once their employment has ended, we will retain the file in accordance with the requirements of our retention schedule and then delete or anonymise it.

Visitors to our websites

When someone visits <https://www.factor-50.co.uk/> or www.HelpMyStreet.org/:

1. We collect standard internet log information and details of visitor behaviour patterns.
2. We do this to find out things such as the number of visitors to the various parts of the sites.
3. We collect this information in a way which does not identify anyone. We do not make any attempt to find out the identities of those visiting our website.
4. We will not associate any data gathered from these sites with any personally identifying information from any source.

Links to other websites

On our websites and their subdomains, we may provide links to other websites - known as external links. This privacy notice does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

External links are selected and reviewed when the page is published. However, we are not responsible for the content of external websites we have no control over. The content on external websites can be changed without our knowledge or agreement.

Some of our external links may be to websites which also offer commercial services, such as online purchases. The inclusion of a link to an external website from our website should not be understood to be an endorsement of that website or the site's owners, their products or services.

People who email us

Any email sent to us, including any attachments, may be monitored and used by us for reasons of security and for monitoring compliance with office policy.

Email monitoring or blocking software may also be used. Please be aware that you have a responsibility to ensure that any email you send to us is within the bounds of the law.

Changes to this privacy policy

We keep our privacy notice under regular review. This privacy notice was last reviewed on 13th June 2023.

Modern Slavery and Human Trafficking

Effective date: 26th April 2022

We would like to make a simple statement about modern slavery and human trafficking:

Modern Slavery is the term used within the UK and is defined within the [Modern Slavery Act 2015](#).

The Act categorises offences of Slavery, Servitude and Forced or Compulsory Labour and Human Trafficking.

Factor 50 Ltd continues to adopt a zero tolerance to modern slavery, human trafficking, all forms of servitude and forced and compulsory labour. We fully support the government's objectives to eradicate all forms of modern slavery and human trafficking and continue to set high standards of impartiality, integrity, transparency, and objectivity.

We will ensure that our activities and those of any sub-contractors operate to the highest level of ethical standards operating under sound governance arrangements.

Changes to this modern slavery and human trafficking policy

We keep our policies under regular review. This modern slavery and human trafficking policy was last reviewed on 13th June, 2023.

Patient Privacy Policy

Effective date: June 14th 2023

Who is this document for?

This document is for all people who have been a patient or interacted with NHS services in England over the past five years. Please note, we do not use NHS patient data for HelpMyStreet.

What type of personal information we hold

We hold and process data that has been anonymised and which cannot be used to identify an individual. We also hold and process data that is pseudonymised prior to being sent to us, meaning that parts of the data that could be used to identify someone are replaced with a key. We do not hold that key and so are not able to identify anyone from the pseudonymised data that we hold.

We hold pseudonymised and anonymised extracts of health and care records received in the National Health Service in England.

You may be included in this database if you have been a patient at a GP practice or NHS hospital in England, or have interacted with social care, community care or mental health services through the NHS in England, and you have not opted out of your data being sent to NHS Digital or used in healthcare research and planning. You are able to manage your personal data choices within the NHS by [following this link](#).

How we use your personal information

We process patient data for a number of different purposes including:

1. To help healthcare organisations identify areas of opportunity in performance or efficiency and work with them to improve
2. To support NHS England joining up health and care data initiatives including [Local Health and Care Record Exemplars](#)

Under General Data Protection Regulation (GDPR) we have specified the legal bases for collecting and processing your data; this is as follows:

1. Article 6 (1) (f) – It is necessary for our legitimate interests in being able to provide tools and services that will benefit healthcare organisations.
2. Article 9 (2) (j) – It is necessary for reasons that are in the public interest in the area of public health. We provide tools and services to public healthcare organisations that help them to monitor and improve the standards and quality of care that they offer. Our processing is thus designed to benefit patients and society as a whole through facilitating better healthcare in the UK

Some of our NHS clients provide us with pseudonymised patient-level healthcare data that we use for our analyses; here we act as the data processor and our NHS client acts as the data controller who is acting in the public interest. The legal basis for processing the data here is, through the data controller, article 6(1)(e) and 9(2)(j) of GDPR, which state that it is necessary for reasons in the public interest.

How we share your personal information

Your personal data will be used only for specific client work and for research in the public interest. The data we share with our NHS clients will not be identifiable unless specifically requested to do so by the data controller.

Where we process your personal information

We endeavour to store and process the patient data we receive from NHS organisations on servers located in the EEA. In the event that we store personal data outside the EEA, we will always ensure that appropriate safeguards are in place to guarantee individuals' rights remain enforceable (such as the EU-US Privacy Shield).

How long we keep your personal information

When acting as a data processor, we keep pseudonymised data provided to us by our NHS clients for a maximum of 6 months after the end of our contract of work, otherwise data is retained in accordance with the data controller's retention policies.

Accessing your information and other rights

You have a number of rights relating to your personal information, including:

The right of access to personal data

You have the right to access your personal data held by us.

The right of rectification

You have the right to request the correction of personal data to the extent that it is inaccurate or incomplete. If any of the information we hold about you is incorrect or incomplete then this should be corrected through your healthcare provider or via NHS Digital.

The right to restrict processing

You can request that the use of your personal information is limited to storage only and that we use it for no other purpose. This applies when you contest the accuracy of the personal information that we hold, or our use of the information is unlawful, or we no longer need the information except in relation to legal claims, or you object to the use of your data and we need to verify whether or not our purpose for keeping it overrides the grounds of your objection.

The right to erasure/to be forgotten

You can request that your personal information is erased if it is no longer necessary for Factor 50 to keep it, or you no longer consent for your personal healthcare information to be used for research and planning (see below), or you object and there are no overriding grounds to keep it or if it is unlawful for us to continue to keep it.

How to object or withdraw consent

You can opt out of your confidential patient information being used for research and planning by visiting <https://www.nhs.uk/your-nhs-data-matters/>. Opting out means that your personal and health data will not be passed to us for any purpose other than to make sure you get the treatment and care you need. If we already hold your personal information for research and planning purposes and you subsequently opt out, when our systems are refreshed your information will no longer be held by us.

How to contact us

If you have any query about your personal information rights then please contact our Information Governance lead, at contact@factor-50.co.uk, or write to us at Factor 50, 4th Floor, Market Square House, St James St, Nottingham, NG1 6FG.

How to complain

If you feel that we have let you down in relation to your information rights, then please contact us using the details above.

You can also make complaints directly to the Information Commissioner's Office (ICO). The ICO is the independent authority upholding information rights for the UK. Their website is ico.org.uk and their telephone helpline number is 0303 123 1113. Our ICO registration number is ZA488135.

Changes to this privacy policy

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