



# Privacy Notice

## **We take privacy seriously**

This privacy notice tells you what to expect when Cornwall Rural Housing Association collects your personal information and is referred to in our Data Protection Policy.

## **Data Protection law changed on 25 May 2018**

This notice sets out most of your rights under the new laws. We will update it again as we review the impact of the changes.

Cornwall Rural Housing Association (CRHA) complies with the General Data Protection Regulation (GDPR) 2018 in relation to personal information that you give to us and we will ensure that it is not misused. The Regulation defines a set of rules and guidelines we must follow when handling your information. These are referred to as the General Data Protection principles and are set out below.

Personal information shall be:

- a) processed lawfully, fairly and in a transparent manner in relation to individuals;
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d) accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that personal information that is inaccurate, having regard to the purposes for which it is processed, is erased or rectified without delay;
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal information is processed; personal information may be stored for longer periods insofar as the personal information will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals;
- f) processed in a manner that ensures appropriate security of the personal information, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

### **Who the personal information relates to**

We collect personal information about:

- Residents - This includes current, former and potential residents, who live in our properties, and could also include their family and people associated with them.
- Suppliers - This includes current, former and potential suppliers of goods or services to CRHA.
- Colleagues - This includes current, former and potential colleagues, as well as Board members, apprentices and volunteers.
- Anyone who makes a complaint or enquiry and visitors to our website and offices.

### **How the law protects you**

Your privacy is protected by law. This section explains how that works.

Data Protection law says that we are allowed to use personal information only if we have a proper reason to do so. This includes sharing it outside CRHA. The law says we must have one or more of these reasons:

- To fulfil a contract we have with you, or
- When it is our legal duty, or
- When it is in our legitimate interest, or
- When you consent to it.

A legitimate interest is when we have a business to use your information, but even then it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell you what that is.

## **How we use your personal information**

The personal information you provide us with will be retained only for as long as necessary to fulfil the purposes for which it was collected or as required by law. We do not share personal information with third parties except as necessary to carry out our business or as required by law or other legal processes, and we never sell your personal information or pass it to marketing companies. Personal information collected by us may be transferred to companies where it is necessary to meet the purpose for which it was submitted.

CRHA may record telephone calls made to the organisation for training and monitoring purposes.

## **Sharing your information**

CRHA will generally only disclose your personal information to third parties with your consent. We may sometimes need to share information without your consent to comply with any legal obligation or to fulfil the purposes for which the information was submitted.

CRHA will not transfer your personal information outside of the European Union unless there is adequate protection in place, e.g. membership of the Privacy Shield Scheme.

## **Your rights**

### **Right to data portability**

When processing your personal information to fulfil a contract to which you are a party, you have the right to request electronically held personal information to enable easy transfer to another organisation. Where it is technically feasible you may request that the information be transferred directly between organisations. Once the request is made, the information should be provided to you within 1 month.

### **Right to be forgotten**

You have the right to have the information we hold on you deleted where the use of that information would no longer meet the requirements of the General Data Protection Regulation. Once the request is made, the information must be deleted within 1 month.

Where the information in question has been made public or transferred to a third party, we must also take reasonable steps to inform those third parties about the request for deletion including any links to, or copies of that personal information.

The above does not apply when it is necessary to keep the information in relation to legal proceedings, to comply with a statutory obligation, or to perform tasks in the public interest.

### **Right to rectification**

You have the right to have inaccurate or incomplete information about you rectified and/or completed.

### **Right to object**

In certain circumstances, you have the right to object to your personal information being processed. Depending on the legal basis for processing, this may either be an absolute right (e.g. direct marketing), or may be subject to CRHA being able to demonstrate compelling legitimate grounds which would override your own interests, or where the information is needed for the purposes of legal claims.

### **Right to restriction**

You have the right to request that information is no longer processed (other than it being stored) in particular circumstances, such as when we are dealing with the correction of any inaccurate information; where the processing is unlawful but you object to its erasure; or the information is no longer needed but you require the information to be kept for the purposes of a legal claim.

### **Right to withdraw consent**

You have the right to withdraw consent to us processing your personal information at any time so long as the information is not part of a statutory or contractual requirement or obligation.

We will advise you that complying with such a request may affect the quality of service we can provide to you. One example would be CRHA needing to know the composition of your family so that we can allocate a suitably sized property to you.

You have the right to object to direct marketing from CRHA. This may include post-repair surveys, tenant satisfaction questionnaires, tenant profiling etc. You may withdraw consent at any time by writing to CRHA.

### **How you can see the information we hold about you**

CRHA recognises its responsibility for protecting the privacy of your personal information. You have a legal right to see the personal information we hold about you. This is called a subject access request and by law we have 1 month to respond to you. We will seek to comply with your request but there may be some circumstances where it may not be possible to fully comply with your request, e.g. we may refuse or charge for requests that are manifestly unfounded or excessive. If your request is refused, we will write to you within 1 month to advise, you will then have the right to complain to the supervisory authority and to a judicial remedy.

If you wish to submit a subject access request, please contact the Data Protection Officer.

### **How long does CRHA keep your information?**

We have a document retention policy in place which outlines how long we keep different types of information for. This policy is regularly reviewed based around our legal obligations, our operational requirements and good practice guidance issued by the National Housing Federation.

### **Information we collect via our website**

We collect various types of information from visitors to our website.

We do not pass on any personal information you have given us to any other site. The system will record information if volunteered to us by you, for example on the online forms. This will be treated as confidential.

Our website contains links to other websites. This privacy policy applies only to our site. If you move to another site that collects information you should read their privacy statement.

### **Cookies**

Our website uses cookies to display Google Maps and track visitors via Google Analytics. You can find out more about what this means and how to turn off cookies in your browser by visiting [aboutcookies.org](http://aboutcookies.org)

### **Concerns**

You have the right to complain to the Information Commissioner's Office (ICO) if you think there is a problem with the way in which CRHA is handling your information.

To contact the ICO, please call 0303 123 1113 or visit their website at <https://ico.org.uk/>

### **Contact us**

The role of Data Protection Officer is carried out by the Chief Executive, if you have any questions about the administration of your personal information please contact us on 01208 892000 or at [info@crha.org.uk](mailto:info@crha.org.uk) or at:

Cornwall Rural Housing Association, 19 Callywith Gate, Launceston Road, BODMIN PL31 2RQ

This privacy notice and any future updates will be available at [www.crha.org.uk](http://www.crha.org.uk)

CRHA is a charitable housing association and is a registered society under the Co-operative and Community Benefit Societies Act 2014