



## **Yarlington's Stakeholder 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 those of our stakeholders who engage with us and provide valuable support in assisting us to meet our business aims. Whilst we consider our employees, customers and contractors as key stakeholders, the particular nature of our relationship with these individuals means that we have developed stand-alone Privacy Notices tailored to their needs which are accessible through our website [YHG.co.uk](http://YHG.co.uk).

We process stakeholder personal data in accordance with relevant Data Protection and privacy laws. In doing so we rely on the fact that it is reasonably necessary and in our legitimate interests to encourage and facilitate stakeholder involvement in our business. In any case where we need your consent as a stakeholder to process your information, we will ask you clearly for that consent and provide the means 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 as a stakeholder. This includes:

- Names and titles
- Age
- Addresses and other contact information (telephone, email and social media accounts)
- Records of your interaction with us, eg attendance at our events
- Your opinions or statements made about particular matters that are of importance to us
- If you have signalled your interest in particular matters that affect our business
- Biographical information
- Photos (always with your prior consent)
- Your IP address (when you visit our website)

We also process sensitive classes of information that might include your ethnicity and other information covered by Equalities legislation.

### **Closed Circuit Television (CCTV)**

The CCTV systems installed across Yarlinton properties 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.

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 meetings, events, online and digital communications and telephone conversations (some of which may be recorded for quality monitoring).

In some cases, Yarlinton may collect information about you from third parties, such as the media, professional bodies, other housing associations, other stakeholders or employees of Yarlinton who know you and are aware of your experience and potential willingness to get involved in activities which are supportive of our corporate aims. We only collect information that is necessary to facilitate our engagement with you.

### **How do we use your information?**

Our overriding purpose in collecting and using personal information is to provide social and affordable housing and related services to our customers. To meet this aim we need to engage with stakeholders who have the right kind of skills, knowledge, experience and influence to help us achieve our objectives. Engagement covers a wide range of activities, including:

- getting in touch, via phone, email, social media or post (where appropriate, giving you the chance to opt out whenever you choose)
- for internal management reports
- commissioning works and/or services from third parties
- organising meetings and events
- briefing the press
- producing promotional materials
- holding archive materials that will allow us to compile histories of our organisation

### **Who we might share your data with**

We will only share your personal information in the following ways:

- with those Yarlinton staff who need to see it in order to carry out their roles

- when you have agreed to feature in our promotional material or press releases, with those recipients of that material
- when you have agreed to be cited in other briefing documents, with the recipients of those documents
- if we are compelled to do so by law, or permitted to do so when defending or bringing legal claims
- where there is clear risk to health or safety

### **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 to meet the purposes we have described.

### **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.
- 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.

### **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. 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](mailto: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.

### ***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.

### ***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](mailto: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 Protection Officer can be contacted at [GDPR@yhq.co.uk](mailto:GDPR@yhq.co.uk).

**By Phone:** Customer Engagement 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](http://www.ico.org.uk) or ring 0303 123 1113 to find out more.