

CHISLEHURST AND SIDCUP HOUSING ASSOCIATION

WEBSITE PRIVACY POLICY

1.0 INTRODUCTION

- 1.1 The General Data Protection Regulation (GDPR) is the principal regulation, which makes provision for the regulation of the processing of information relating to individuals, including the obtaining, holding, use or disclosure of such information. In accordance with the General Data Protection Regulation, the Association has put in place this Website Privacy Policy.
- 1.2 Chislehurst and Sidcup Housing Association (the Association) is a Registered Provider and is regulated by Homes England. We provide social housing and support to individuals. The Association is the controller of information and decides the manner and purpose of how personal information is processed. The appointed Data Protection Officer for the Association is the Chief Executive and can be contacted at csinfo@csha.org.uk, alternatively on 0208 467 9146.
- 1.3 The Association processes personal information from you when you register with us or contact us; or if you provide a service on our behalf. Processing of information means any information that we collect, edit, retain and store, disclose or share, delete/erase and destroy.
- 1.4 Personal information relates to a living individual who can be identified, contacted or located by the information alone or together with other information. Examples of personal information include name, address, dates of birth, bank details. Personal information may be stored electronically (including CCTV images) or as part of the Association's manual records. If we process personal information about you, you are known as a Data Subject.
- 1.5 The Association may also process sensitive personal information. As the information is sensitive we will seek your consent to processing this type of information. It will depend on the relationship we have with you whether or not we process sensitive personal information. Examples of sensitive information include:-
- Racial or ethnic origin
 - Political opinions
 - Religious or philosophical beliefs
 - Trade union membership
 - Physical/mental health or condition
 - Sexual life or sexual orientation

- Genetic data
- Biometric data
- Commission or allegation of an offence
- Proceedings for any offence, disposal of proceedings or sentence

2.0 PURPOSE

2.1 The purpose of this policy is to explain to Data Subjects, who visit the Association's website, how we as an organisation will treat their personal information and to demonstrate our commitment to safeguarding their privacy. Data Subjects are Tenants, ex Tenants, Contractors, Consultants, Suppliers, Staff, Board Members and relatives of Tenants).

3.0 WHAT INFORMATION WILL BE COLLECTED

3.1 We may collect, store and use the following types of personal information:-

- Information about the computer being used and about visits to and use of our website. This will include IP address, geographical location, browser type, referral source, length of visit and number of page views.
- Information that the website visitor provides to the Association for the purpose of registering with us, including name, address, email address, telephone number
- Any other information that the website visitor chooses to send to the Association.

3.2 We use Google Analytics to analyse the use of our website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated relating to our website is used to create reports about the use of the website. Cookies are used to give the best experience on our website. If a user continues without changing their settings, the Association will assume they are content to receive cookies. Cookie settings can be changed by the user at any time. Google will store this information. Google's privacy policy is available at www.google.co.uk/intl/en/policies/privacy

4.0 USE OF PERSONAL INFORMATION

4.1 Personal information will also be used for the following purposes:-

- To enable the use of the services available on the website.
- To send general (non-marketing) communications.
- To send notifications, our newsletter and other marketing communications relating to our business which we think may be of

interest to you, which you have specifically agreed to or requested, by email or similar technology. Website visitors can inform the Association at any time if they no longer require communication or marketing information by this method.

- To provide third parties with statistical information about the website use, but this information will not be used to identify any individual user.
- To deal with enquiries or complaints made by website visitors relating to the website.

4.2 If at any time personal information is submitted for publication on the Association's website, it will be published and used in accordance with the permission granted by the user. The Association will not, without users express consent, provide any personal information to third parties for the purpose of direct marketing.

5.0 CONSENT

5.1 In some situations, there may a number of legal grounds open to the Association with regard to the processing of your personal information. This may or may not include consent. However, in order to maintain the best possible relationship of trust, consent will be sought as 'good practice' wherever this is appropriate and possible. We will always seek your consent if we process sensitive personal information about you. If we require your consent to process information we will:-

- Ensure your consent is given freely
- We will be specific as to why we require your consent
- We will inform you of the reasons why we require consent
- We will be clear about how we gain your consent including use of plain language and will always obtain a positive indication of your agreement rather than using tick boxes

5.2 Whenever the Association is collecting sensitive personal information, this will, require explicit consent. However you have the right to withdraw consent at any time, where relevant and in accordance with the provisions set out in the General Data Protection Regulations.

6.0 DISCLOSURE

6.1 The Association may disclose information regarding website visitors to any of its Employees, Officers, Suppliers or Contractors, so far as it is reasonably necessary for the purposes set out in the Association's Privacy Notice and Privacy Policy.

6.2 In addition the Association may disclose information as follows:-

- To the extent that the Association is required to do so by law.
- In connection with any legal proceedings or prospective legal proceedings.
- In order to establish, exercise or defend the Association's legal rights, including providing information to others for the purpose of preventing and detecting fraud. This includes data matching exercises in conjunction with the Cabinet Office, the requirements of money laundering regulations and reducing credit risk.

6.3 Except as provided in this Website Privacy Policy the Association will not provide website visitors' information to third parties.

7.0 SECURITY OF PERSONAL INFORMATION

7.1 The Association will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of personal information. Personal information will be stored on secure servers managed by Chislehurst and Sidcup Housing Association and its associates and suppliers.

8.0 YOUR RIGHTS AS A DATA SUBJECT

8.1 **The right to be informed** - Through the provision of privacy notices, we will be open and transparent about how and why we use your personal information.

8.2 **The right of access** - You have a right to ask us what personal information we hold about you and to request a copy of your information. This is known as a 'subject access request' (SAR). Subject Access Requests must be made in writing, we have a subject access form you can use for this purpose. Written requests must be accompanied by proof of your address and identify.

If you are seeking to obtain specific information about a particular matter or from a particular time period, it helps if you clarify the details of what you would like to receive in your written request. If someone is requesting information on your behalf they will need written confirmation from you to evidence your consent for us to release this and proof of identity (both yours and theirs).

We have one month within which to provide you with the information you have asked for. However, we will be able to extend the period of compliance by a further two months where requests are complex or numerous. If this is the case, we will inform you within one month of the receipt of the request and explain why the extension is necessary.

8.3 **The right to rectification** - You can ask us to rectify your personal data if it is inaccurate or incomplete. Please help us to keep our records accurate by keeping us informed if your details change. We will must respond within one

month. This can be extended by two months where the request for rectification is complex.

- 8.4 **The right to erasure** - The right to erasure is also known as 'the right to be forgotten'. In some circumstances, you can ask us to delete or remove personal information, where there is no compelling reason for its continued processing. This is not an absolute right, and we will need to consider the circumstances of any such request and balance this against our need to continue processing the information. Our response will also be guided by the provisions of our Document Retention Policy and the General Data Protection Regulation.
- 8.5 **The right to restrict processing** - In some circumstances you can ask us to restrict processing, for example:-
- If you disagree with the accuracy of personal information.
 - If we are processing your information on the grounds of legitimate interests (as detailed earlier), and whilst we consider whether our legitimate grounds override those of yours.
 - When processing is unlawful and you are against erasing the information and requests a restriction on the processing of information instead.
 - If we no longer need the personal information but you require the information to establish, exercise or defend a legal claim.
- 8.6 **The right to data portability** - This allows you to obtain and reuse your personal information for your own purposes across different services. It allows you to move, copy or transfer personal information we hold about you across different services, you may be able to ask us to do this.
- 8.7 **The right to object** - You can tell us if you object to our processing of your personal information, based on legitimate interests or for the purpose of direct marketing, including profiling.
- 8.8 **Rights in relation to automated decision making and profiling** - You can ask us to review any decisions that are determined by automated means. You can also object to our use of your personal information for profiling.
- 8.9 For further information on exercising these rights and what these rights mean, data subjects should contact the Data Protection Officer at csinfo@csha.org.uk, or on 0208 467 9146

9.0 SUBJECT ACCESS REQUESTS

- 9.1 A copy of the information should be provided free of charge. However, the Association reserves the right to charge a 'reasonable fee' when a request is manifestly unfounded or excessive, particularly if it is repetitive.

- 9.2 The Association may also charge a reasonable fee to comply with requests for further copies of the same information. The fee will be based on the administrative cost of providing the information.
- 9.3 Information will be provided without delay and at the latest within one month of receipt of the request. Where requests are complex or numerous the Association may extend the period of compliance by a further two months. If this is the case, the Association will contact the individual within one month of the receipt of the request and explain why the extension is necessary. The Association will take reasonable steps to ensure that the person asking for information regarding the data held on them is the person that the data belongs to.

10.0 THIRD PARTY WEBSITES

- 10.1 Chislehurst and Sidcup Housing Association is not responsible for the privacy policies or practices of third party websites which may be accessed through links on our website.

11.0 REVIEW OF THIS POLICY

- 11.1 This policy will be reviewed every three years and or in relation to good practice legislation or regulatory guidance.