



tempus
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Privacy Notice

Tempus Novo

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What is the purpose of this document?

Tempus Novo is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you whilst you use our services and after you have stopped using our services, in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (together, the "Data Protection Legislation").

It applies to all current and prospective service users.

Tempus Novo is a "controller". This means that we are responsible for deciding how we hold and use personal information about you and, because of this, we are responsible for making sure it is used in accordance with Data Protection Legislation. We are required under Data Protection Legislation to notify you of the information contained in this privacy notice.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

Data protection principles

We comply with Data Protection Legislation. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where all identifiable information has been removed such that nobody can be identified from it (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection. We will also collect information relating to criminal convictions and offences (criminal offence data).

We will collect, store, and use the following categories of personal information about you which you provide when you complete the Tempus Novo assessment form:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.

- Gender.
- Marital status and dependants.
- Next of kin and emergency contact information.
- National Insurance number.
- Whether you have a bank account (Y/N).
- Benefits information.
- Details of any debt you may have.
- Background information, including accommodation status and care history.
- Date you started using the services.
- Employment history, armed forces history and qualifications.
- Employment preferences.
- Special category information (ethnicity and health information).
- Criminal offence data (prison number, prison released from, offence details, sentence details, licence/supervision terms).
- Whether you hold a current, valid driving licence (Y/N) and details of your use of public transport.

We also receive information from you when you correspond with us and from your employer or prospective employer after you have secured employment. We also create some information ourselves. This will include:

- Employment details, including your employer and your role.
- Information about your use of our information and communications systems.
- Any information you provide to your case worker or to anyone else at Tempus Novo.

How we will use information about you

We are required by law to always have a permitted reason or justification (called a “lawful basis”) for processing your personal data. We have set out the different purposes for which we process your personal data and the relevant lawful basis on which we rely for that processing.

Lawful basis

We will rely on the following lawful bases to process your personal data:

1. Where we have your consent to carry out the processing.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
4. We may also use your personal information we need to protect your interests (or someone else's interests), which is likely to be rare.

Purposes

We need all the categories of information in the list above primarily to allow us to provide our services to you. The specific purposes for which we process your personal information are listed below.

- Making a decision about whether you are eligible to use our services.
- Assessing your suitability, qualifications and preferences for a particular job or employer.
- Providing details about you to a prospective employer to enable them to consider you for a role and invite you to interview.
- Providing assistance and support to you while you are working for your employer.
- Corresponding with you.
- Dealing with legal disputes involving you.
- Complying with health and safety obligations.
- To prevent fraud.
- To monitor your use of our information and communication systems to ensure compliance with our IT policies.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- To analyse and improve the services offered by Tempus Novo.
- To facilitate the reorganisation or sale of all or part of our business or company.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to provide our services to you, as this is needed to assess your suitability for a particular role and to connect you with a potential employer.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the lawful basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

How we use particularly special category personal information and criminal offence data

We are required by law to treat certain categories of personal data with even more care than usual. These include the "special categories" of particularly sensitive personal information and criminal offence data. We need to have further justification for collecting, storing and using this type of personal information.

When you complete our assessment form, correspond with us or attend meetings with case workers, you will be asked to provide certain special category data and criminal offence data (please see above). Where you choose to provide us with such special category and criminal offence data, our lawful justification for processing such data is your explicit written consent.

We would ask that you do not provide any more personal data to us than is requested on the assessment form or than is needed to explain your situation to your case worker, so that we can then assess your suitability for employment and connect you with a prospective employer. Please note that where you have a murder conviction, you will not be eligible for using our services and we would ask that you do not complete the rest of the assessment form.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

Data sharing

We may have to share your data with third parties, including third-party service providers and prospective employers.

From time to time we may ask third parties to carry out certain business functions for us, such as for our IT support. These third parties will process your personal data on our behalf (as our processor). We will disclose your personal data to these parties so that they can perform those functions. Before we disclose your personal data to other people, we will make sure that they have appropriate security standards in place to make sure your personal data is protected and we will enter into a written contract imposing appropriate security standards on them.

In certain circumstances, we will also disclose your personal data to third parties who will receive it as controllers of your personal data in their own right for the purposes set out above, in particular:

- with prospective employers for the purposes of considering you for a role with them and facilitating your recruitment by them;
- if we transfer, purchase, reorganise, merge or sell any part of our business or the business of a third party, and we disclose or transfer your personal data to the prospective seller, buyer or other third party involved in a business transfer, reorganisation or merger arrangement (and their advisors); and
- if we need to disclose your personal data in order to comply with a legal obligation, to enforce a contract or to protect the rights, property or safety of our employees, customers or others.

We have set out below a list of the categories of recipients with whom we are likely to share your personal data:

- prospective employers (see above);
- consultants and professional advisors including legal advisors and accountants;
- courts, court-appointed persons/entities, receivers and liquidators;
- business partners and joint ventures;
- trade associations and professional bodies;
- insurers; and
- governmental departments, statutory and regulatory bodies including the Information Commissioner's Office.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the UK. We will only make that transfer if:

- the country to which the personal data is to be transferred has been recognised by the UK government as ensuring an adequate level of protection for personal data;
- we have put in place appropriate safeguards to protect your personal data, such as an appropriate contract with the recipient which incorporates or includes the UK International Data Transfer Agreement;
- the transfer is necessary for one of the reasons specified in Data Protection Legislation, such as the performance of a contract between us and you; or
- you explicitly consent to the transfer.

If we do, you can expect a similar degree of protection in respect of your personal information.

Data security

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

Third parties processors will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from the Executive Director of Tempus Novo.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

How long will you use my information for?

We will only retain your personal information whilst you use our services and then, after you cease to be a service user, for as long as necessary in connection with both our and your legal rights and obligations. This may mean that we keep some types of personal data for longer than others.

Details of retention periods for different aspects of your personal information are available in our retention policy which is available from our Executive Director. We will only retain your personal data for a limited period of time. This will depend on a number of factors, including:

- any laws or regulations that we are required to follow;
- whether we are in a legal or other type of dispute with each other or any third party;

- the type of information that we hold about you; and
- whether we are asked by you or a regulatory authority to keep your personal data for a valid reason.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a service user, after the relevant period set out in our data retention policy, we will securely destroy your personal information in accordance with our data retention policy.

Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

Your rights in connection with personal information

Under certain circumstances and subject to relevant conditions, under Data Protection Legislation you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to ask us to correct any incomplete or inaccurate information we hold about you.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact your Caseworker in writing.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other data protection rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Executive Director. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We also encourage you to check this notice on a regular basis. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact the Executive Director of Tempus Novo on admin@tempusnovo.org