

CARTREFI CYMUNEDOL GWYNEDD PRIVACY POLICY

Cartrefi Cymunedol Gwynedd Cyf is a Registered Society under the Community Benefit Societies Act 2014, registered with charitable rules and is a Registered Social Landlord (RSL). CCG is regulated and registered with the Welsh Assembly Government. CCG will not trade for profit. As an RSL our primary purpose is to provide affordable rented housing.

CCG is committed to preserving your privacy and is committed to the protection of it. CCG is registered with the Information Commissioner (IC) under the Data Protection Act 1998. This privacy policy explains why and when we collect your personal information, and how we use any personal information we collect about you.

Data Protection principles

- The Data Protection Act lists eight data protection principles, which CCG is obliged to follow:
 - Personal data shall be processed fairly and lawfully.
 - Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.
 - Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
 - Personal data shall be accurate and, where necessary, kept up to date.
 - Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
 - Personal data shall be processed in accordance with the rights of data subjects under this Act.
 - Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
 - Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

Information we collect from you

We will collect information about you when you use our services, for example when applying for a property or when you become a tenant. When you contact us you may be asked to provide certain information about yourself including your name and contact details. We also collect information when you voluntarily complete customer surveys, provide feedback and participate in competitions.

- We may collect, process and store information such as:

- Tenant names, date of birth, National Insurance numbers, photographs, contact details and preferences
- Tenant demographic data (e.g. religion or belief, ethnicity)
- References from landlords, support providers or other people vouching for applicants' suitability as a tenant
- The details of other family members or people living in our properties
- Rent payments made
- Income and expenditure estimates
- Repairs requested
- Application or referral forms
- Tenancy agreements
- Physical and mental health or condition
- Support contracts
- Support plans and details of support providers
- Complaints about our services
- Responses to surveys or involvement initiatives
- Allegations of anti-social behaviour
- Convictions, proceedings and criminal acts
- Correspondence to and from our residents, service users, other agencies or advocates
- Recordings of telephone calls made to and from the organisation
- CCTV images (If you live in a supported accommodation project with the provision of CCTV; the CCTV systems record and retain information for up to a month to safeguard your health and security).
- Recording of conversations taken by staff activating their lone working devices

We may apply markers to your information (for example, in relation to your vulnerability or health status) to enable us to tailor and deliver services to you. It is important that you notify us of any changes to your personal information.

When using the website (www.ccgwynedd.org) no personal information other than the IP address, web browser and device used will be recorded.

CCG may use a third party website such as Survey Monkey or Lime Survey to consult the views of customers – when this happens we will only collect anonymised information and no personally identifiable information will be collected or stored.

How we will use the information about you

We collect personal information about you to process applications for housing and to manage activities related to your tenancy including the provision of services to you. The information you provide to us may be shared with third parties, who act on our behalf for the purposes of providing property management and tenancy services, or for other purposes approved by you. We will also share your information with Electricity and Gas suppliers at the commencement of tenancy in order to ensure continuity of service to you. We will also advise Welsh Water who occupies our rental properties under the Water Industry (information about Non-Owner Occupiers)

(Undertakes Wholly or Mainly in Wales Regulations) 2014. We may also share your personal information with statutory bodies such as Gwynedd Council housing benefit officers, North Wales police for the purposes of crime prevention. Unless required or permitted to do so by law, we will not otherwise share, any of the personal information you provide to us without your consent.

Sharing your Personal Information

- Access to your information will normally be limited to ourselves. However, there may be occasions when we disclose your details to others in accordance with information sharing protocols.

With your consent

- We will usually obtain your consent before referring you to another service, an activity that requires us to share your contact and background information with the organisation that provides the service.

Legally obliged

- We will share specific and relevant information with law enforcement and government agencies or public bodies where we are legally required to do so. Examples may include:
 - The prevention or detection of crime and fraud
 - The apprehension or prosecution of offenders
 - The assessment or collection of tax or duty owed to customs and excise
 - Sharing in connection with legal proceedings
 - Sharing in relation to the physical or mental health of an individual, where disclosure is required to protect them or others from serious harm
 - Research and statistical purposes.
 - Welsh Water

We may also share your information with emergency services and local authorities, where this is necessary to help them respond to an emergency situation that affects you.

Contractors and suppliers

We may share your personal information with our suppliers who enable us to provide services to you, or who provide services on our behalf. Examples of those suppliers are: specialist maintenance contractors who carry out work in tenants' homes; companies that assist us in mailing out our notices and letters, utility providers in order to provide continuity of service to you and the fire service. The data shared is the specific information the supplier requires to carry out their task, as well as any information that ensures we fulfil our health and safety obligations to the people carrying out the task.

CCG remains responsible for the fair and lawful processing of personal data shared with suppliers. We ensure this occurs through setting data protection requirements in contracts with our suppliers.

Partner agencies

We may enter into partnerships with other organisations such as local authorities, the fire service and the police in order to fulfil our statutory obligations and landlord duties. We will enter into a formal data sharing agreement to govern the process and ensure it is lawful. That agreement will be approved by our Data Protection Officer before it is implemented.

Supported Tenants

- Tenants' personal matters will be discussed within the supported staff team and other staff involved with the welfare of the tenant, however these discussions will be in confidential settings. If a young adult asks a staff member to arrange support from an external service, they must consent to the disclosure of any personal information beforehand.

Disclosure of personal information without consent will be exceptional and only if required by law, a court order, or where overriding health and safety considerations apply.

Security and data retention

We employ security measures to protect your personal information from access by unauthorised persons and against unlawful processing, accidental loss, destruction and damage. We will retain your information for the period you remain a tenant and for a reasonable period thereafter or for as long as the law requires and in accordance with CCG's retention policy.

- We aim to ensure that staff and board members do not misuse any confidential information, or pass on this information improperly to a third party. We protect personal information by applying technical measures, implementing policies, training staff and reviewing our processes in accordance with CCG's retention policy.

Secure storage

- Paper files and records containing personal information are kept in secure cabinets. These cabinets are locked when they are not in use. Staff are provided with guidance on secure handling of records when taken from the office – for example, when carrying out a home visit.
- We ensure any information on our computer system is secure, accurate, relevant and necessary. All our computers are secured with passwords, and staff are all fully trained on our systems. The personal data held on mobile IT

devices is minimised, encrypted wherever possible and technical measures taken to secure data should a device be lost or stolen.

Telephone enquiries

When a customer contacts us by phone, they will be asked to provide a piece of identifying data (e.g. date of birth) to ensure that personal information is only disclosed to the correct person. If a tenant would like someone else to contact us on their behalf they need to confirm that to us directly, or if it is an ongoing arrangement, complete an access to personal information form.

Complaints

If someone contacts us to raise a complaint on your behalf we will always seek your permission first. This is because in responding to the complaint, the person claiming to represent you might view some of your personal data.

Rent enquiries

If you want to make an enquiry about your rent, e.g. your payment history or the balance of your account, we will ask you to provide your name, address and post code, your date of birth and your Rent Reference Number. Every tenant has their own unique Rent Reference Number which is listed on your regular rent statements. If you do not know your Rent Reference Number we may ask for other personal information to verify your identity before giving you any details about your rent account.

Access to your information and correction

You have the right to request a copy of the personal information we hold about you. If you would like a copy please contact our Data Protection Officer enquiries@ccgwynedd.org.uk or write to us at: Cartrefi Cymunedol Gwynedd, PO Box 206, Bangor, Gwynedd. LL57. We are entitled by law to charge a fee of £10 to meet our costs in providing you with details of the information we hold about you

We want to make sure all the personal information we hold about you is accurate and up to date. You may ask us to correct or remove information you think is inaccurate.

Changes to our privacy policy

Any changes to our privacy policy in the future will be posted to the website and, where appropriate, through the tenant newsletter. For the avoidance of doubt, it should be noted that our privacy policy is not intended to, and does not create any contractual or other legal rights.

How to contact us

Please contact us if you have any questions about our privacy policy or information we hold about you:

by e-mail to enquiries@ccgwynedd.org.uk

or write to us at: Cartrefi Cymunedol Gwynedd, PO Box 206, Bangor, Gwynedd.
LL57.