



## Customer 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 as a Customer of Yarlington in accordance with Data Protection Legislation. This notice applies to all current, former and potential customers who live in our properties as a tenant, shared owner, occupier or other kind of lessee or sub-lessee, and access the housing related services we provide.

We have other specific privacy notices (listed below), which may also apply to you if you have another kind of relationship with Yarlington. You can also find these on our website:

1. Colleague Privacy Notice
2. Job Applicant Privacy Notice
3. Work Experience Privacy Notice
4. Contractor Privacy Notice
5. Independent Living Privacy Notice
6. Home Buyer Privacy Notice
7. Next of Kin Privacy Notice
8. Customer's Authorised Contact Privacy Notice
9. Stakeholder Privacy Notice
10. I2A Privacy Notice

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 companies such as Yarlington Homes Limited, and Yarlington Property Management

### **What sorts of information do we collect and hold**

We collect and process 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
- Next of Kin details
- Employment details and state benefit entitlements

- Records of anti social behaviour
- Records relating to your interactions with our staff
- Information concerning your obligations to us as our tenant or lessee, including rent payments and arrears, or service charges, and compliance with your tenancy contract or lease agreement
- Other agencies involved with your household
- Safeguarding risks to children or vulnerable adults (for more information you can find our Safeguarding Policy at [yhg.co.uk](http://yhg.co.uk))
- Financial details – bank or building society account details to enable Direct Debit payments
- Responses to surveys
- Photos
- Copies of ID documents

We also process special categories of information that enable us to provide services that will meet your needs, and protect the interests of you or others; and also to comply with our legal obligations under Equalities legislation. These categories include:

- Physical or mental health and disability details
- Criminal offences, alleged criminal offences, and unspent convictions
- Equalities data, including ethnic origin and sexual orientation

### **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 and interview rooms at Yarlinton's Head Office have 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 8 weeks or, where applicable until enforcement action is complete. Images that are no longer required will be destroyed.

Yarlinton has a CCTV policy which can be accessed via our website –[YHG.co.uk](http://YHG.co.uk)

### **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, shared ownership or lease agreement
- Through ongoing contact with customers during a tenancy or lease
- When customers access services by logging onto our website or customer portal
- Recording information from calls and on-line chats 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
- When you respond to our surveys

In some cases, Yarlington may collect information about you from third parties, such as local authorities, landlords, health services or the police. We only collect information that is necessary to supply the services under our contract with you, when entering into a contract with you, to carry out the transaction you have requested or as a result of our commitment to participate voluntarily in the Commitment to Refer initiative, aimed at reducing homelessness.

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

We process personal information to enable us to manage our business of providing social and affordable housing, accommodation and services, which may include any of the following;

- Letting, renting, leasing and selling properties (including shared ownership, right to buy and right to acquire)
- Managing tenancies and leases
- To facilitate tenant mobility by enabling mutual exchange of rented properties
- Maintaining and repairing our rented or leased properties
- Collecting and receiving rent (including arrears), service charges and charges for additional services;
- Administering waiting lists
- Providing certain welfare and benefit related services, advice and support
- Maintaining our accounts and records
- Provision of customer service
- Ensuring that our properties are kept in good order
- Training and monitoring service provision
- Monitoring and resolution of ASB behaviour and disputes
- Safeguarding of children and vulnerable adults who live in or nearby our properties
- Ensuring the protection of our staff, contractors and those other tenants or visitors to our properties who may be affected by criminal or anti-social behaviour
- Investigating complaints
- Providing education, employment and training advice (through our associated company, I2A)
- Fraud and money laundering prevention.
- Processing requests from 3<sup>rd</sup> parties e.g. council tax, shelter, homelessness team
- Better understanding your needs and those of our other tenants who will live in proximity to you
- Making organisational improvements
- Engaging with our customers to get feedback on our current services and any improved or expanded service offers which we may provide or procure from others for your benefit in future
- Providing details of promotions, opportunities and special offers which may be of interest to you (with your consent where appropriate)

- Getting in touch with you via phone, email, post or the My Yarlington portal
- Complying with our legal obligations, including health and safety.
- Managing legal risk and obtaining legal advice/representation where necessary

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.

We sometimes need to share personal information we process with others, including: next of kin (particularly in emergencies or when we urgently need to carry out gas safety inspections and are struggling to fix an appointment with you); anyone who have been designated by you as authorised to receive information in specific circumstances, or to help you manage your account with us.

Occasionally we may need to share your information with other organisations. We will only do so when we have a lawful basis, either because you have consented or the Data Protection legislation enables us to do so for another reason.

Where reasonably necessary and lawful, we may share certain information with:

- Contractors (who carry out repairs, maintenance and installations)
- Local authorities (including homelessness units, social services and council tax depts)
- Agencies involved in benefits and tax credits (including DWP)
- Organisations which provide educational and career based training (**always with your permission**)
- Pensions Service
- Charities and voluntary agencies (**always with your permission**)
- Health services (including GP)
- Police and law enforcement agencies
- Probation services
- Emergency services (**in an emergency where there is serious risk to your health**)
- Schools and examining bodies
- Anyone you have appointed as your authorised contact for management of your tenancy, or who is formally registered (by the Office of the Public Guardian) as your lawful attorney under a Lasting Power of Attorney.
- Home service and care providers
- Other landlords (**always with your permission**)
- Utilities companies
- Courts and tribunals
- Housing regulators

- Central government
- Auditors
- Debt collection agencies
- Credit reference agencies
- Survey and research organisations
- Press and the media (**always with your permission**)
- Financial service providers and advisors
- Mortgage administrators
- 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 landlords obligations under your tenancy, lease or shared ownership contract with us;
2. compliance with obligations imposed by law on us as landlords;
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 eg. safeguarding of children and vulnerable adults;
5. our legitimate interest in:
  - preparing to enter into a contract with you (tenancy, shared ownership or lease) including all necessary due diligence and disclosure
  - taking due care of our housing stock,
  - ensuring that payment due for utility bills incurred while living in our housing is paid by our tenants, or former tenants
  - helping to make the communities where our tenants or lessees live safe and secure environments
  - protecting the viability of our business, so that we are able to continue providing affordable housing to people who need it
  - contributing to the government and local authorities efforts to reduce homelessness within our communities
  - taking legal advice or bringing legal proceedings; and
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 our tenants. For more information on consent see page 7 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.

Your basic tenancy or lease information (i.e. your name, date of birth and address while a Yarlington tenant) will be stored permanently against any tenancies you have had with us but once your tenancy has ended, we aim to delete all other information (except that relating to anti-social behaviour, breaches of tenancy and any money you still owe us) within 2 years.

We will keep the information for longer (up to 6 years after your tenancy has ended), if there is an ongoing dispute with you, or if we hold records of anti-social behaviour or debt, or if you have asked for an additional service from us.

Recordings of standard telephone conversations 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.

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 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](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. 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](mailto: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](mailto:GDPR@yhq.co.uk).

**Online:** through logging in to the customer portal – My Yarlington

**By Phone:** Customer Experience Service Centre – 01935 404500

**By Post:** Data Protection Officer, Business Assurance, Yarlington Housing Group, Lupin Way, Yeovil, Somerset BA21 8WN.

***Lodge a Complaint via our Complaints Team***

You can lodge a complaint about the handling of your personal data at any time by calling our Customer Service Centre – 01935 404500; or by emailing [GDPR@YHG.co.uk](mailto:GDPR@YHG.co.uk)

***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.