

Privacy notice 34: Financial transactions and adjustments

Date completed 07/07/2023

This notice is one of a set which explain what data we collect, store and process to provide our services to customers. It also sets out the legal basis we are using for collecting the data stated.

- Privacy notice 02: Employees and volunteers
- Privacy notice 05: Medical records
- Privacy notice 07: Former KFRS employees
- Privacy notice 11: Pensions
- Privacy notice 12: Insurance
- The overall privacy notice
- The breach process contained in Annex 1 of the Data Protection and Information Security Policy which sets out what we will do should any data we collect be lost or misused. This can be found here: <https://www.kent.fire-uk.org/freedom-information-foi>

Our contact details

Kent Fire and Rescue Service
The Godlands
Straw Mill Hill
Tovil
Maidstone
ME15 6XB

Email: data.protection@kent.fire-uk.org

Telephone: 01622 692121

Why we collect and use personal data

This notice covers the collection, processing and sharing of personal data held by KFRS for the purposes of reducing the risk of fraud, money laundering, bribery, or other forms of corruption, recovering outstanding debts, and supporting the investigation of suspected offences.

We have a legal obligation to do this under the following legislation: [the Local Government Finance Act 1992](#); [the Proceeds of Crime Act 2002](#); [the Serious Organised Crime and Police Act 2005](#); [the Terrorism Act 2000](#); [the Anti-Terrorism, Crime and Security Act 2001](#); and [the Money Laundering, Terrorist Financing and Transfer of Funds Regulations 2017](#).

In practical terms, this will relate to data that is processed and shared as part of the National Fraud Initiative's national data matching exercise.

It also includes the data that we need to share as part of our creditor and debtor transaction reporting.

We also need the ability to pass outstanding debts to debt recovery agencies in order to seek recovery and reclaim any money we are owed.

The information that we process and share may relate to employees, volunteers, contractors, or suppliers.

The types of personal data we collect and process

As part of our fraud reduction and debt recovery procedures we may collect, process and share the following types of personal data:

- Name
- Date of birth
- Contact details such as addresses, telephone numbers and email addresses
- Payroll reference numbers
- Salary records
- Bank details and national insurance number
- Contract details (for contractors or suppliers)

Our lawful reasons for collecting and processing personal data

The six lawful bases for processing personal data are set out in [Article 6\(1\) of the UK GDPR](#). These are as follows:

(a) Consent: the individual has given clear consent for you to process their personal data for a specific purpose.

(b) Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.

(c) Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).

(d) Vital interests: the processing is necessary to protect someone's life.

(e) Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.

(f) Legitimate interests: the processing is necessary for your legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. NB: This cannot apply if you are a public authority processing data to perform your official tasks.

As part of our fraud reduction and debt recovery procedures we may collect, process and share personal data. When we do so we will rely on the following lawful bases:

- **Contract** as set out in [Article 6\(1\)\(b\) of the UK GDPR](#). As part of ensuring that our employees, volunteers, contractors, or suppliers meet their contractual obligations, when we are faced with outstanding debts, we may share data with debt recovery agencies in order to seek recovery and reclaim any money we are owed.

- **Compliance with a legal obligation** as set out as set out in [Article 6\(1\)\(c\) of the UK GDPR](#), we will rely on this to meet our legal obligations to reduce the risk of fraud, money laundering, bribery, or other forms of corruption, recover outstanding debts, and support the investigation of suspected offences.

Compliance with a legal obligation requires a separate basis in law. This comes from the following:

- Our compliance with the requirements of the following legislation: [the Local Government Finance Act 1992](#); [the Proceeds of Crime Act 2002](#); [the Serious Organised Crime and Police Act 2005](#); [the Terrorism Act 2000](#); [the Anti-Terrorism, Crime and Security Act 2001](#); and [the Money Laundering, Terrorist Financing and Transfer of Funds Regulations 2017](#).

Special category data

[Article 9 of the UK GDPR](#) covers special category data. Special category data is personal data that needs more protection because it is sensitive. The nine types of special category data are as follows:

- personal data revealing racial or ethnic origin;
- personal data revealing political opinions;
- personal data revealing religious or philosophical beliefs;
- personal data revealing trade union membership;
- genetic data;
- biometric data (where used for identification purposes);
- data concerning health;
- data concerning a person's sex life
- data concerning a person's sexual orientation

However, none of the data listed above would be collected as part of this processing, meaning the additional responsibilities necessitated when processing Article 9 special category data are not applicable to this context.

Who might we share your data with?

To reduce the risk of fraud, money laundering, bribery, or other forms of corruption, recover outstanding debts, and support the investigation of suspected offences we may share data with the following organisations:

- The National Crime Agency
- The Public Sector Fraud Authority
- HM Revenue and Customs
- The police
- Debt recovery agencies

Where is the data stored?

Data is stored within the Authority's document management system, which is hosted on a cloud-based server system. Access to the data is restricted to those that require it for their role.

Other data (including payroll) is held in iTrent, which is KFRS' payroll system and electronic employee portal, and is hosted on a cloud-based server system provided by our supplier MHR. Their privacy notice can be found here:

<https://mhrglobal.com/uk/en/privacy-policy>

How long will we hold your data for?

Personal data collected from to employees, volunteers, contractors, or suppliers. will be held in accordance with the periods set out in sections our KFRS' Publication and Retention Scheme (<https://www.kent.fire-uk.org/freedom-information-foi>)

What are my data protection rights?

Under data protection law, you have the following rights:

Your right of access

You have the right to ask us for copies of your personal information. You can ask to see it by making a subject access request. Guidance for making a request is available here: <https://www.kent.fire-uk.org/freedom-information-foi>

Your right to rectification

You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure

You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing

You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing

You have the the right to object to the processing of your personal information in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

If you wish to make a request, please contact us at:

Email: data.protection@kent.fire-uk.org

Telephone: 01622 692121

Address:

Kent Fire and Rescue Service
The Godlands
Straw Mill Hill
Tovil
Maidstone
ME15 6XB

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us using the contact information above.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>