

Microsoft 365 Fair Processing Notice

About us

Bolton NHS Foundation Trust is a data controller in terms of Article 4 of the [UK General Data Protection Regulation](#). Microsoft 365 services are provided by Microsoft Corporation but administered by IT Services. This is a hosted service. Microsoft Corporation act as a data processor.

Personal data such as your name and username will be transmitted to Microsoft and held offsite on behalf of IT Services in order to create an account and provide you with the services. This is a requirement of your employment. Personal data from any non-work use you make of the services will be subject to the same conditions. In this respect, Microsoft is acting as a data processor for which Bolton NHS FT has a written agreement with it.

This data may only be used for the purpose of providing the Microsoft 365 services; Microsoft acquires no rights over it and your email or documents held by Microsoft are not scanned for advertising purposes. For more details, please see [Microsoft's Office 365 Privacy Statement](#).

As with other systems, data will also be available to certain members of IT Services to allow them to administer your account. They will only access your account with your permission or in line with our current guidelines. Please find our [Privacy Notice for staff on how we use and protect your personal information](#).

Other data about your use of the services may be held in logs which contain information of dates and times of login attempts. These help to identify and resolve problems as well as for anonymised statistical analysis. Logs are retained for a maximum of twelve months. When you leave, your account will be closed and the information retained for 90 days before is deleted and moved to an archive for 12 months retention period.

Microsoft Corporation and Bolton NHS FT comply with all applicable data protection legislations.

For further information, including on your rights, please contact the Data Protection Officer or IG Department.

What types of personal data do we handle?

If you are employed by Bolton NHS Foundation Trust, your personal details will be entered into the Microsoft 365 portal to register an account on your behalf. Your contact details, submitted as part of the registration process, will be used for populating the Active Directory.

As part of the working relation you have with the Trust, we collect the following information about you:

Information	What it is used for
Managers Name	Account setup
Full Name	Account setup
Job Tittle	Account setup
Department	Account setup
Location	Account setup
Directorate/Division	Account setup
Employment Start Date	Account setup
Previous Job Roles Details	
Job Role	Account setup
Department	Account setup
Location	Account setup
Directorate/Division	Account setup
Telephone	Account setup
Employment Start Date	Account setup
Other Data	
Personal Mobile Number	* Account setup * Personal mobile phone as data authentication prior to account provision and as self-service password reset and unlock multi-factor authentication.
Personal Email Adress	*Account setup *Personal email address as data authentication prior to account provision and as self-service password reset and unlock multi-factor authentication.
Microsoft Authenticator App , you can get more about the type of information the app collect from here .	The app provide you support to login into M365 services via your mobile device.

Our staff are trained to handle your information correctly and protect your confidentiality and privacy. We aim to maintain high standards, adopt best practice for our record keeping and regularly check and report on how we are doing. Your information is never collected or sold for direct marketing purposes.

Your information is not processed overseas

What is the purpose of processing data?

We have a legal basis to process this as part of your contract of employment (either permanent or temporary) following data protection and employment legislation.

- Staff administration and management of Microsft 365 for users to have access to the applications.
- Business management and planning
- Education or training for staff

Sharing your information

There are a number of reasons why we share information. This can be due to:

- Our obligations to comply with legislation
- Our duty to comply any Court Orders which may be imposed

Any disclosures of personal data are always made on case-by-case basis, using the minimum personal data necessary for the specific purpose and circumstances and with the appropriate security controls in place. Information is only shared with those agencies and bodies who have a "need to know" or where you have consented to the disclosure of your personal data to such persons.

Use of Third Party Companies

To enable effective IT accounts administration Bolton NHS Foundation Trust may share your information with other system providers to process the data in our behalf in order to comply with our obligations as an employer.

For example our Active Directory interface with the following systems: Imprivata, Registration Authority (CIS services), DUO for multi factor authentication, Airwatch to manage mobile devices, and ServiceNow to record calls within the IT Service Desk

The information which you provide during the course of your employment (including the recruitment process) will be shared with the NHS Business Services Authority for maintaining your employment records, held on the national NHS Electronic Staff Record (ESR) system.

Prevention and Detection of Crime and Fraud

We may use the information we hold about you to detect and prevent crime or fraud. We may also share this information with other bodies that inspect and manage public funds.

We will not routinely disclose any information about you without your express permission. However, there are circumstances where we must or can share information about you owing to a legal/statutory obligation.

Individuals Rights

Data Protection laws give individuals rights in respect of the personal information that we hold about you. These are:

1. To be informed why, where and how we use your information.
2. To ask for access to your information.
3. To ask for your information to be corrected if it is inaccurate or incomplete.
4. To ask for your information to be deleted or removed where there is no need for us to continue processing it.
5. To ask us to restrict the use of your information.
6. To ask us to copy or transfer your information from one IT system to another in a safe and secure way, without impacting the quality of the information.
7. To ask us to copy or transfer your information from one IT system to another in a safe and secure way, without impacting the quality of the information.
8. To ask us to copy or transfer your information from one IT system to another in a safe and secure way, without impacting the quality of the information.

- 9. To object to how your information is used.
- 10. To challenge any decisions made without human intervention (automated decision making)

Data Protection Officer

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Role:	Data Protection Officer
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