

SAS Mutual CIC



Privacy Notice

About us

SAS Mutual CIC is a special form of non-charitable limited company, which exists primarily to benefit the education community, rather than to make a profit for shareholders. It is known as a Community Interest Company (CIC), registration number 12499719.

We manage a discretionary mutual staff absence and wellbeing fund for the benefit of schools, nurseries, colleges and academies throughout the UK. Our ICO license number is ZA757213.

SAS Mutual CIC is committed to ensuring the personal data of our members and their staff are protected. This Privacy Notice provides details of the information that we may process to assist with the administration and management of your membership and associated services.

The Members' provide SAS Mutual CIC with personal data related to employed staff for payments in relation to absenteeism and wellbeing support services under the scheme. SAS Mutual CIC is acting as the Member's third-party processor in respect of this data.

This notice applies to:

- Members of the Mutual or prospective mutual members.
- The staff, and other authorised stakeholders of the Member.

This notice applies to data collected:

- Via our website
- Via the online portal
- Over the phone
- Via email or other written communication, including social media
- Via our App

Data Protection Principles

Personal Data must be processed following the six Data Protection Principles.

It must be:

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

- Kept securely.

This Privacy Notice sets out how SAS Mutual CIC complies with these data processing principles.

Where we might collect personal data from

Depending on the information required, we may collect personal data from various sources, including:

- The Member or potential Member.
- You (the data subject) as one of our member's stakeholders.
- A Doctor, GP or other medical professionals in the event of a claim. In such circumstances, explicit consent will be sought from the data subject.

We may, from time to time, receive information about you from the third parties we work with. This, for example, could be from a business partner, third-party processor or payment service provider.

Categories of personal data we collect

We collect different categories of personal data depending on your relationship with us:

A Potential Member

If you are considering membership of the Mutual we may collect:

- Details of the decision-makers within the organisation including name, position, email address and telephone number.
- Marketing preferences and customer satisfaction surveys.
- Phone calls which may be recorded for training or monitoring purposes.

A Member

If you are a member of the Mutual or in the process of renewing membership, we may collect:

- Contact details of staff responsible for decision making in the school, including name, position email address and phone number.
- Details of the staff member(s) authorised to administer the claims process including name, position, contact details and log-in details for the fund management portal where applicable.
- Details of the Member's staff and other authorised stakeholders protected by the Mutual fund including name, date of birth, gender, position, marital status and job description, working hours and medical history including details of pre-existing medical/health conditions
- Claim details which may including special category data such as health/medical information, and previous absence records
- Phone calls which may be recorded for training or monitoring purposes
- Marketing preferences and Member satisfaction surveys

How we use personal data

We use personal data to:

- Provide quotations on request
- Set up your account
- Manage your Mutual membership
- Evaluate absences to be covered

- Process claims
- Deliver wellbeing services
- Comply with our legal obligations
- Prevent and detect financial crime and fraud
- Assess risk
- Analyse the performance of our service
- Send marketing, promotional or customer service communications relating to SAS Mutual CIC

Lawful Bases for Processing

Whenever personal data is shared with and processed by SAS Mutual CIC, the Member as the Data Controller must have a lawful basis for processing and sharing of that personal data. Please see your organisation's Privacy Notice for further information.

Processing in respect of that shared data by SAS Mutual CIC and its fund administrator - Schools Advisory Service (SAS), is undertaken on the following lawful bases:

- Pursuant to a contract, or to take steps to enter into a contract in respect of membership of the Mutual fund and the services provided therein.
- To comply with a legal obligation
- The data subject has freely given clear consent

Special category data is processed under the following lawful bases:

- The data subject has given their explicit consent
- To establish, exercise or defend legal claims

Data Storage and Retention

All data is kept on encrypted servers and encrypted back-up servers in the UK.

SAS Mutual CIC will only keep personal information for as long as reasonably necessary to fulfil the relevant purposes for which the data was originally obtained. This will generally be for as long as:

- the organisation's membership of the Mutual is in force
- as necessary to comply with any legal and/or regulatory obligations, and
- as governed by the Limitation Act (1980)

SAS Mutual CIC typically keep personal data for up to 7 years following:

- the completion of a payment
- the termination of your Mutual membership.

Occasionally, such as if there is a dispute or legal action, we may be required to keep personal information until the issue is resolved.

Who do we share personal data with?

In order to manage and administer the fund, we need to share personal data with third-party processors.

These may include:

- SAS – the fund administrator

Wellbeing Services

Personal data may also be shared with third-party service providers who deliver specific Medical and Wellbeing services or activities to members' staff.

In all instances SAS Mutual CIC will:

- Establish a data-sharing agreement with the supplier or contractor, either in the contract or as a standalone agreement, to ensure the fair and lawful processing of personal data in accordance with your policies, our policies and Data Protection legislation.
- Only share data to the extent that the sub-processor or service provider needs it to deliver their service, and to keep them safe while working with you and us

Others

We may also share the contact details of your organisation with other companies in the SAS family group if we believe their services would be of interest and benefit to you.

We use Third Parties' to send marketing materials. We may share the name and contact email addresses of members, former members, and prospective member organisations with those Third Party Organisations to assist us in carrying out this processing activity.

Data Security

SAS Mutual CIC 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, access to your personal information is limited to those employees, consultants, service providers 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.

We have 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 and in accordance with our Data Security Policy and Breach Procedure.

Your Data Subject Rights

Individuals have the right to:

- Make a Subject Access Request (SAR) (see below)
- Withdraw consent to data processing at any time where consent is the sole lawful basis for the processing of that data.

- The rectification, erasure or restriction of processing of personal data, or object to the processing of it (in certain circumstances)
- Prevent the use of personal data for direct marketing
- Challenge processing which has been justified on the basis of legitimate interests
- Request a copy of agreements under which personal data is transferred outside of the European Economic Area, if relevant
- Object to decisions based solely on automated decision making or profiling. SAS Mutual CIC does not use automated decision making and/or profiling in any of its processes and procedures
- Prevent processing that is likely to cause damage or distress
- Be notified of a data breach in certain circumstances
- Make a complaint to the ICO
- Ask for personal data to be transferred to a third-party in a structured, commonly used and machine-readable format (in certain circumstances).

Your Duty to Inform us of Changes

The personal information we hold in relation to your organisation and its staff must be accurate and current. Please keep us informed of any changes during the term of your membership.

Subject Access Requests (SAR) and other Data Subject Rights Requests

Under data protection legislation, as a third-party processor, the data we hold about your organisation and its staff belongs to you – the Member.

Where a SAR or any other data subject rights' request is received relating to personal data provided to us by the Member (Data Controller), and where SAS Mutual CIC is acting as the Data Processor, the request will be forwarded to the Member without response.

SAS Mutual CIC shall assist the Data Controller in the fulfilment of their obligation to respond to any data subject rights request if the response requires our assistance and the provision of information and documentation.

If you wish to make a subject access request or any other data subject right request in respect of data processed by SAS Mutual CIC, please contact your organisation directly.

Contacts

Data Processor: SAS Mutual CIC Trigg House, Maisies Way, South Normanton. DE55 2DS

If you have any questions or concerns about how we process personal data, or you wish to exercise any data protection rights, please email your query to dpo@uk-sas.co.uk

Or, write to:

Data Protection Officer, Trigg House, 11 Maisies Way, South Normanton, Derbyshire, DE55 2DS.

If you have concerns that we are not able to resolve to your satisfaction you can register a concern with the UK's data protection regulator, the Information Commissioner's Office by following this link <https://ico.org.uk/make-a-complaint/>

Or, write to:

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

Tel: 0303 123 1113

Monitoring & Review

This Privacy Notice will be reviewed every year or as necessary in response to changes in Data Protection legislation.

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.