

Privacy Notice for Claimants



We believe in being open and transparent with everyone about how we use personal data. You also have a right to be informed offered by the UK General Data Protection Regulations (UK-GDPR) about how your personal data is processed. The information in this Privacy Notice will help you.

We will tell you how we use your personal data and we promise to use it only in connection with processing your claim against us.

Processing your claim

We must collect and keep data about you to process your claim. This data will be shared with other organisations as required to process the claim and respond to fraud.

It may also be necessary to share your personal data under strict conditions of confidentiality with our auditors and we may be compelled to share personal data with organisations that have a legitimate right to it.

The following pages provide more detail.

1. Who is responsible for your personal data?

For the personal data that we collect and use about you, we are the Data Controller. By 'we', we mean The Havebury Housing Partnership which is a charitable registered society under the Co-operative and Community Benefit Societies Act 2014 (7648) regulated by the Regulator of Social Housing (LH4339) and whose registered office is Havebury House, Western Way, Bury St Edmunds, Suffolk, IP33 3SP.

As the Data Controller, we control the way your personal data is collected and the purposes for which your personal data is used.

The Data Protection Officer may be contacted at the above address or by email at **data.protection@havebury.com**

2. Personal data we collect about you

We require a set of data to be provided to us when making a claim, whether this is provided through our Web Form or by email/letter. This data will be used to process your claim and we may need to share this with both third-party organisations (including our insurers and legal representatives) and/or data processors that we work with (including repair contractors) as appropriate for your claim.

We do not carry out automated decision making using your personal data.

For more information on the parties who may share your personal data with us, please see section 7.

Categories of data we collect

Categories	Purpose	Legal basis for processing	Sharing with other organisations
Claimant details, incident details	To process your claim	With explicit consent of the data subject (you)	Insurers, legal representatives and other bodies as appropriate
	To respond to fraud	Necessary for a legal obligation	
Injury details	To process your claim	With explicit consent of the data subject	Insurers, legal representatives and other bodies as appropriate
	To respond to fraud	Legal claims or judicial acts	

3. Retention

It is a principle of the UK-GDPR that personal data is only processed for as long as the purpose requires. We have adopted the National Housing Federation's Data Retention Schedule with some minor changes. Your personal data will be

Categories	Retention limit
Claimants details, incident details and injury details	Unlimited

4. Your rights

You have some rights granted to you by UK General Data Protection Regulations (UK-GDPR) which is referred to in the Data Protection Act 2018.

You have the right to access your personal data at any time. The reason for allowing access is so that you can verify the lawfulness of the processing and to ensure that it is accurate. It will be provided within one month of your request and is free of charge, except where the request is unfounded, excessive or repetitive. We reserve the right in some rare cases not to respond, but we will always explain why.

You have the right to have incorrect or incomplete data rectified. If we have disclosed the personal data to others, we will inform them of the rectification unless this proves impossible or involves disproportionate effort.

You have the right to request erasure of your personal data or object to processing. We will comply if the personal data no longer serves any purposes detailed in this notice. You have the right to refuse processing of your data for marketing purposes.

If you would like to exercise any of your rights of your personal data, please email data.protection@havebury.com.

5. Security of your personal data

We are committed to taking appropriate technical and organisational measures to protect your personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage to personal data.

6. International transfers

Your personal data is stored and processed in the United Kingdom. In some cases, your personal data is stored and processed within the European Union (subject to the EU-UK Trade and Cooperation Agreement).

7. Sharing your personal data

Whilst your personal data may be shared with our subsidiaries from time to time, Havebury will remain the Data Controller responsible for your data.

We will also share personal data with organisations that have a legitimate right to it. In such situations, those organisations will need to demonstrate that they have the legitimate right to your data and they can receive the data in a secure way.

8. Further information

If you have any questions about how your personal data is processed by us or you need any part of this document explaining, please email data.protection@havebury.com

If you have a complaint about how your data is processed by us, you may lodge your complaint with the Supervisory Authority. Write to:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

or call **0303 123 1113** (calls charged at standard rate) or visit their website at ico.org.uk.

About this document

This privacy notice is a controlled document. Once a new version is drafted, it must be approved by the Data Protection Working Group and our Data Protection Officer prior to distribution.

Version	Notes	Author	Date	Approval
22.1	Initial release	PR	14 Jun 2022	DPWG 05 Jul 2022

AADCOP (Age-Appropriate Design Code of Practice) Statement

We reviewed our data processing activities on 21st July 2021 and we have concluded that the activities are not covered by the Age-Appropriate Design Code of Practice. However, in line with the spirit of the Code of Practice and Recital 38 of GDPR ('Children merit specific protection regarding their personal data, as they may be less aware of the risks, consequences and safeguards concerned and their rights in relation to the processing'), we will:

- Ensure that the best interests of children are included in our Data Protection Impact Assessments (DPIAs) where appropriate (e.g., where there may be a chance of children attempting to access services in future), and
- Trigger a review of this Statement of Applicability where a DPIA indicates that we need to re-assess our position on applicability.