

## **Privacy Notice – National Security Vetting**

### **1. Data Controller**

#### **1.1. The Data Controller is:**

Public Prosecution Service, 93 Chichester Street, Belfast BT1 3JR

The Data Protection Officer for PPS can also be contacted by email ([dpo@ppsni.gov.uk](mailto:dpo@ppsni.gov.uk)) or telephone (028 9089 7100).

### **2. Why are you processing my personal information?**

- 2.1. We are processing your data for the purpose of carrying out National Security Vetting. The legal basis for this processing is that it is carried out in the public interest to protect PPS Staff and information from possible threat and to ensure that the PPS meets its obligations under the GDPR to provide “appropriate technical or organisational measures”.
- 2.2. PPS also processes data on National Security Vetting carried out by third parties if you carry our work for PPS and your clearance was sponsored by another organisation.

### **3. What categories of personal data are you processing?**

#### **PPS Sponsored Applications**

- 3.1. The exact nature of the data we process about you will depend on the investigations carried out, but where you apply for CTC clearance it will include:
  - identifying data such as name, address, date of birth, National Insurance Number, Telephone Number
  - employment details
  - physical or mental health details
  - partners and other persons you live with
  - your parents
  - any criminal convictions
  - racial or ethnic origin
  - sexual life (where relevant)
  - previous offences (including alleged offences)
  - details of criminal proceedings, outcomes and sentences
  - any additional information you deem relevant to your application

3.2. When you apply for Security Check clearance we will also process the following information:

- financial data including credit checks

3.3. When you apply for Developed Vetting clearance we will also process the following information:

- details of your siblings and your partners family
- additional financial data
- health information
- details of interviews with you and your referees

### **Applications Sponsored by third parties**

3.4. Where PPS is not the sponsor body we process the following data:

- identifying data such as name, address, date of birth, National Insurance Number, Telephone Number
- details of the level, commencement and expiry date of your clearance

## **4. Where do you get my personal data from?**

4.1. Most of the data used in the processing of NSV Applications comes from you as part of your application.

4.2. In addition, PPS also receives the following reports from UKSV:

- criminal record check
- Security Services check
- credit check (SC and DV)
- subject and referee interview notes (DV)

4.3. PPS also receives data from third party sponsors. Normally this is your former employer, or in the case of new entrants to the civil service, HR Connect.

## **5. Do you share my personal data with anyone else?**

5.1. Security Vetting in the PPS is a joint exercise between PPS and UK Security Vetting (UKSV)(part of the Ministry of Defence). The PPS is a "sponsor" organisation which means that we are entitled to request investigations and make vetting decisions. The investigations are conducted on our behalf by UKSV. The following describes the data shared:

- a) PPS shares basic identifying information with UKSV to enable us set up your application
- b) You then share the data detailed in section 3 with UKSV
- c) UKSV then shares relevant data with third parties to carry out additional investigations including:
  - o Security Services
  - o Credit Agencies (SC and DV)
  - o PSNI and Police National Computer (for Criminal Record Checks)
  - o Case Officers (for subject and referee interviews (DV))
- d) UKSV shares a report with the information from b) and c) with PPS

5.2. For details of UKSVs privacy policies and their retention and disposal periods see their [Privacy Notice](#).

5.3. The PPS may share your data with Assistant DSOs in other civil service departments or HR Connect on request. This is limited to the data described in paragraph 3.4. The PPS does not share your data with anyone else except with your consent on a case by case basis.

**6. Do you transfer my personal data to other countries?**

6.1. The PPS does not store your data outside the UK. However other agencies which the PPS shares data with may do so in line with their own policies and procedures.

**7. How long do you keep my personal data?**

7.1. The PPS retains your data for as long as necessary to meet its business needs. These are detailed in the PPS Vetting Policy.

7.2. Investigation papers are held for the following periods:

PPS sponsored applications where Security Clearance refused	3 years
PPS sponsored applications where Security Clearance approved but the applicant has not taken up employment	6 months
PPS sponsored routine CTC and SC clearances (where there is no trace activity in the report)	6 months
PPS sponsored applications with trace activity in the report and all DV clearances	Until expiry of clearance

### 7.3. Details of the security clearance

PPS sponsored applications where Security Clearance refused	3 years
PPS Sponsored Staff with Security Clearance approved but the applicant has not taken up employment	1 year after application approved
Applicants not sponsored by PPS	Upon expiry of employment with PPS
PPS sponsored Contractors	Upon expiry of clearance (unless clearance is being renewed)
PPS sponsored staff	5 years after expiry of last clearance on subject's record

7.4. Data transferred to other agencies is retained in line with their retention and disposal policies.

## 8. What rights do I have?

8.1. If your data is being processed for law enforcement purposes then your rights are as follows:

- To obtain confirmation that your data is being [processed, and access to your personal data](#). However, the PPS is able to restrict this right to avoid prejudicing the prevention, detection, investigation or prosecution of criminal offences or the execution of criminal penalties;
- To have personal data [rectified if it is inaccurate or incomplete](#)
- To have personal data erased and to prevent processing, [in specific circumstances](#).
- In relation to [automated decision making and profiling](#). However the PPS does not carry out automated decision making.

8.2. If your data is being processed for other purposes then you have the following additional rights:

- To 'block' or suppress processing of personal data, [in specific circumstances](#)
- The right to data portability, [in specific circumstances](#)
- The right to object to the processing, [in specific circumstances](#)

## **9. How do I complain if I am not happy?**

- 9.1. If you are unhappy with any aspect of this privacy notice, or how your personal information is being processed, please contact the PPS Data Protection Officer (contact details as shown in paragraph 01).
- 9.2. If you are still not happy, you have the right to lodge a complaint with the Information Commissioner's Office (ICO):

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113

Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

<https://ico.org.uk/global/contact-us/>