

Overview

This Privacy Policy details how Triangle Technology Ltd. uses and protects personal data in the course of our core activities. The policy also outlines the rights data subjects have regarding their data and describes how data subjects can contact the organisation to exercise these rights.

“Personal data” is any information about a living individual which allows them to be identified from that information, or that information along with other information available to the individual or organisation who controls or processes their data.

A “data subject” is taken to be any individual whose data is collected, processed or stored by the organisation.

The policy covers data processed by the following entities:

- Triangle Technology (triangletechnology.co.uk)
- The Step Platform (stepsearch.org)
- The Migrant Advice Portal (migrantadvice.org)

For the purposes of this policy, Triangle Technology Ltd is considered the “data controller” for personal data provided to any of these entities, where accessed directly by a member of the public. This means we are responsible for determining what personal data is processed and for what purpose and for securely collecting, storing and processing personal data. Triangle Technology Ltd. will be referred to as “the organisation”, “us” or “we” throughout this policy.

We also licence this software to 3rd party organisations who use the software with their staff, clients and service users. When used within these contexts, we act as the “data processor”, and the “data controller” is the 3rd party organisation who facilitates use of the software.

Triangle Technology Ltd. is committed to processing personal data responsibly, lawfully and securely in accordance with the UK Data Protection Act 2018 (“DPA 2018”) and EU Regulation 2016/679 (the General Data Protection Regulation “GDPR”).

1. Data protection

We secure personal data by:

- Using appropriate policies, processes and best practice to safely manage personal data.
- Minimising the amount of personal data collected, process or store and holding this for a minimal timeframe.
- Ensuring any third-party organisations who collect or store personal data on my behalf are GDPR-compliant and committed to data protection.
- Being responsive to any requests from data subjects who wish to exercise their rights to access, rectify, limit, or erase data held on them, or who contact the organisation with any other relevant requests related to their personal data.

- Committing to deal appropriately with any unlikely breach of data security by having a plan in place that involves implementing all necessary procedures and may include notifying relevant individuals or organisational bodies.

2. Categories of personal data

In the course of our core activities, Triangle Technology Ltd. may process personal data that includes, but is not limited to:

- names, titles and aliases;
- contact details such as address or postcode, email address and telephone number;
- support needs, demographic information, and outcomes;
- identification data including date of birth; photograph; and identity document number,
- financial information, such as bank account details;
- additional personal information for current or future employees, contractors or volunteers within the organisation, relevant to their employment or engagement with the organisation, which may also include details for next of kin.

3. Purposes of personal data

We process this data for the following purposes:

- to connect individuals requiring help with appropriate support options;
- to provide data insights and better inform the decision making of service providers, funders, commissioners and researchers;
- to inform, or engage with, relevant individuals or organisations interested in our services;
- to process payment for services we contract from other individuals or organisations;
- to process payments we receive for our services;
- to seek views or comments from individuals engaged with our organisation;
- to manage and fulfil our obligations to any volunteers, contractors or employees of the organisation;
- to meet any relevant statutory and legal obligations.

4. Principles of data protection

We ensure that personal data is processed in accordance with the eight Data Protection Principles set out by the Information Commissioner's Office.

These state that personal data must:

- be processed fairly, lawfully and transparently;
- be collected and processed only for specified, explicit purposes;
- be adequate, relevant and limited to what is necessary for the purposes for which it is processed;
- be accurate and kept up to date;
- not be kept for longer than is necessary for the purposes for which it is processed;

- be processed in line with the data subject's rights;
- be processed securely;
- not be transferred outside the EU without adequate protection.

5. Lawful bases

We only collect or process personal data when we have a lawful basis for doing so. The six lawful bases for processing personal data are:

- Consent
- Contract
- Legal obligation
- Vital interests
- Public interest
- Legitimate interests

Much of the personal data we collect is processed on the basis of consent – meaning that a client, potential volunteer, individual seeking help or services, job applicant or other individual explicitly tells us they agree that the organisation will process some of their personal data for a specific, named purpose.

We may also process personal data in order to create contracts or fulfil contractual obligations, or because we have a legal or statutory responsibility to do so. This most often applies to data processed to provide our services to organisations or individuals; to contract the services of others; to fulfil our financial obligations to HMRC and other entities; and to fulfil any employment, health and safety or safeguarding responsibilities we may have.

More rarely, we may need to process personal data based on vital interests or legitimate interests. If we process data on the lawful basis of legitimate interests, we ensure that processing this data is necessary to fulfil our core functions as an organisation, and that this processing does not overly affect the interests, rights and privacy of the person whose data we are processing.

6. Third parties

Triangle Technology Ltd. may use third-party services to collect, process and store personal data; or share personal data with trusted third-party services where necessary.

We ensure that any third-party service we work with is GDPR-compliant and committed to data protection. Each third-party service provider's use of personal data is dictated by their respective privacy policy.

We currently use the following sub-processors:

Amazon Web Services, 410 Terry Avenue North, Seattle, WA 98109-5210

Privacy policy

<https://aws.amazon.com/privacy/>

Digital Ocean, 101 6th Ave New York, NY 10013
<https://www.digitalocean.com/legal/privacy-policy>

PHD Mail, Unit 1-2 Falcon Close, Burton-on-Trent, Staffordshire, DE14 1SG
<https://www.phd-uk.com/privacy-policy/>

Bulk SMS Ltd, 20 Wollaton Street, Nottingham, England, NG1 5FW
<https://www.voodoosms.com/help/security-privacy-terms/privacy-policy>

7. Our use of cookies

Triangle Technology is committed to safe and lawful use of cookies. Cookies are small data files which are placed on your device while you browse the internet which remember your device. Data collected via cookies may include pages viewed and details about your browser or device, but it does not include personal data such as your name or contact details.

Our websites use a very limited number of cookies. These include only strictly necessary cookies (those required for you to experience the full functionality of the sites), and include no personal data nor history of browser activities. As these cookies are required for the site to function, and so they do not operate on a consent basis. On this basis, there are no facilities to opt out of these cookies.

8. Data retention policy

User data is retained for a period of 6 months, at which point any personal data will be deleted or anonymized as appropriate.

9. The rights of data subjects

Triangle Technology Ltd. will always respect the rights of data subjects regarding personal data collected, processed or stored. Data subjects have different rights depending on the lawful basis under which we process the data.

Right to access

Data subjects have the right to ask for a copy of the information held about them (including why we hold the information, who has access to it, and where we obtained it), which is called a "subject access request".

Right to erasure

Unless we hold data due to legal obligation or on the basis of public interests, data subjects have the right to request that we delete or stop processing their data.

Right to rectification

Data subjects have the right to ask us to change incorrect or incomplete information we hold about them.

Right to restriction of processing

Data subjects have the right to ask us to restrict the way we process their personal data.

Right to object

Data subjects have the right to object to our use of their personal data, which effectively asks us to stop processing your information. Data subjects can't object to data that is held or processed on the basis of contract, legal obligation or vital interests. While data subjects can't formally object to data held or processed on the basis of consent, they can withdraw consent at any time.

Right to portability

Data subjects have the right to ask us to receive a copy of all personal data we hold on them, and to ask us to send it in a structured, easily accessible, machine readable format, or to ask for this data to be sent directly to another data controller.

Right to lodge a complaint

If you have a complaint that you do not believe we have dealt with appropriately, you have a right to lodge a complaint with the ICO, who are the supervisory body for data protection issues in the UK. You can contact them here: <https://ico.org.uk/global/contact-us>

10. Contacting us

Data subjects can make a subject access request or exercise any other rights regarding their personal data by getting in touch via our contact form.

As recommended by the ICO, we will process any such request within 30 days, unless we consider the request manifestly unfounded or excessive, in which case we will write to you explaining the situation and the next course of action within the 30-day limit.

11. Breaches of data security

A personal data breach means that the security of personal data is compromised. This includes accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data.

In the unlikely event that a data breach occurs, Triangle Technology Ltd. will follow GDPR-compliant protocol by implementing a recovery plan, notifying the appropriate authorities and informing any relevant people or organisations.

This Privacy Policy was last updated on 05/07/2022 and will be reviewed on an annual basis to ensure it accurately represents the organisation's current use of personal data.