

Policy name:	
Privacy Notice - General	
Section:	Finance and resources
Exec responsible:	Governance Manager
Review by:	Governance Manager
Tenant review:	no
Authority to amend:	CEO
Frequency of review:	Every three years
Last review:	September 2022
Next review:	December 2025
Responsibility for delivery:	Governance Manager
Strategy:	Corporate and KIM
Associated risk ID:	Risk 2 - regulation
Health & safety:	none
Equality & diversity:	Available on the website in an accessible form
Associated costs and value for money:	none
Associated documents:	Data protection policy Tenant handbook

VERSION CONTROL			
Version number:	Sections amended:	Date of update:	Approved by:
1.0	First version in template	December 25	

Cornerstone Housing Privacy Notice

Welcome to Cornerstone Housing's privacy notice.

We respect your privacy and are committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

This privacy notice applies regardless of how you provide personal data to us, including the following circumstances:

- When you apply for housing provided by us
- If you are a tenant of a Cornerstone Housing property
- If you participate in a shared ownership scheme or purchase a property from us
- When you purchase or request services to be provided by us or our contractors
- When you use our website
- If you have contacted us with a problem or query

Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how Cornerstone Housing collects and processed your personal data obtained by any method, including data you may provide through our website, when you make an enquiry, sign up to our newsletter, apply for a tenancy or any housing provided by us, participate in a shared ownership scheme, purchase a property from us or request to use or be supplied with any of our services.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how

and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Third-party links on our website

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

Controller

Cornerstone Housing is the controller and responsible for your personal data (collectively referred to as “we”, “us”, or “our” in this privacy notice).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

Contact details

Full name of legal entity: Cornerstone Housing Limited is a charitable housing association registered with the Homes and Communities Agency (number L0147). Cornerstone Housing Limited is a registered society under the Co-operative and Community Benefit Societies Act 2014 (registration number 14457R). Registered office: Cornerstone House, Western Way, Exeter, EX1 1AL.

ICO registration number: **Z7214321**

Name or title of data protection officer: Nicky Hallam

Email address: nicky.hallam@cornerstonehousing.net

Telephone number: 01392 273462

Postal Address: Cornerstone House, Western Way, Exeter, EX1 1AL

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender identity.
- **Contract Data** includes home address, email address and telephone numbers necessary for us to enter into a contract for services with you.
- **Financial Data** includes bank account and payment card details where we take payments from you for our services. Bank statements, details of income and expenditure for the purposes of affordability checks and budgeting support.
- **Transaction Data** includes details about payments to and from you and us, for example the amount and timing of payments for rent made by you to us.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We may collect **Special Categories of Personal Data** this includes:

- Information about your health where that is necessary for us to provide our services to you, for example where we provide you with accommodation or services adapted to your needs.

- We may also collect information on ethnicity, sexuality, religion, marital status in order to report on the demographics of our tenants and ensure services are appropriate.

We may also collect information about criminal convictions and offences where that is relevant to your use of our services or housing provided by us.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

How is your personal data collected?

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you :

- apply for housing;
- create an account on our website;
- subscribe to our service or publications;
- use our services;
- provide feedback.

Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy on our website for further details.

Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:

- Department of Work and Pensions;
- Ministry of Housing, communities and Local Government;
- Other landlords;
- Debt collection agencies;
- Health Authorities or Health Professionals.

How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation and appropriate safeguards are in place to protect your fundamental rights.
- Where it is necessary for the establishment, exercise or defence of legal claims.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as an applicant for housing	(a) Identity (b) Contact (c) Special Category Data (d) Criminal convictions (e) Financial information	(a) Performance of a contract with you (b) Necessary for the purpose of carrying out our obligations in law (c) Necessary for reasons of substantial public interest
To process and deliver our service including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To administer and protect our operations	(a) Identity (b) Contact (c) Technical (d) Special Category Data (e) Criminal convictions	(a) Necessary for our legitimate interests (for running our operations, administration, to prevent fraud and in the context of a reorganisation or group restructuring exercise) (b) Necessary for the purpose of carrying out our obligations in law (c) Necessary for reasons of substantial public interest

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

You will receive marketing communications from us if you have requested information from us or purchased from us or if you provided us with your details and, in each case, you have not opted out of receiving that marketing.

You may opt out of receiving these communications from us at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of your tenancy or any other contract, service or other transaction with us.

We do not share your personal data with any third party for marketing purposes.

Cookies on our website

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of your personal data

We may have to share your personal data with the parties set out below:

- Service providers acting as processors who provide IT and system administration services or carry out repairs or cleaning at our properties.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

- Local Authorities such as district, borough and city councils or government departments such as the Department for Work and Pensions and Department for Communities and Local Government where we are under a legal obligation to provide them with your personal information.
- The Police where that is necessary to protect the safety of our tenants, staff and third parties and to prevent damage to property.
- Third parties to whom we may choose to sell, transfer, or merge parts of our operations or our assets. Alternatively, we may seek to acquire other operations or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
- Utility companies, Council Tax Offices and their representatives – in connection with the setting up and supply of services and unpaid bills (e.g. gas, electricity, council tax and water)

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

International transfers

We do not transfer your personal data outside the European Economic Area (**EEA**).

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers and tenants (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers or tenants.

We will keep basic information about your tenancy for 60 years so that we have a record if you wish to take part in any Right to Buy schemes in the future.

Where you have applied for a shared ownership property, we will keep all applications for 6 months and shortlisted applications for 12 months. Details of shared owners will be kept for 6 years after they have moved on or purchased the property.

In some circumstances you can ask us to delete your data: see below for further information.

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

Your legal rights

Under certain circumstances, you have the following rights under data protection laws in relation to your personal data:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Right to be informed – you have the right to be informed about how we use your data. This privacy notice sets this out. If you require additional information, please contact us.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to

automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us in writing via email to mail@cornerstonehousing.net by post to: The Data Protection Officer or Customer Services Team, Cornerstone Housing Limited, Cornerstone House, Western Way, Exeter, EX1 1AL or by telephone 01392 273462

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.