



# Privacy Notice for Applicants for Shared Ownership

We believe in being open and transparent with everyone about how we use personal data. The UK General Data Protection Regulations (UK-GDPR) offers you the right to be informed 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 to **identify you, check your eligibility** and **check affordability** for shared ownership accommodation. We will always make sure that we collect and store your personal data securely.

## 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](mailto:data.protection@havebury.com)

## Personal data we collect about you

Personal data is information that relates to you and allows us to identify you, either directly or in combination with other information that we may hold. The following categories of data are being processed:

Categories	Purpose	Legal basis for processing	Sharing with other organisations
Your name, current address, date of birth and contact details	To identify you and contact you	You have made an application with the intent of starting a contract (tenancy agreement) with us	Homes England and Department of Levelling-Up, Housing and Communities
Your ethnic group, gender identity, preferred language and disabilities	To monitor equal opportunities	Havebury has a legal obligation to process this set out in the Equal Opportunities monitoring statute	Homes England and Department of Levelling-Up, Housing and Communities
Your income and expenditure (supported by payslips and bank statements), current property ownership and utility bills	To ensure eligibility for shared ownership and affordability	You have made an application with the intent of starting a contract (tenancy agreement) with us	Homes England and Department of Levelling-Up, Housing and Communities

Categories	Purpose	Legal basis for processing	Sharing with other organisations

You may be asked to provide further personal data from time-to-time in order to process your application and it may occasionally be necessary to share your personal data under strict conditions of confidentiality with auditors. We may also be compelled to share personal data with organisations that have a legitimate right to it.

We process the timing and duration of incoming calls as well as your Caller ID. This may be used to provide management data for business decisions on resourcing, analyse costs and charges for telecoms and to respond to complaints.

Calls are recorded for security and training purposes. We may listen to recordings when there have been complaints that warrant such action or to assist with training our employees.

**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.

**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 retained with the following limits:

Categories	Retention limit
Your name, address and date of birth	Indefinitely
Your contact details	1 year from your tenancy ending*
Your ethnic group, gender identity, preferred language and disabilities	Determined by the storage of this information by other agencies
Your income and expenditure information	2 years from your tenancy starting

\* please note that retention limit will be extended where there are arrears or credits on the account that are unsettled or other outstanding issues where we need to preserve your data

If your application for shared ownership accommodation is unsuccessful, we will typically retain your data for two years.

**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](mailto:data.protection@havebury.com)**.

### **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.

### **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).

### **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.

In addition, we may also share some of your personal data with or obtain your personal data from data processors who work on our behalf under contract. A list of these organisations is available on request.

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.

## 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](mailto: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](http://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
23.1	Changes following review of notices and best practice on readability	PR	27 February 2023	DRAFT

## AADCOP (Age-Appropriate Design Code of Practice) Statement

We reviewed our data processing activities on 21<sup>st</sup> 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.