

## 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, housing management and applying for a job.

The Data Protection Act 2018, the General Data Protection Regulation 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 General Data Protection Regulation (and Data Protection Act 2018). 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](http://www.dolphinliving.com), <https://www.homeownershipwestminster.co.uk/>, or other Local Council website.

We collect and process personal information about you for the following purposes:

- Providing affordable housing
- Administering housing and property
- Carrying our related research
- Information in relation to diversity – this information supports our compliance with the Equality Act 2010
- Information which supports us in safeguarding the health and safety of our employees
- In order to comply with any other legal obligations
- We will only collect that information that we need to deliver services to you and to meet our legal obligations

### What does Dolphin Living collect from users of the Site?

Dolphin Living may collect the following personal data ("User Data") from you when you use our online services:

- information you provide by filling in forms on our Site. This includes information provided when making enquiries via the Site;
- information you provide when you report a problem with our Site;
- if you contact us, we may keep a record of that correspondence; and
- details of your visits to our Site and the resources that you access.

(Dolphin Living may also collect User Data that you provide to us when you visit our premises or call the office).

## What information will Dolphin Living 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

## What does Dolphin Living make of User Data?

Dolphin Living will use the User Data that it collects from you for the following purposes:

- providing you with our services;
- dealing with your enquiries and requests;
- administering your account;
- statistical monitoring for marketing purposes and/ or to improve or tailor the services we provide; and
- providing you with information and offers from us that we believe you may find useful or interesting.
- Applying for a job at Dolphin Living.

## Disclosure

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 Processing**

We regularly review why the purpose of data processing to ensure that there is a valid justification for doing so. We are required to have one or more lawful grounds to process your personal data. Only 4 of these are relevant to us: consent, contractual relationships, legal obligations or legitimate interests. For the majority we use your personal information to assess your housing application, manage our contract with you and provide housing services to you. You will not be able to opt out of providing this type of information.

We also process some of your data because it is in our legitimate interests to do so. You can object to this processing if you think that your legitimate interests outweighs ours.

We consider that we have legitimate interest to make sure that:

- Our services/ properties meet the needs of our customers;
- We can contact residents in the event of emergencies and to carry out essential repairs
- We communicate with residents to meet our business objectives and help build communities
- We have effective procedures for preventing, and managing, outstanding debt resulting from unpaid rents;
- We make the most efficient use of our resources and we understand how we are performing; and
- We understand our residents' experiences and views so that we can effectively influence and contribute to debates on future housing strategies.

### **Do we process sensitive personal information?**

Applicable law recognises certain categories of personal information as sensitive and therefore requiring more protection, including health information, ethnicity and political opinions. In limited cases, we may collect sensitive personal data about you. We would only collect sensitive personal data if there is a clear reason for doing so; and will only do so with your explicit consent.

### **Children's data**

We do not usually gather information directly from children as part of our core landlord service. We may process information relating to children in our households where it has

been provided to use during our relationship with you. In such cases, we process that information based on our legitimate interests and to fulfil our legal and regulatory obligations.

### **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 enhanced firewall system and 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, corrections and erasure**

Where we rely on consent to use your personal information, you have the right to withdraw that consent at any time. This includes the right to ask us to be unsubscribed from our email list for Dolphin Living properties. You also have the following rights:

- 1) Right to be informed – you have the right to be told how your personal data will be used. The Data protection policy and privacy statement on our website and in our communications, are intended to provide you with a clear and transparent description of how your personal information may be used.
- 2) Right of access - You have a legal right to request information that we hold about you and we have a duty to respond within 30 days. The 30-day period begins when we receive proof of identity. To request information please complete and return the Subject Access Request (SAR) form marked for the attention of Operations and Compliance Director, 4<sup>th</sup> 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.
- 3) Right to erasure – you can ask us to delete your personal information where it is no longer necessary for us to use it, where you have withdrawn consent (if we process based on consent), or where we have no lawful basis for keeping it.
- 4) Right of rectification – if you believe our records of your personal information are inaccurate or incomplete, you have the right to ask for those records to be updated.
- 5) Right to restrict processing – you have the right to ask for processing of your personal data to be restricted if there is a disagreement about its accuracy or legitimate usage.
- 6) Right to portability – You can ask us to provide you, or a third party (if possible), with some of the personal data we hold about you in a structured, commonly used, electronic form, so that it can be easily transferred.

To exercise these rights, please send a description of personal information in question using the address provided above.

### **Data Retention**

Please read our Data protection policy to review our retention periods for personal information. We review our retention periods on a regular basis.

### **Changes to this privacy notice**

This statement will be reviewed regularly and may change. We will display the new statement on our website. By using our website, you are agreeing to be bound by this notice.

The provision of your personal data to us is voluntary. However, without providing us with your personal data, you may be unable to (as appropriate) take an action like submit interest for one of Dolphin Living's properties.

For more information we suggest consulting the [Information Commissioner's Office \(ICO\) website](#).

### **Third party websites**

We link our website directly to other sites. This Privacy notice does not cover external websites and we are not responsible for the privacy practices or content of those sites. We encourage you to read the privacy policies of any external websites you visit via links on our website.