



## CAREDIG PRIVACY NOTICE

This privacy notice sets out how Caredig collects and uses information about you.

Please read this privacy notice carefully to understand how we will use your personal information. If you have any questions or queries in relation to this privacy notice, you can contact our Data Protection Officer (DPO) as follows:

- **Email:** [dpo@caredig.co.uk](mailto:dpo@caredig.co.uk)
- **Online:** Feedback-Complaints-Caredig
- **In writing to:** 43 Walter Road, Swansea, SA1 5PN ( Please be aware that complaints will only be logged from the day postage is date stamped as received, so this may delay your complaint response).

This privacy notice explains:

1. What information we may collect about you
2. How we use your information
3. Contacting you
4. Sharing your information
5. Our legal basis for collecting, holding and using your information
6. Security and storage of your information
7. Your rights

### 1. What information we may collect about you

The information we collect about you depends on why we are dealing with you. For example, if you make a housing application or become one of our tenants, we will need more information from you than if you are merely making an enquiry.

Please be assured that we only ask you for information that we need to be able to provide you with a service.

We may collect the information about you in the following circumstances:

#### **If you call us**

We may record calls for training and monitoring purposes. We use this information to help improve its efficiency and effectiveness. We may need to share information with other organisations in order to respond to your call, for example so that we can organise maintenance or repairs or other support. We will usually tell you if it is necessary for us to pass information on to other organisations.

#### **If you email us**

Any email sent to us, including any attachments, may be monitored and used by us for reasons of security and for monitoring. Email monitoring or blocking software may also be used. Please be aware that you have a responsibility to ensure that any email you send to us is within the bounds of the law.

#### **If you make a complaint to us**

When we receive a complaint from a person we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to process the complaint and to check on the level of service we provide. If a complainant doesn't want information identifying him or her to be disclosed to any person that the complaint is about, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

Similarly, where enquiries are submitted to us we will only use the information supplied to us to deal with the enquiry and any subsequent issues and to check on the level of service we provide.

### **If you use our services**

We hold the details of the people who request and use our services so that we can provide these services and for other closely related purposes. For example, we use information about our service users to develop and improve our services and to make sure we are delivering services to different groups fairly.

If you apply for housing or become a tenant, there is certain information that we require in order to process your application and manage your tenancy. If you do not provide us with this information, we will not be able to progress your application.

### **When you visit our websites**

We automatically collect certain information when you visit one of our websites. Please see our Cookies Policy on our website.

### **Information we receive from others**

We work closely with other organisations, such as local councils, police forces, voluntary sector organisations, other housing providers and our contractors, and we may receive information about you from them.

## **2. How we use your information**

We process your personal information primarily in connection with managing our housing services. If you are a tenant, this includes managing your tenancy and dealing with any applications, queries or complaints that you make.

Examples of how we use your information can include:

- to confirm your identity
- to assess your suitability to access any of our services
- to manage your tenancy
- to notify you about important changes to our services
- to let you know about other relevant services, both ours and those of other parties whose products and services we have agreed should be made available to you (see the section below on 'Contacting you' for more information about this)
- to update and correct our records
- to carry out statistical and market analyses, including benchmarking exercises, to enable us to understand you better and improve our services
- to develop, test and improve our systems
- to ensure that content of our website is presented in the most effective manner for you and for your computer
- to administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes
- to improve our website to ensure that content is presented in the most effective manner for you and for your computer

We may combine information we receive from other sources with information you give to us for the purposes set out above (depending on the types of information we receive).

## **3. Contacting you**

We will use your contact information to send you important information [via letters, emails, text messages, or otherwise to telephone you]. We may record telephone calls for security and training purposes.

We may use the information we hold about you in order to provide you with information about our services which we feel may interest you.

We will only contact you by electronic means (e-mail or text) to provide you with a service. We will not use this information for marketing purposes.

#### **4. Sharing your information**

We do not sell your information to any third party, but in certain limited circumstances we may disclose your personal information, but we will always talk to you before we share your information unless there is a legal reason why this is not possible, to:

- organisations we work with, such as:
  - Contractors that undertake repairs in your home
  - Care or support agencies that you may work with
  - If we need to provide you with help and support with money matters
  - Communication services that we use to text or email you
  
- certain other third parties in the following circumstances:
  - if we are under a duty to disclose or share your personal data in order to comply with any legal obligation;
  - contractual requirements where we share with a commissioner as part of the reporting process;
  - in order to enforce or apply our terms and conditions and other agreements;
  - to protect the rights, property, or safety of Caredig, our customers, or others;
  - to investigate or prevent a crime. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction, including utility companies;
  - to obtain any professional advice; and/or
  - with your consent.

#### **5. Our legal basis for collecting, holding and using your information**

Data protection law sets out various lawful legal bases (or 'conditions') which allow us to collect, hold and use your personal information:

- Where you have entered into a contract or contracts with us, we may need to use your information to provide you with our services. An example of this is where you have a tenancy with us.
- Where we are under a legal obligation which requires us to process your personal information, for example a request from the Police.
- We will sometimes use your personal information based upon your consent. We will always tell you where this is the case and ask you to agree before we process your information.
- Finally, sometimes it is necessary to process your personal information for the purposes of our own legitimate interests. We will only do so where these interests are not overridden by the interests and fundamental rights or the freedoms of the individuals concerned.

Data protection law recognises certain "special categories" of personal information, which is information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic information, biometric information for uniquely identifying a person, information concerning health, and information concerning a person's sex life or sexual orientation. Information about criminal offences and records is placed in a similar category.

These special categories of personal information are considered particularly sensitive and so we will only collect and use this information where we need to be able to provide you with a service. We refer to this as 'legitimate business purpose' and we take utmost care to keep your information safe.

#### **6. Security and storage of your personal information**

The information about you that we collect will not be transferred to, and stored at, a destination outside the European Economic Area (**EEA**).

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

We will generally keep personal information about you for the lifetime of your tenancy or contract with Caredig. Your information will be securely deleted six years after your tenancy or contract has ended.

## **7. Your rights**

You have the right to request from us access to your own personal information. This is sometimes known as a 'subject access request'.

You also have the right to ask us not to process your personal data for direct marketing purposes. We will tell you if we intend to use your data for this purpose or if we intend to disclose your information to any third party for this purpose. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data or by contacting us.

You can also request from us:

- That any inaccurate information we hold about you is corrected
- That your information is deleted
- That we stop using your personal information for certain purposes
- That your information is provided to you in a portable format
- That decisions about you are not made by wholly automated means

Many of the rights listed above are limited to certain defined circumstances and we may not be able to comply with your request. We will tell you if this is the case.

If you choose to make a request to us, we will aim to respond to you within one month. We will not charge a fee for dealing with your request.

If you are dissatisfied with how we are using your personal information or if you wish to complain about how we have handled a request, then please contact us and we will try to resolve any issues you may have.

You also have the right to complain to the Information Commissioner's Office, which is the statutory regulator for data protection law. Details of how to complain to the ICO can be found at <https://ico.org.uk/concerns/>.