



Next of Kin 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 relevant to you, which we collect from you or from our customers and employees who have asked that you be designated as their next of kin and emergency contact.

Throughout the rest of this Notice we will refer to you as 'Next of Kin'

We process Next of Kin data in accordance with relevant data protection and privacy laws (notably the General Data Protection Regulation, or 'GDPR' and the Data Protection Act 2018) and we do this for two reasons (called 'lawful grounds'): firstly because it is in our legitimate interests to ensure we have reliable emergency contact data for our staff and customers; and secondly, when we have secured your consent because it may help us to manage the needs of our staff and customers.

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. Under GDPR Yarlington is the Data Controller of the personal information it holds about the Next of Kin of its Customers and Employees.

What sorts of information do we collect and hold

Yarlington collects and processes only the following information about our Customers' and Employees Next of Kin:

- Name,
- Contact address
- Telephone number
- Email address
- Records of your interactions with our staff relevant to our Customer or Employee
- Responses to surveys that you may complete

How do we use your information?

We process Next of Kin information to facilitate our communication with Customers or Employees when direct communication with them may not be possible, and to respond effectively to our Customer's or Employee's needs particularly in emergencies.

Who we might share your information with

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

Some of your information will be shared internally, with those parts of our organisation that are involved in supporting our services to the Customer, or providing assistance to the Employee.

Occasionally we may need to share your information with other organisations. We will only do so when we you have provided us with a consent to disclose your information to such organisations; or in an emergency when the Customer's or Employee's health or wellbeing is at serious risk.

Other than the situations described above we will only share your information when we are legally obliged to do so.

How long do we keep your information for?

We will always retain your information in accordance with data protection legislation and never retain your information for longer than is reasonably necessary for the purposes we described above. In general we will keep your information for as long as you remain the designated Next of Kin for our Customer or Employee.

If you are the Next of Kin of a Customer, once that Customer's tenancy comes to an end, their tenancy record will be retained for a further 2 years and Next of Kin information remains on that record for the same period, in case we need to contact you about anything concerning the Customer.

If you are the Next of Kin of an Employee, once the Employee's employment comes to an end, your information will remain connected with their employment file for a further period of 7 years.

Recordings of standard telephone conversations with Customers or their Next of Kin are held for up to four weeks after the call is made. These recordings help us to resolve complaints and generally to improve service quality standards. 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.
- Maintaining Cyber Essentials Certification.

If you assist a Customer, as their Next of Kin, in using the My Yarlington Customer portal you must not share their user name and password 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.

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 on the YHG.co.uk website which you can use, should you wish to make a request. This can be submitted by email 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 Yarlington** 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

As mentioned above in most circumstances your consent is the legal basis for us using your information.

Consent must be freely given by you and for a specific purpose; we will always clearly explain why we need the information we have asked you for or have obtained from our Customer. 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 no longer do certain things for you or our Customer. Consent can be withdrawn 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 Yarlington's Data Protection Officer by one of the following means:

By email at GDPR@yhq.co.uk.

By Phone: Customer Experience Service Centre (Yarlington) – 01935 404500

By Post: Data Protection Officer, Business Assurance, Yarlington 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.