

Privacy Notice for Customers

Triangle Consulting Social Enterprise Ltd

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If you have any questions about this Privacy Notice, please contact us:

- info@triangleconsulting.co.uk
- +44 (0)207 272 8765
- The Dock Hub, Wilbury Villas, Hove, BN3 6AH, UK.

You can find a Privacy Notice for People Being Supported (data subjects) here:

www.outcomesstar.org.uk/privacy-policy

1 Introduction

In operating our business Triangle Consulting Social Enterprise Ltd (“Triangle”) holds certain types of information about our client organisations, their personnel and the people they support. Triangle respect the privacy of all personal information, and ensure it is treated fairly, lawfully, correctly, and confidentially.

This notice is designed for client organisations and their personnel. It describes the information we collect and how we use it and applies to organisations before, during and after they have an agreement to use our products and/or services.

For a Privacy Notice aimed at people being supported whose data is captured using the Outcomes Star and stored within the Outcomes Star Online, see <https://www.outcomesstar.org.uk/privacy-policy/>.

2 Our overall commitment to data privacy

We acknowledge our accountability in ensuring that personal data shall be:

- Processed lawfully, fairly and in a transparent manner;
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (‘data minimisation’);
- Accurate and kept up to date;
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed (‘storage limitation’);
- Processed in a manner that ensures appropriate security of the personal data.

In all processing of personal data, we use the least amount of identifiable data necessary to complete the work it is required for, and we only keep the information for as long as it is required for the purposes of processing or any other legal requirement to retain it.

Where possible, we will use pseudonymised data to protect the privacy and confidentiality of our staff and those we support.

For more information about our overall approach to Information Governance, see our Information Governance statements (available for UK/Europe and Australia.)

3 Overview of information processed by Triangle

Triangle processes information belonging to 5 audiences:

Audience		Description
A.	Customer information	Personnel from client organisations involved in the purchase of products and services from Triangle
B.	Licensed Trainer information	Personnel from client organisations who have completed Licensed Trainer training from Triangle and who have a Licensed Trainer licence
C.	Account Lead information	Personnel from client organisations who have administrator permissions within Outcomes Star Online
D.	Practitioner information	Personnel from client organisations who have practitioner or service manager permissions within Outcomes Star Online and who may have completed training from Triangle
E.	Service user information	People being supported by the client organisation, whose data is collected by the client organisation using the Outcomes Star and processed by the Outcomes Star Online (optional)

This notice explains how, setting out for each audience:

- The information we hold, how we use it and if we share it with anyone
- Your rights and responsibilities
- Where we hold your information and how long we keep it

4 A) Customer information

4.1. The information we hold

Organisation and service names, address, registration details, contact details, bank and relevant tax details, finance portal URLs and instructions, PO numbers.

For personnel involved with the purchase of products and services – names, job titles, email addresses, telephone numbers.

Information about the products and services purchased by the client organisation.

Non-personal data relating to use of products and services, eg last log in to Outcomes Star Online.

4.2. How we use this information

Triangle will contact personnel in this category to fulfil the terms of our contract with the client organisation, such as arranging training, ensuring payment of invoices or informing of any changes to the product or services affecting the client organisation.

Triangle will contact personnel in this category to share updates on products and services through our quarterly newsletter, which will have a clearly worded option to unsubscribe from future newsletters.

Where Triangle wishes to hold and use data for marketing, Triangle will seek their active consent and the clearly worded option to unsubscribe from future marketing communications.

4.3. How this information is shared

We will never pass on your personal information to third parties for marketing purposes.

We share this information internally with our staff via our internal IT systems which comply with security requirements. We also share it with our network of associates and, if you are outside the United Kingdom, with our international service providers, who deliver training and support on our behalf. Our external finance and accounting contractors have access to the information to the extent required. Where external organisations or contractors are involved we ensure that these meet the same standards to protect your information as we do.

If we want to share your information with any third parties, we will always ask you to obtain your express consent. This could be the case if we feel it could be helpful to put you in touch with someone else who is or might be using the Outcomes Star.

4.4. Your rights and responsibilities

You have a right to access the personal information we hold about you and to request that we send it to you in a common format. You also have the right to request that incorrect information be corrected, or that inaccurate or irrelevant information be removed.

If you would like to make use of these rights, please contact us (details on page 1.)

As the personnel responsible for purchasing Outcomes Stars for the client organisation, you have responsibility for ensuring that the Outcomes Star is appropriate for use as a data collection tool by your organisation. This includes ensuring that the data collected by the Star is appropriate for the remit of your service, that the holistic nature of the Star is understood and appropriate for the services using it and that usage of the Outcomes Star complies with the policies and legislation applicable to your organisation.

You may need to support the Account Lead (see section 5 – C) Account Lead)) in ensuring that there is an appropriate legal basis on which data is collected by your organisation using the Outcomes Star, including defining if and how you need to obtain and record consent from service users/data subjects. If your organisation does not already have a process for this, Outcomes Star Online provides forms and functionality to support you in meeting your obligations around consent.

4.5. How long we keep the information for

We hold different types of data for varying lengths of time in accordance with the Code of Practice published by the Office of the Information Commissioner (UK):

Type of Record	Maximum Duration
Details of potential customers	5 years after last contact
Details of inactive customers	12 years after closure of account
Contracts and agreements	12 years after termination of the contract
Accounting & tax-relevant information, such as payments, bank statements, ledgers, receipts, and invoices	7 years

4.6. Where we keep the information

- Client relationship system: Salesforce
- File-sharing system: Microsoft 365
- Email provider: Microsoft 365
- Finance/Accounting software: Xero
- For newsletters, provided you have not unsubscribed: Mailchimp
- For marketing emails, provided we have your consent: Mailchimp

5 B) Licensed Trainer Information

5.1. The information we hold

For active Licensed Trainers:

Names, job titles, email addresses, telephone numbers, organisation and service names and addresses, information about previous training experience and qualifications, a Unique Reference Number assigned by Triangle.

Information about the products and services purchased by the organisation employing the Licensed Trainer.

Non-personal data relating to use of products and services, eg last log in to Outcomes Star Online.

For inactive Licensed Trainers:

We retain basic information about that person (name, job title, organisation and service names, dates of training and certification.)

5.2. How we use this information

Triangle will contact personnel in this category to fulfil the terms of our contract with the client organisation, such as to inform of new resources or invite to Continuing Professional Development (CPD) session.

Where Triangle wishes to hold and use data for marketing, Triangle will seek their active consent and the clearly worded option to unsubscribe from future marketing communications.

Information about inactive Licensed Trainers is retained to facilitate future support to those individuals, who often become Licensed Trainers under future employers or other services.

5.3. How this information is shared

We will never pass on your personal information to third parties for marketing purposes.

We share this information internally with our staff via our internal IT systems which comply with security requirements. We also share it with our network of associates and, if you are outside the United Kingdom, with our international service providers, who deliver training and support on our behalf.

Licensed Trainers consent to their email address being shared with other Licensed Trainers within the Licensed Trainer community when they register to become a Licensed Trainer.

If we want to share your information with any third parties outside of the Licensed Trainer community, we will always ask you to obtain your express consent. This could be the case if we feel it could be helpful to put you in touch with someone else who is or might be using the Outcomes Star.

5.4. Your rights and responsibilities

You have a right to access the personal information we hold about you and to request that we send it to you in a common format. You also have the right to request that incorrect information be corrected, or that inaccurate or irrelevant information be removed.

If you would like to make use of these rights, please contact us (details on page 1.)

Licensed Trainers have a particular set of responsibilities in relation to Outcomes Star intellectual property / copyright and best practice. For more information, see Licensed Trainer information on our website.

5.5. How long we keep the information for

Type of Record	Maximum Duration
Contracts and agreements	12 years after termination of the contract
Basic information about inactive Licensed Trainers	Indefinitely

5.6. Where we hold the information

- Client relationship system: Salesforce
- File-sharing system: Microsoft 365
- Email provider: Microsoft 365
- For newsletters, provided you have not unsubscribed: Mailchimp
- For marketing emails, provided we have your consent: Mailchimp
- Outcomes Star Online login – servers hosted in the UK, data encrypted at transit and rest.

6 C) Account Lead information

The Account lead is the Outcomes Star Online account administrator and the primary contact for Triangle in delivering the software service the client organisation has contracted us to provide.

A standard account will only have 1 person as the Account Lead. From January 2024, client organisations can purchase an optional Assistant Account Lead feature, enabling an unlimited number of users to also have Account Lead permissions. Any user with Assistant Account Lead permissions will come under this audience of the Privacy Notice.

6.1. The information we hold

First name, surname, email address – these are collected during the initial purchase of the product via the Quote Confirmation form (Salesforce.)

Once registered, password (encrypted), IP address and audit event logs (only available through audit logs via authorised user), name of services set up within the account and information about those services (settings, Star versions in use, name, type.)

6.2. How we use this information

Triangle will contact personnel in this category to fulfil the terms of our contract with the client organisation, such as responding to Helpdesk tickets or information about upcoming changes to the account.

Name, email address and a limited set of audit events (date of first login, date of most recent login) are synced from Outcomes Star Online to Salesforce.

In-app notifications and alerts are used to notify users of planned downtime and to communicate important messages, for instance, about upcoming changes to the system. Users can dismiss these once read.

Triangle will contact personnel in this category to share updates on products and services through our quarterly newsletter, which will have a clearly worded option to unsubscribe from future newsletters.

6.3. How this information is shared

We will never pass on your personal information to third parties for marketing purposes.

We share this information internally with our staff via our internal IT systems which comply with security requirements.

If we want to share your information with any third parties, we will always ask you to obtain your express consent. This could be the case if we feel it could be helpful to put you in touch with someone else who is or might be using the Outcomes Star.

6.4. Your rights and responsibilities

You have a right to access the personal information we hold about you and to request that we send it to you in a common format. You also have the right to request that incorrect information be corrected, or that inaccurate or irrelevant information be removed. If you would like to make use of these rights, please contact us (details on page 1.)

Users signing up for Account Lead logins sign up to the terms and conditions of Triangle's Licenses, Training and Services agreement.

As the account administrator, the Account lead user is responsible for and has access to all data contained within the organisation's account. This includes all service user data entered by practitioners. The Account Lead is responsible for managing user permissions and ensuring authorised access to data.

The Account Lead and their organisation are responsible for ensuring that data collected by the organisation and processed within Outcomes Star Online is done so under an appropriate legal basis, which may or may not be consent from the data subject, depending on the service. Triangle provide guidance, documentation and forms for Account Leads and organisations to support them in the fulfilment of these responsibilities.

6.5. How long we keep the information for

Type of Record	Maximum Duration
Basic details of inactive customers – name of Account Lead	12 years after closure of account
Other Account Lead information	Permanently deleted 3 months after closure account
Helpdesk Tickets	2 years from closure of ticket

6.6. Where we hold the information

- Client relationship system: Salesforce
- Helpdesk ticket system: Deskpro
- Email provider: Microsoft 365
- For newsletters, provided you have not unsubscribed: Mailchimp
- Outcomes Star Online login – servers hosted in the UK, data encrypted at transit and rest.

7 D) Practitioner information

7.1. The information we hold

Outcomes Star Online holds first name, surname, email address – these are entered by the Account Lead when the practitioner is set up with a login. Once registered, password (encrypted), IP address and audit event logs (only available through audit logs via authorised user), name of services set up within the account and information about those services (settings, Star versions in use, name, type.)

Salesforce holds contact details about practitioners who are booked in for Outcomes Stars training.

7.2. How we use this information

Triangle will contact personnel in this category only fulfil the terms of our contract with the client organisation, such as responding to Helpdesk tickets, sharing information about any significant upcoming changes, or delivering materials for training courses.

In-app notifications and alerts are used to notify users of planned downtime and to communicate important messages, for instance, about upcoming changes to the system. Users can dismiss these once read.

We will never use this information for marketing purposes.

7.3. How this information is shared

We will never pass on your personal information to third parties for marketing purposes.

Data stored in Outcomes Star Online is only shared with privileged users - ie the team providing the Helpdesk service, and the developers behind the software, QES Ltd. Privileged users are subject to strict access controls and security procedures.

Data about training participants is stored in Salesforce and is only shared with Triangle employees involved in delivering training to your organisation.

7.4. Your rights and responsibilities

You have a right to access the personal information we hold about you and to request that we send it to you in a common format. You also have the right to request that incorrect information be corrected, or that inaccurate or irrelevant information be removed.

If you would like to make use of these rights, please contact us (details on page 1.)

Users signing up for practitioner logins sign up to the terms and conditions of Triangle's Licenses, Training and Services agreement, including:

- Each login to be used by 1 user only and use a unique email address
- Each user to have completed Core Outcomes Star Training

7.5. How long we keep the information for

Type of Record	Maximum Duration
Training participant information	12 years after closure of the account
Practitioner information on OS Online	Permanently deleted or fully anonymised 3 months after closure account
Helpdesk Tickets	2 years from closure of ticket

7.6. Where we hold the information

- Outcomes Star Online login – servers hosted in the UK, data encrypted at transit and rest.
- Client relationship system: Salesforce
- Helpdesk ticket system: Deskpro

8 E) Service User information

8.1. The information we hold

We treat all data entered by practitioners into the Outcomes Star Online as sensitive, personal data. A full list of fields available within the Outcomes Star is available within our Information Governance Statements, available on request.

Data can include:

- Names, ID numbers, contact details, date of birth, gender identity and ethnicity.
- Support needs, such as ex-offender or health conditions.
- Data relating to Stars and action plans, including free-text notes.

8.2. How we use this information

We will never use this information to contact service users directly. This information is solely used to facilitate our contract obligations to client organisations and to facilitate them using the Outcomes Stars in their services.

8.3. How this information is shared

We will never pass on personal information to third parties for marketing purposes. This information is strictly shared only with privileged users of the Outcomes Star Online – the team providing the Helpdesk service, and the developers behind the software, QES Ltd. Privileged users are subject to strict access controls and security procedures.

8.4. Your rights and responsibilities

Data subjects have a right to access the personal information we hold about them and to request that we send it to them in a common format. They also have the right to request that incorrect information be corrected, or that inaccurate or irrelevant information be removed.

If they would like to make use of these rights, they should contact us. We will work with the Account Lead in line with our procedures to fulfil the request.

8.5. How long we keep the information for

Permanently deleted or fully anonymised 3 months after closure account.

8.6. Where we hold the information

Outcomes Star Online – servers hosted in the UK, data encrypted at transit and rest.