

Privacy notice and data protection statement

We are committed to protecting the personal information we collect about you. This privacy notice explains what happens to the information we collect for the purposes of lettings and allocations and housing management.

The Data Protection Act 1998 (and incoming General Data Protection Regulation from May 2018) and other laws apply to our use of anyone's personal information and everyone has rights regarding how their personal information is handled. Dolphin Square Charitable Foundation is the registered data controller (registration number ZA155775) for the purposes of the Data Protection Act 1998. For the purposes of this statement, Dolphin Square Charitable Foundation and its subsidiaries are collectively known as Dolphin Living.

This privacy notice describes the current policies and practices of Dolphin Living with regard to personal data collected by us from you directly and/ or through www.dolphinliving.com.

Information we may collect from you:

- 1) When you first make an application to us for housing:
 - Your name and contact details for use across the organisation and by our housing management providers and partner organisations such as Westminster Homeownership.
 - Detailed personal information, such as age, sex, date of birth, ethnicity, income, National Insurance number, private expenditure data, employment status, name, contact details (telephone numbers and email addresses), gender, gender identify, relationship status, any disabilities, access to financial services such as banks and credit unions, bank details, benefits, council tax, details of those who you want us to communicate with on your behalf, how you prefer us to contact you, whether you have any literacy problems, your ability to speak English and language preferences.
 - Medical information so that we can prioritise and assess a housing application
- 2) Information required to manage your tenancy and contact you about your housing
 - Details relating to the repair and maintenance of your home
 - Feedback from our contractors, about their appointments with you
- 3) To provide security
 - We operate a CCTV system, which collects images and is used in accordance with CCTV policies and procedures.
- 4) For providing our housing services to you through our managing agent, Touchstone
 - Meeting your housing management needs and requirements
 - Managing payments from you, to you and for accounting purposes
 - Meeting our legal obligations including the requirements of our funders or regulators
 - To resolve complaints and queries

There may be times when we disclose your details to others, as follows:

- Our staff, advocacy partners, contractors and suppliers who provide services to you, or who provide services on our behalf. Where required we will ensure that we have appropriate information sharing protocols in place.
- Housing contractors for example, to undertake repairs or improvements to your home as instructed by our managing agent Touchstone.

- Our contractors who handle our out-of-hours service calls for us
- Local authorities, other housing and support organisations and statutory agencies
- Our solicitors
- Our insurers, in case of public liability claims and similar
- Credit reference agencies for rental tenants
- Debt collection agencies to collect current and former debit
- Utility companies
- Debt collection agencies acting for others and on our behalf
- Carrying out related research

In some cases we may have a duty to disclose your information by law to:

- Our partner organisations who purposes are compatible with ours
- Other housing associations or charities
- Local authorities, regulators and government departments
- Police, fire services, health services or medical staff

Data integrity and security

We strive to maintain the reliability, accuracy, completeness and currency of personal data in our databases and to protect the privacy and security of our databases. We keep your personal data only for as long as reasonably necessary for the purposes for which it was collected.

Our servers and our databases are protected by industry standard security technology, such as password protection.

The employees who have access to personal data have been trained to handle such data properly and in accordance with latest regulation. Although we cannot guarantee against any loss, misuse, unauthorised disclosure, alteration or destruction of data, we try to prevent such unfortunate occurrences.

We do not give anyone access to your information in return for payment for their marketing or commercial purposes, unless you give specific consent.

Data access and corrections

Under section 7 of the Data Protection Act you have right to request a copy of the information that we hold about you.

We do not always make a charge for this; however, we do reserve the right to make a charge of no more than £10 for more complex cases.

You have a legal right to request information that we hold about you and we have a duty to respond within 40 days. The 40-day period begins when we receive proof of identity. (In May 2018, the response time period will reduce to 30 days in line with the General Data Protection Regulation). To request information please complete and return the Subject Access Request (SAR) form marked for the attention of Head of Corporate Services, 4th Floor, 11 Belgrave Road London SW1V 1RB. Upon receipt of your request and enough information to permit us to identify your personal data we will disclose the personal data we hold about you.

Changes to this privacy notice

This statement will be reviewed regularly and may change. We will display the new statement on our website.