



Home Buyer 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 customers who acquire a freehold property interest from us.

As our customer, we process your data in accordance with relevant Data Protection legislation, this Privacy Notice and our General Data Protection Policy.

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 company Yarlington Homes Limited.

What sorts of information do we collect and use

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

- Name,
- Address
- Email address
- Telephone number
- Date of birth
- Your solicitors contact details
- Records relating to your interactions with our staff and our contractors
- Financial details – bank or building society account details
- Responses to surveys
- Photo id documentation

We may also process special categories of information that enable us to comply with our legal obligations under Equalities legislation eg. ethnic origin

Closed Circuit Television (CCTV)

The CCTV systems installed in certain Yarlington buildings are for safety and crime prevention only. Clearly visible notices are provided where CCTV is used. The reception area and interview rooms at Yarlington'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.

Yarlington has a CCTV policy which can be accessed via our website –YHG.co.uk

How we collect information about you

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

- When you make enquiries about our homes either directly or through our estate agents
- When you visit our offices or developments
- When you offer to buy a home, either directly or through Homes England Help to Buy scheme
- When you sign a purchase agreement
- Through ongoing contact with customers during the sales process
- When customers access information by logging onto our website or through social media
- Recording information from calls and on-line chats to & from us
- If a customer makes a complaint or wishes to notify us of a fault under the sales guarantee
- When carrying out a customer satisfaction survey

How do we use your information?

We only collect information that is necessary to enable us to answer your enquiries and provide you with details of properties and developments which we believe may interest you; also to facilitate the entry into a sales contract with you, to carry out after sales obligations to you, and to improve the quality of our products and services.

In meeting these aims, we may also:

- communicate with you using the contact details you have provided to us.
- administering waiting lists
- maintaining our accounts and records
- provide customer support
- train our staff and monitoring service provision
- monitor and resolve of complaints and disputes
- ensure the protection of our staff , contractors and other customers or visitors to our properties and developments
- ensure payment of all money owed to us
- prevent fraud and money laundering as required by law
- endeavour to better understand your needs and improve our service quality to you
- engage with you in order to get feedback on our services
- send, with your consent, details of promotions, opportunities and special offers which may be of interest to you
- comply with our legal obligations, and where necessary, seek legal advice and bring and defend legal claims.

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

Where it is necessary to share information about you we will always comply with all aspects of Data Protection legislation. Set out below are examples of when this may occur.

Some of your information will be shared internally, with those parts of our organisation that are involved in supporting our services to you.

Where necessary we may share information with:

- Contractors (who carry out after sales defect repair/replacement)
- Police and law enforcement agencies
- Post sales mortgage administrators, independent financial advisors, solicitors
- Utilities companies
- Courts and tribunals
- Housing regulators
- Central government
- Auditors
- Credit reference agencies
- Survey and research organisations
- Estate agents
- Solicitors

Lawful Grounds

We collect, use and occasionally share your information for reasons which are recognised as lawful. These include:

1. the performance of our obligations under our sales agreement
2. compliance with obligations imposed by law on us as property developers and providers of affordable housing;
3. protecting the vital interests of our customers, staff or contractors when their life, health or well-being are seriously at risk
4. the performance of a task carried out in the public interest, namely providing affordable housing
5. our legitimate interest in:
 - developing and selling housing stock which meets customer needs;
 - helping to make the communities where our purchasers and tenants live safe and secure environments
 - protecting the viability of our business, so that we are able to continue building and providing affordable housing to people who need it
 - taking legal advice or bringing legal proceedings to defend our interests and rights.
6. when you have provided us with your consent, eg. to allow us to send you information about services and opportunities that might interest you as purchasers of our housing stock. For more information on consent see page 5 of this Notice.

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.

We will keep the information we hold about you for a period 6 years after the slae is completed. However if there is an ongoing dispute with you, or if you have asked for an additional service from us we will hold your records for as long as it takes to complete the actions necessary to resolve these issues.

Recordings of standard telephone conversations with customers are held for up to four weeks. When abusive or threatening behaviour has occurred or a complaint has been made and requires investigation, access to the recorded calls requires authorisation by the appropriate department Manager or Head of Service. Recordings of conversations that are deemed abusive or threatening will be kept until all relevant investigation actions are complete.

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 unlawfully to others, and is only accessed 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.

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 right such as where the disclosure of the 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 a 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.

Consent must be freely given by you for a specific purpose; we will always clearly explain why we need the information we have asked you for. Consent must be clearly given; so we never assume your consent, or use pre-ticked boxes to communicate consent.

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. Consent can be withdrawn using the customer portal – My Yarlinton, by emailing GDPR@yhq.co.uk, or by writing to us at the address given below.

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 Yarlinton's Data Protection Officer by one of the following means:

By email at GDPR@yhq.co.uk.

By Phone: Customer Experience Service Centre – 01935 404500

By Post: Data Protection Officer, 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.