



Yarlington's Group Privacy Notice

Yarlington is committed to protecting your privacy and takes its responsibilities regarding the security of your information very seriously. This Privacy Notice sets out how we will use and protect all information we collect from you in accordance with Data Protection Legislation. This notice applies to all current, former and potential customers who live in our properties, access or provide our services.

There are also separate specific privacy notices listed below:

1. Colleague Privacy Notice
2. Prospective Employee Privacy Notice
3. Contractor Privacy Notice
4. My Yarlington, your data and you.

We process your data in accordance with relevant Data Protection and privacy laws because processing is necessary to fulfil our contract with you (tenancy, lease agreements, service provision), because there is a legal obligation upon us, it is in our legitimate interests or it is necessary to protect the vital interests of you or another person. Where we need your consent to process information we will ask you clearly for that consent and provide ways for you to easily withdraw that consent at any time.

Who we are

When we say 'we' or 'us' in this policy - we're generally referring to Yarlington Housing Group (Yarlington) itself and our subsidiary companies such as Yarlington Homes Limited, Yarlington Property Management and Inspired to Achieve.

What sorts of information do we collect and hold

Yarlington collects and processes a range of data about you. This includes:

- Name, date of birth of you and any other occupants of the property (prospective & current)
- Current, previous and forwarding addresses
- Martial status
- Next of Kin – this will only be used in case of emergencies and it is assumed that by providing this information you have the consent of the individual concerned to share their information.
- Employment details and state benefit entitlements
- Records of anti social behaviour
- Other agencies involved with your household
- Safeguarding risks to children or other people
- Financial details – bank or building society

- Responses to surveys
- Photo
- ID documents
- Training and educational needs

We also process sensitive classes of information that includes information relating to services, to meet our legal obligations or protect the interests of you or another person:

- Physical or mental health details
- Sexual orientation
- Offences and alleged offences
- Criminal convictions
- Racial or ethnic origin
- Religious or other beliefs of a similar nature

Closed Circuit Television (CCTV)

The CCTV systems installed across Yarlinton's buildings are for safety and crime prevention only. Clearly visible notices are provided where CCTV is used except where covert CCTV is in place for legitimate legal reasons (i.e. in cases of ongoing ASB) The reception area at Yarlinton's Head Office has CCTV and voice recording.

CCTV images can be shared with lawyers, police and other agencies working to prevent or investigate crime, improve public safety or resolve antisocial behaviour.

CCTV images are retained for up to one calendar month or, where applicable until enforcement action is complete. Images that are no longer required will be destroyed.

How we collect information about you

We collect information about you throughout our relationship. This includes:-

- When you apply for a home
- When you sign a tenancy or lease agreement
- Through ongoing contact with customers during a tenancy or the sales process
- When customers access services by logging onto our website or customer portal
- Recording calls to & from us
- When a customer terminates a tenancy or the resale process
- If a customer makes a complaint
- When dealing with ASB cases
- When we provide welfare & benefits advice

In some cases, Yarlinton may collect information about you from third parties, such as local authorities, landlords, health services. We only collect information that is necessary to supply the services under our contract with you, when entering into a contract with you or carry out the transaction you have requested.

How do we use your information?

We process personal information to enable us to provide social and affordable housing accommodation and services which include;

- Letting, renting, leasing and selling properties
- Managing tenancies, leases and property sales
- Collect and receive rent, service charges and charges for additional services
- Administering waiting lists
- Providing associated welfare services, advice and support
- Provide support services
- Maintaining our accounts and records
- Supporting and managing our customers
- Provide repairs and maintenance service
- Training and monitoring service provision
- Resolve ASB disputes
- Investigate complaints
- Provide education, employment and training advice.
- Fraud and money laundering prevention.
- Process requests from 3rd parties e.g. council tax, shelter, homelessness team
- To better understand your needs
- To make organisational improvements
- To engage with our customers to get feedback on our services
- To send, with your consent, details of promotions, opportunities and special offers which may be of interest to you
- To get in touch, with your consent, via phone, email or post
- To comply with our legal obligations.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research, surveys or statistical purposes in which case we may use this information indefinitely without further notice to you.

Who we might share your information with

In order to effectively carry out our services and critical activities, parts of your information will be shared internally and we sometimes need to share personal information we process with the individual themselves and also other organisations. Where this is necessary we will comply with all aspects of Data Protection legislation. What follows is a description of the types of organisations we may need to share some of the personal information we process with for one or more reasons. We will not share your information without consent unless allowed to by law.

Where necessary or required we may share information with the below (where appropriate):

- Contractors
- Local authorities
- Benefits departments
- DWP

- Social services
- Support agencies
- Health services
- Police
- Probation services
- Emergency services
- Professional bodies
- Educators and examining bodies
- Family, associates and representatives of the person whose personal information we are processing. (with your permission)
- Suppliers and service providers
- Other landlords (with your permission)
- Utilities companies
- Council tax
- Courts and tribunals
- Housing regulators
- Central government
- Auditors
- Debt collection agencies
- Credit reference agencies
- Survey and research organisations
- Charities and voluntary organisations (with your permission)
- Press and the media (with your permission)
- HomeBuy agents

Legal Requirements

We may however share your personal information in cases where we are legally obliged to do so for e.g.:

To comply with the law

To seek legal advice for court proceedings or statutory action to enforce compliance with tenancy conditions

To provide you with the services you require, for example support plans and repairs.

Where there is a clear health and safety risk

Where there is child protection or safeguarding issues (including vulnerable adults).

Where there is a clear risk to you, staff or others

How long do we keep your information for?

We will always retain your information in accordance with the law and regulation and never retain your information for longer than is necessary.

Your basic tenancy information (i.e. your name) will be stored permanently against any tenancies you have had with us but once your tenancy has ended, we will not generally use

your information unless there is a legal requirement or you have asked for an additional service i.e. reference.

Other personal information will be retained for the length of your tenancy with the exception of where monies are owed, or there are ongoing legal matters to be resolved.

Recordings of standard telephone conversations are held for up to four weeks. Recordings of conversations that are deemed abusive or threatening will be kept until all relevant investigation actions are complete. Access to call recordings is through sampling apart from for training purposes or when abusive or threatening behaviour has occurred or a complaint has been made and requires investigation. Access in these cases requires authorisation by the appropriate department Manager or Head of Service.

Information security

Yarlington takes the security of your data seriously. It has internal policies, controls (electronic , physical and managerial) and procedures in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties. These security measures include:

- Limiting access to our building to those we believe are entitled to be there (by the use of key card passes and ID Badges)
- Implementing access controls to our technology and devices, such as firewalls, ID verification, and encryption.
- Never asking for your passwords.
- Maintaining Cyber Essentials Certification.

If you are registered with My Yarlington, you are the owner of your username and password. You must not share this information with anybody else.

International Transfers

It may sometimes be necessary to transfer personal information overseas for the purposes set out in this notice. Where this is necessary this may be to countries or territories around the world other than the EU. If we do this your personal information will continue to be subject to appropriate safeguards as set out in Data Protection Legislation.

Links to other websites and use of digital platforms

Yarlington will sometimes provide you with links to other websites, but these websites are not under our control. We will not be liable to you for any issues arising in connection with their use of your information, the website content or the services offered to you by these websites. Therefore we would advise you to consult the privacy policy and terms and conditions on each website to see how they may process your information.

In addition when using other digital platforms such as Facebook and social networks please remember it is your responsibility to set appropriate settings on your accounts so you are comfortable with how your information is used and shared on them.

Your rights

Access and correction of your personal information

You have the right to a copy of the personal information that we hold about you. This is often called a subject access request (SAR). There are limits to this rights such as where the disclosure of such information would unreasonably impact the data protection rights of a third party.

Before providing personal information to you or another person on your behalf, we may ask for proof of identity and sufficient information about your interactions with us so that we can locate your personal information. There is a SAR form (LINK) available to use should you wish to make a request this can be submitted via My Yarlinton (the customer portal) or emailed to GDPR@yhq.co.uk, other methods of contact can also be used as detailed in the '**Contact Us**' section.

If any of the personal information we hold about you is inaccurate or out of date, you can request that it be corrected or updated. Or you can amend it yourself log in to **My Yarlinton** and edit account.

Right to stop or limit our processing of your data

You have the rights, in certain circumstances, to limit or object to our use of your personal information. Also you have the right to ask us to delete your personal information if there is no longer or lawful reason for us to use it.

Right to data portability

You have the right to receive and reuse your personal information, which you have provided to us, for your own purposes across different services. This applies where the processing is based on your consent or for the performance of a contract and when processing is carried out by automated means.

Consent

In some circumstances your consent is the legal basis for us using your information.

This will be freely given by you for a specific purpose by way of an active step or action, not through inactivity, silence, or pre-ticked boxes.

You have the right to change your mind at any time and withdraw your consent. The consequence might be that we can't do certain things for you. This can be done through the customer portal – My Yarlinton or by emailing GDPR@yhq.co.uk.

Contact us

If you would like to exercise any of these rights or have a question about this policy or the way your personal information is used please contact us by one of the following means:

Yarlinton's Data Controller can be contacted at GDPR@yhq.co.uk.

Online: Through logging in to the customer portal – My Yarlinton

By Phone: Customer Service Centre (Yarlinton First) – 01935 404500

By Post: Data Controller, Business Assurance, Yarlinton Housing Group, Lupin Way, Yeovil, Somerset BA21 8WN.

Lodge a Complaint with the Supervisory Authority

You have the right to lodge a complaint to the Information Commissioner's Office (UK's Supervisory Authority) go to www.ico.org.uk or ring 0303 123 1113 to find out more.