

## Stonewater Group

### Privacy Policy

#### Introduction

Welcome to our privacy policy.

Please note that this privacy policy relates to the activities of:

1. Stonewater Limited, Charitable Registered Societies No. 20558R (**Stonewater**);
2. Stonewater (2) Limited, Charitable Registered Societies No. 19412R (**Stonewater 2**);
3. Stonewater (5) Limited, Charitable Registered Societies No. 1527R (**Stonewater 5**);
4. Stonewater Commercial Limited, registered in England & Wales, CRN 4750737;
5. Stonewater Developments Limited, registered in England & Wales, CRN 11414209;
6. Stonewater Funding PLC, registered in England & Wales, CRN 8190978; and
7. Stonewater Procurement Limited, registered in England & Wales, CRN 7422241,

(collectively referred to as the "**Stonewater Group**", "**we**", "**us**" or "**our**" in this privacy policy). Please also note that 'Stonewater' and 'Stonewater Homes' are trading names of Stonewater, Stonewater 2 and Stonewater 5.

The Stonewater Group respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website(s) (regardless of where you visit them from) and tell you about your privacy rights and how the law protects you.

Please also use the Glossary to understand the meaning of some of the terms used in this privacy policy.

By using this website, you signify your acceptance of this policy. If you do not agree to this policy, please do not use our website(s). Your continued use of the website(s) following the posting of changes to this policy will be deemed your acceptance of those changes.

## 1. Important information and who we are

### Purpose of this privacy policy

This privacy policy aims to give you information on how the Stonewater Group collects and processes your personal data through:

- a. your use of this website, including any data you may provide through this website when you enquire about our services and access of the Customer Hubb;
- b. provision of housing to you as an existing customer;
- c. applying for supported housing or a Stonewater Group home;
- d. applying to be a board or committee member; and/or
- e. applying for a position at the Stonewater Group.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

### Controller

This privacy policy is issued on behalf of the Stonewater Group so when we mention Stonewater Group, "**we**", "**us**" or "**our**" in this privacy policy, we are referring to the relevant company in the Stonewater Group responsible for processing your data.

We will let you know which entity will be the controller for your data when you purchase a product or service with us. Stonewater is generally the controller in respect of all data and is the controller and responsible for this website. Other companies in the Stonewater Group generally process data held by Stonewater as controller.

We have appointed a data protection officer (**DPO**) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us using the details set out below.

## Who is the Stonewater Group and how to get in touch?

If you have any questions about this privacy policy or our privacy practices, please contact our DPO in the following ways:

### Stonewater Group

Full name of legal entity: Stonewater Limited, Charitable Registered Societies No. 20558R

Email address: [data.protection@stonewater.org](mailto:data.protection@stonewater.org)

Stonewater Group customers: 01202 319 119

Other website visitors: 01234 889 494

Postal address: Stonewater Limited, Suite C, Lancaster House, Grange Business Park, Enderby Road, Whetstone, Leicester, LE8 6EP

You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)) and/or to the Housing Ombudsman Service (**HOS**), the UK supervisory authority for housing organisations registered with them (<http://www.housing-ombudsman.org.uk/>). We would, however, appreciate the chance to deal with your concerns before you approach the ICO and HOS so please contact us and our customer service teams in the first instance.

## Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated in September 2021. Historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## 2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- in respect of the **Stonewater Group** in general:
  - **Identity Data** includes first name, maiden name, last name and health conditions (if applicable and you want to disclose this information);
  - **Profile Data** includes your personal and professional interests, contact preferences, and experience of our services including feedback and survey responses;
  - **Usage Data** includes information about how you use our website and services, for example inputting details to utilise features on the site; and
  - **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences;
  - **Contact Data** includes email address and telephone/mobile numbers; and
  - **Technical Data** includes the type of device you have used to access the site (including the make, model, operating system, internet protocol (IP) address and browser type, your login data and version, time zone setting and location, browser plug-in types and versions, full Uniform Resource Locators (URL), clickstream to, through and from our site, information you viewed or searched for, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number;
- in respect of **tenants** and **potential housing applicants** (including all individuals whom will be living with you – the consent of which we will assume that you have previously sought prior to sharing their Personal Data):
  - **Identity Data** includes copies of your identification documents, first name, maiden name, last name, previous name(s), title, date of birth, National Insurance number, proof of housing eligibility, any interest or equity in other property, medical details (allergies, health conditions, disabilities, or vulnerabilities), and immigration status;
  - **Profile Data** includes any third parties who you are involved with (including those offering support and services), property history (including any previous

tenancies with the Stonewater Group, rent arrears and/or legal action in relation to your tenancy), any correspondence with or about you, your tenancy and the conduct and behaviour of those that live at the property, any complaints made by or against you, any correspondence we have at your request with third parties, and your interests, preferences, feedback and survey responses;

- **Contact Data** includes email address(es), telephone number(s), previous landlord details, and your referees (including probation officers, social workers and/or local authorities); and
- **Financial Data** includes your household income, bank details (if you pay your rent by direct debit), rent statements, rent payment records and information provided by our credit reference agencies;
- in respect of **supported housing tenants** and **potential supported housing applicants** (including all individuals whom will be living with you – the consent of which we will assume that you have previously sought prior to sharing their Personal Data):
  - **Identity Data** includes copies of your identification documents, first name, maiden name, last name, previous name(s), title, date of birth, National Insurance number, proof of housing eligibility, any interest or equity in other property, medical details (allergies, health conditions, disabilities, or vulnerabilities), immigration status, an image of you, your household or visitors, emergency contacts;
  - **Profile Data** includes any third parties who you are involved with (including those offering support and services), property history (including any previous tenancies with the Stonewater Group, rent arrears and/or legal action in relation to your tenancy), any correspondence with or about you, your tenancy and the conduct and behaviour of those that live at the property, any complaints made by or against you, any correspondence we have at your request with third parties, your interests, preferences, feedback and survey responses, information in relation to your personal life and your support requirements (if applicable), details about your emotional and physical well-being, details of your contacts and interactions with our staff, contractors and volunteers, information provided by agencies, such as Social Services, Mental Health Teams, and your referees, correspondence regarding support and housing needs and risk management, details of any complaints made by or against you and your visitors and public safety risks;
  - **Contact Data** includes email address(es), telephone number(s), previous landlord details, and your referees (including probation officers, social workers and/or local authorities);

- **Financial Data** includes your household income, bank details (if you pay your rent by direct debit), rent statements, rent payment records and information provided by our credit reference agencies;
- in respect of **board and committee members**:
  - **Identity Data** includes first name, maiden name, last name, previous name(s), title, criminal convictions and details about your experience and expertise in relation to the role you are applying for, and information by two referees provided by you to understand your suitability for the role. If appointed we also ask you to provide information to confirm you are a 'fit and proper person', in the form of a model declaration provided by HMRC, for example this includes information about whether you are disqualified as acting as a charity trustee; whether you have been convicted of an offence involving deception or dishonesty; or whether you have been involved in tax fraud or avoidance schemes. We regularly ask you to confirm whether you have a close connection with a Stonewater Group board member, employee or supplier; and
  - **Contact Data** includes email address(es), telephone number(s) and address;
- in respect of the **Customer Hubb**:
  - **Profile Data** includes your username and password;
  - **Contact Data** includes email address(es), house number and postcode; and
- In respect of the **MyHome app**:
  - **Profile Data** includes your username and password; and
- in respect of the **job applicants**:
  - **Identity Data** includes first name, maiden name, last name, entitlement to work in the UK and address;
  - **Contact Data** includes email address and telephone numbers;
  - **Profile Data** includes your personal and professional interests, criminal convictions, contact preferences, information from interviews and phone-screenings you may have, and experience of our services including feedback and survey responses;
  - **Usage Data** includes information about how you use our website and services, for example inputting details of your transactions to utilise features on the site; and
  - **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences; and

- **Financial Data** includes current level of remuneration and benefit entitlements.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing interested in particular services. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We will collect **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health (including conditions, disabilities and/or vulnerabilities), and genetic and biometric data). We also use sensitive personal information to ensure that we are complying with our obligations under the Equality Act 2010.

We may also collect further personal data including previous complaints about anti-social behaviour and your criminal record (including on-going criminal or civil proceedings) from your references (including social workers, probation officers and/or local authorities). Where the safety of our staff is believed to be at risk, usually where a customer has threatened staff, or contractors working on our behalf, we may record this information on your record so that risks to our staff are minimised.

### **Children's personal data**

We do not normally process children's information as part of a tenancy, as all tenants are adults. However, we record children's basic information if they are resident in one of our properties, including their name and date of birth. This is required for checking the property is not overcrowded and to assess other tenancy management issues where all householders and ages are required to be known.

We may receive children's information if we are involved in the housing and tenancy aspects of a welfare case as part of a multi-agency working solution.

We undertake DBS checks on all staff who work with young and/or vulnerable people.

### **During the recruitment process**

We collect the above highlighted information in a variety of ways. For example, data might be contained in application forms or CVs, obtained from your passport or other identity documents, or collected through interviews or other methods of assessment. As part of the recruitment process, Stonewater uses Blue Octopus, an online application, to process personal data on our behalf. Where you apply for a job opening posted by Stonewater, Blue Octopus' privacy notice provisions will apply to our processing of your personal information in addition to our other privacy notices which are available on our website.



Where you apply for a job opening via a job site or similar online service provider, you should note that the relevant party may retain your personal data. Any use by the third party of your data will be in accordance with the third party's privacy notice.

We may also collect personal data about you from third parties, such as references supplied by former employers. We will seek information from third parties only when a job offer has been made to you.

Any data collected will be stored in a range of different places, including on your application record, the Blue Octopus Applicant Tracking system, in the Stonewater HR management systems and our email system. We will only use your data for the recruitment process of which you are a part and for storage in a talent pool. Such processing is carried out exclusively for the purpose of consideration of your application for present or future job vacancies, including the possibility of contacting you, where necessary, for this purpose.

Your information may be shared internally within Stonewater Group for the purposes of the recruitment process. This includes members of the People team, interviewers involved in the recruitment process, and managers in the business area with a vacancy.

As set out above, we pass your information to our third-party service provider, Blue Octopus, who shall process your information only in accordance with our instructions and as otherwise required by law. We will not share your data with other third parties unless your application for employment is successful and an offer of employment is made. We will then share your data with former employers in order to obtain references.

### **Board and committee and panel members**

Personal data is used in respect of Financial Conduct Authority and Companies House returns for relevant companies in the Stonewater Group. This relates to both non-executive directors and executive directors in each company in the Stonewater Group where you respectively serve as a director or member of the board.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.



### 3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity and Contact Data by filling in forms, participating in an online video conference/call or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for our housing, products or services;
  - create an account on our website;
  - subscribe to our services or publications;
  - request marketing to be sent to you;
  - enter a promotion or survey; or
  - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy <https://www.stonewater.org/about-us/privacy-notice/cookies-used-by-this-website/> for further details.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:
  - Technical Data from the following parties:
    - analytics providers;
    - advertising networks based; and
    - search information providers.
  - Identity and Contact Data from data brokers or aggregators and publicly available sources such as Companies House and the Electoral Register based inside the EU.

### 4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- where we need to perform the contract we are about to enter into or have entered into with you;
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- where we need to comply with a legal obligation;
- if you are a new supplier;

- where it is necessary to add you to our system to enable purchase orders and payments to be made;
- where you are providing information as part of a new supplier procurement process this information is part of the selection process;
- where we need to ensure that your business is financially viable, we may conduct checks via Experian.

If you choose to send us an email via the website, we simply collect your name, email address, phone number and the nature of your enquiry. This allows us to respond to your query quickly and efficiently. Once we have responded, and assuming your query is dealt with, we shall either delete this data after 6 months or transfer and process any personal data collected to our contact relationship management database. Our contact management database is used to manage our customer relationships effectively and such information shall always be retained in accordance with our retention policy (please see below).

Please go to the Glossary to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

**Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<b>Stonewater Group</b>		
<b>In respect of Tenants and housing applicants for supported housing or otherwise:</b>		
To progress and consider your application for Stonewater housing.	(a) Identity (b) Contact (c) Profile (d) Financial (e) Marketing and	(a) Performance of the services for you  (b) Necessary to comply with a legal obligation  (c) Necessary for our legitimate interests (to progress your

	Communications	application)
To ensure the safety of those within our neighbourhoods and communities and to tackle crime and anti-social behaviour.	(a) Identity (b) Contact (c) Profile	(a) Necessary to comply with a legal obligation  (b) Necessary for our legitimate interests (to maintain a safe neighbourhood)
To tackle fraud and prevent crime.	(a) Identity (b) Contact (c) Profile	(a) Performance of the services for you  (b) Necessary to comply with a legal obligation  (c) Necessary for our legitimate interests (to tackle fraud and prevent crime)
To comply with your tenancy agreement.	(a) Identity (b) Contact (c) Profile	(a) Performance of the services for you  (b) Necessary to comply with a legal obligation  (c) Necessary for our legitimate interests (to comply with our contractual obligations)
To ensure you receive the most appropriate form of housing for your needs.	(a) Identity (b) Contact	(a) Performance of the services for you  (b) Necessary to comply with a legal obligation  (c) Necessary for our legitimate interests (to provide appropriate services)
To monitor our equality and diversity compliance, although we will never use this information to make decisions about you.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Necessary to comply with a legal obligation  (b) Necessary for our legitimate interests (to ensure we are fair and equal)
To conduct research and statistical analysis to improve our business processes and the services offered to our customers.	(a) Profile (b) Usage (c) Marketing and Communications	(a) Performance of the services for you  (b) Necessary for our legitimate interests (to improve our service offering)

To evaluate our performance against other bench marks.	(a) Profile (b) Financial (c) Marketing and Communications	(a) Performance of the services for you (b) Necessary for our legitimate interests (to evaluate our performance)
To share information with authorised contractors to provide landlord services, for example repairs.	(a) Identity (b) Contact (c) Profile (d) Financial	(a) Performance of the services for you (b) Necessary for our legitimate interests (to provide landlord services)
To ensure that you are acting within the law, and for local or government authorities to provide you with relevant assistance where appropriate.	(a) Identity (b) Contact (c) Profile (d) Usage	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (to monitor lawful activities)
To respond to any queries or complaints made by you or members of your household and to deal with requests such as repairs and maintenance of your property.	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of the services for you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to respond to queries)
To undertake credit reference agencies to enable them to assist other organisations to assess your financial standing if you apply for products and services.	(a) Identity (b) Contact (c) Profile (d) Financial	(a) Performance of the services for you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to conduct credit checks)
To conduct surveys relating to our services in order to assess satisfaction and make improvements based on customer feedback.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	(a) Performance of the services for you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to conduct surveys)
To determine your reward level under our reward scheme.	(a) Identity (b) Contact (c) Profile	(a) Performance of the services for you (b) Necessary to comply with a

	(d) Usage (e) Financial	legal obligation  (c) Necessary for our legitimate interests (to determine your reward level)
To arrange a viewing.	(a) Identity (b) Contact	(a) Performance of the services for you
To provide updates about our new homes and developments, sites, homes or events you might be interested in.	(a) Identity (b) Contact (c) Marketing and Communications	(a) Performance of the services for you
To assess demand for specific areas or property types.	(a) Identity (b) Contact (c) Financial	(a) Performance of the services for you
To enter into our tenancy or contract with you.	(a) Identity (b) Contact (c) Transaction	(a) Performance of the services for you  (b) Necessary to comply with a legal obligation
To ensure our services/properties meet the needs of our customers.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of the services for you  (b) Necessary to comply with a legal obligation  (c) Necessary for our legitimate interests (to monitor our service offering)
To ensure we can contact tenants in the event of emergencies and to carry out essential repairs.	(a) Identity (b) Contact	(a) Performance of the services for you  (b) Necessary to comply with a legal obligation  (c) Necessary for our legitimate interests (to make contact in the event of an emergency)
To allow us to communicate with tenants' to meet our business objectives, encourage social inclusion	(a) Identity (b) Contact (c) Profile	(a) Performance of the services for you

and help build communities.	(d) Marketing and Communications	
To support safer communities through our work with the police and local authorities.	(a) Identity (b) Contact (c) Profile	(a) Performance of the services for you  (b) Necessary to comply with a legal obligation
To ensure we have effective procedures for preventing, and managing, outstanding debt resulting from unpaid rents.	(a) Financial (b) Contact	(a) Performance of the services for you  (b) Necessary to comply with a legal obligation  (c) Necessary for our legitimate interests (to manage rents)
To make the most efficient use of our resources and we understand how we are performing.	(a) Profile (b) Usage (c) Financial (d) Marketing and Communications	(a) Performance of the services for you  (b) Necessary for our legitimate interests (to improve our service offering)
To understand our tenants' experiences and views so that we can effectively influence and contribute to debates on future housing strategies.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Financial (f) Marketing and Communications	(a) Performance of the services for you  (b) Necessary for our legitimate interests (to study how members use our products/services, to develop them and grow our business)
<b>In respect of supported housing tenants and corresponding applicants:</b>		
To progress and consider your application at your request, to tackle fraud and to comply with the obligations and rights in your tenancy agreement.	(a) Identity (b) Contact (c) Profile (d) Financial	(a) Performance of the services for you  (b) Necessary to comply with a legal obligation
To ensure that you receive the most appropriate form of housing for your needs (including support from us and other support services including statutory agencies).	(a) Identity (b) Contact (c) Profile	(a) Performance of the services for you  (b) Necessary to comply with a legal obligation  (c) Necessary for our legitimate

		interests (to ensure you receive the most appropriate service from us)
To effectively manage your safety and that of our staff, contractors and other clients.	(a) Identity (b) Contact (c) Profile	(a) Performance of the services for you  (b) Necessary to comply with a legal obligation
To provide landlord services, for example repairs, and temporary / supported accommodation services.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Financial	(a) Performance of the services for you  (b) Necessary to comply with a legal obligation
To ensure that you are acting within the law, and for local authorities and agencies to provide you with relevant assistance where appropriate.	(a) Identity (b) Contact (c) Profile	(a) Performance of the services for you  (b) Necessary to comply with a legal obligation
To ensure the safety of those within our neighbourhoods and communities and to tackle crime and anti-social behaviour.	(a) Identity (b) Contact (c) Profile	(a) Necessary for our legitimate interests (to maintain a safe neighbourhood)
To respond to any queries or complaints made by you or members of your household and to deal with requests such as repairs and maintenance of your property	(a) Identity (b) Contact	(a) Performance of the services for you  (b) Necessary to comply with a legal obligation
To keep some information about you for Equality and Diversity monitoring purposes, although we will never use this information to make decisions about you.	(a) Identity (b) Contact (c) Profile	(a) Performance of the services for you  (b) Necessary to comply with a legal obligation
To assist credit agencies and other organisations to assess your financial standing if you apply for products and services.	(a) Identity (b) Contact (c) Profile (d) Usage	(a) Performance of the services for you  (b) Necessary to comply with a legal obligation  (c) Necessary for our legitimate



	(e) Financial	interests (to conduct credit checks)
To conduct research and statistical analysis to help improve the services offered to customers and our internal business processes, as well as to evaluate our performance. Where possible, statistical information is anonymised or pseudonymised.	(a) Identity (b) Contact (c) Profile (d) Usage	(a) Performance of the services for you  (b) Necessary for our legitimate interests (to study how members use our products/services, to develop them and grow our business)
To conduct surveys relating to our services in order to assess satisfaction and make improvements based on customer feedback.	(a) Identity (b) Contact (c) Profile	(a) Performance of the services for you  (c) Necessary for our legitimate interests (to conduct surveys)
To manage your account charges and payments, including arrears.	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) The processing is necessary for the performance of our tenancy (or contract) with you. We use this basis for all processing concerning the managing of your tenancy, your account with us and your property  (b) Necessary to comply with a legal obligation
To manage the repairs, maintenance and adaptations of our properties.	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of the services for you  (b) Necessary for our legitimate interests (to maintain our properties)  (c) Necessary to comply with a legal obligation
To ensure tenancy (or contract) conditions are complied with, such as dealing with anti-social behaviour or fraud.	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of the services for you  (b) Necessary for our legitimate interests (to deal with anti-social behaviour, detecting and prosecuting fraud or otherwise ensuring that tenancy conditions are complied with)  (c) Necessary to comply with a

		legal obligation
To check that you are eligible for a social housing property.	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of the services for you (b) Necessary for our legitimate interests (to check your eligibility) (c) Necessary to comply with a legal obligation
To carry out affordability checks when looking at allocating a property.	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of the services for you (b) Necessary for our legitimate interests (to check your eligibility) (c) Necessary to comply with a legal obligation
To check you are able to manage a tenancy.	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of the services for you (b) Necessary for our legitimate interests (to check your suitability) (c) Necessary to comply with a legal obligation
<b>In relation to board and committee members (both applicants and successful candidates):</b>		
To consider your application for appointment as a board or committee member.	(a) Identity (b) Contact	(a) Performance of the recruitment process (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to conduct the recruitment process)
To comply with the agreement for services we have in place with you if you are successful in your application for board or committee member.	(a) Identity (b) Contact	(a) Performance of our obligations under the services agreement (b) Necessary for our legitimate interests (to comply with our contractual obligations)
To keep internal records.	(a) Identity (b) Contact	(a) Necessary to comply with a legal obligation
To comply with legal and regulatory requirements placed on us, for example	(a) Identity	(a) Necessary to comply with a legal obligation

keeping statutory records, those required by HMRC and various health and safety information.	(b) Contact	
To protect our position in the event of legal proceedings.	(a) Identity (b) Contact	(c) Necessary for our legitimate interests (in respect of legal proceedings)
To publish a summary of your career history and your photo if you are successful as a board or committee member (as applicable) on our website and in our annual report to help our customers and stakeholders understand how we are managed and ensure our management remains transparent and accountable.	(a) Identity (b) Contact	(a) Necessary to comply with a legal obligation  (b) Necessary for our legitimate interests (to report to our stakeholders and customers)
<b>In relation to website users:</b>		
To respond to any queries raised or contact made with us through the website.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	(a) Performance of the services for you  (b) Necessary to comply with a legal obligation  (c) Necessary for our legitimate interests (to respond to your queries)
To keep internal records.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Technical	(a) Performance of the services for you  (b) Necessary to comply with a legal obligation  (c) Necessary for our legitimate interests (to keep records)
To customise the website according to your interests and to present the information in the most effective way for you and your device.	(a) Profile (b) Usage (c) Marketing and Communications (d) Technical	(a) Performance of the services for you  (b) Necessary for our legitimate interests (to maintain our website)
To report on page views and general content consumption	(a) Profile	(a) Necessary for our legitimate interests (to monitor use of our

of our website.	(b) Usage (c) Technical	website)
To conduct research and statistical analysis to help improve the services offered to customers and our internal business processes, as well as to evaluate our performance against other benchmarks. When possible, statistical information is anonymised or pseudonymised. It is not used to make decisions about you.	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of the services for you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to conduct research and evaluate our performance)
To register you as a user to comment or use certain features of the site	(a) Identity (b) Contact	Performance of the services for you
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy; (b) Asking you to leave a review or take a survey; and (c) Providing marketing materials (such as a newsletter) to you subject to opting-in to such marketing materials.	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of the services for you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how members use our products/services)
To enable you to partake in a complete a survey or promotional activities.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of the services for you (b) Necessary for our legitimate interests (to study how members use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support,	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of

reporting and hosting of data).		a business reorganisation or group restructuring exercise)  (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how members use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, member relationships and experiences.	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of members for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about services that may be of interest to you.	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)
To administer any content uploaded to the website in forum or blog sections or otherwise.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)  (b) Necessary to comply with a legal obligation
<b>In relation to the Customer Hubb:</b>		
To send you relevant customer involvement opportunities.	(a) Profile (b) Contact	(a) Performance of the services for you  (b) Necessary to comply with a

		legal obligation
To administer our prize draw(s) through the Customer Hubb	(a) Identity (b) Contact	(a) Performance of the services to you  (b) Necessary for our legitimate interests (to verify eligibility to enter Stonewater's prize draw(s)).
<b>In relation to job applicants:</b>		
To conduct and manage the recruitment process.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	(a) Necessary for our legitimate interests (to assess new candidates in respect of job openings)
To keep records of the process.	(a) Identity (b) Contact (c) Profile	(a) Performance of the services for you  (b) Necessary to comply with a legal obligation
To assess and confirm a candidate's suitability for employment and decide to whom a job offer should be made.	(a) Identity (b) Contact (c) Profile (d) Financial	(a) Performance of the services for you  (b) Necessary to comply with a legal obligation
To respond to and defend legal claims.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Financial	(a) Necessary to comply with a legal obligation  (b) Necessary for our legitimate interests (to defend legal claims)
To monitor our diversity and equality responsibilities.	(a) Identity (b) Contact (c) Profile (d) Usage	(a) Performance of the services for you  (b) Necessary to comply with a legal obligation
To check a successful	(a) Identity	(a) Performance of the services for

applicant's eligibility to work in the UK before employment starts.	(b) Contact (c) Profile (d) Financial	you  (b) Necessary to comply with a legal obligation
To assess applicants to ensure that an reasonable adjustments are made for candidates that have a disability.	(a) Identity (b) Contact (c) Profile (d) Usage	(a) Performance of the services for you  (b) Necessary to comply with a legal obligation
<b>In relation to employees and third parties interacting with Stonewater:</b>		
To conduct training improving employee knowledge/skills, our business processes and the services offered to our customers.  To make suggestions and recommendations to you about services that may be of interest to you.	(a) Identity (b) Contact	(a) For our legitimate interests (for training and/or marketing purposes)
To provide third parties with copies of our thought leadership reports.	(a) Identity (b) Contact	(a) Performance of the services for you
To record online video conferencing meetings for marketing and training purposes or any other reason as expressly set out to you.	(a) Identity (b) Contact (c) Profile	(a) For our legitimate interests (for training and/or marketing purposes)

## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

- **Promotional offers from us**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).



You will only receive marketing communications from us if you have opted-in to receive direct marketing. You may remove your consent to receive direct marketing or object about direct marketing by contacting the relevant Stonewater Group entity by the contact information above.

We will obtain your consent prior to entering your details into any prize draws and associated promotions operated by us.

- **Third-party marketing**

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

- **Opting out**

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase, warranty registration, service experience or other transactions.

- **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see <https://www.stonewater.org/about-us/privacy-notice/cookies-used-by-this-website/>.

- **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law. Photographs may be taken and used for general marketing providing individuals give consent for business related purposes.

## 5. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table above:

- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.
- Specific third parties such as:
  - Experian as part of our rental exchange project to ensure our tenants are able to build up their own personal credit scores;
  - Allpay or other online payment solution providers for the purposes of providing a range of ways for our customers to make payments to us; and
  - Blue Octopus as part of Stonewater's recruitment process.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We will not sell your personal data on to third parties.

### Contractors

Our contractors are required to comply with the law and our own data processing agreement to ensure data is managed appropriately and for specified purposes, including to complete responsive or planned property repairs.

## 6. International transfers

Each member of the Stonewater Group is based in the United Kingdom (**UK**) and data is predominantly held on servers within the UK and we do not usually transfer or store your personal data outside the UK.

In the event that we, or some of our External Third Parties, transfer or store personal data on servers outside of the UK we take additional steps to ensure that your information is protected to at least an equivalent level, as required by applicable data protection laws.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data; and
- where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

Data security we have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **7. Data retention**

### **How long will you use my personal data for?**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you or due to safeguarding or care issues or under legislation in relation to Right to Buy and/or health and safety or otherwise.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data: see your legal rights below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## Are there any specific circumstances where personal data is held for a particular period of time?

In the following circumstances, we will hold your personal data for the time period expressly stipulated:

- **Website users** – if you make contact with us through the website and we have an on-going relationship with you, we may need to keep that information on your tenancy file to ensure our records are up to date. If you simply visit our website, cookies will expire after a much shorter period of time (see above).
- **Tenants** – our general policy is to retain your tenancy file for a period of 2 years following the termination of the tenancy so that we can use it where necessary for the purpose of collecting any unpaid rent, or resolving any other dispute arising under the tenancy, after which point it will be securely destroyed;
- **Successful committee or board members** – we will keep your information on file for 6 months after you leave Stonewater Group's service before securely destroying it. Whilst you remain appointed, we will ask you to check and update your information on an annual basis;
- **Customer Contact Centre** – our Customer Contact Centre phone calls are recorded for training and monitoring purposes and our recordings are usually held for a period of six months. Such recordings can also be used as evidence in disputes or investigations of our customers or colleagues;
- **CCTV** – we operate a continuous CCTV system at all our office premises for the detection and prevention of crime.. CCTV / sound recordings and / or use photography may be used to capture evidence of breach of tenancy, alleged anti-social behaviour or crime. For information about how long we retain CCTV for, please contact us directly;
- **Publicity** – we may also take photographs at our events, our properties and in our communities to use for general marketing and publicity. However, photographs of individuals will only be used for these purposes with your consent;
- **Job applicants** – if your application for employment is unsuccessful, your data will be held in the Blue Octopus Applicant Tracking System for 1 year after the end of the relevant recruitment process. At the end of this period your data is deleted from our systems. If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which employee data will be held will be provided to you in a new privacy notice.

If you would like to find out more information in relation to our retention and disposal policy, please see retention policy.

## 8. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- Request access to your personal data;
- Request correction of your personal data;
- Request erasure of your personal data;
- Object to processing of your personal data;
- Request restriction of processing your personal data;
- Request transfer of your personal data; and
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us.

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **9. Glossary**

### **LAWFUL BASIS**

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

## THIRD PARTIES

### Internal Third Parties

Other companies in the Stonewater Group acting as joint controllers or processors and who are based in the United Kingdom and looking for appropriate suppliers, consultants and contractors or otherwise.

### External Third Parties

- Service providers, other customers relating to complaints, payroll providers, suppliers, repairs, maintenance providers, and health & safety consultants, utility companies, business partners and sub-contractors acting as processors based in the United Kingdom and the European Union who provide IT and system administration services;
- Professional advisers acting as processors including probation services, support workers, doctors, drugs and/or alcohol services, members of parliament, lawyers, agents, mortgage brokers, financial advisors, court agents, surveyors, valuers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services;
- Credit reference agencies for the purposes of carrying out credit reference checks;
- The Police, Home Office, Department of Work and Pensions, HM Revenue & Customs, regulators and other authorities (including local authorities and fraud departments) and government agencies based in the United Kingdom who require reporting of processing activities in certain circumstances;
- Health and social care professionals, previous care providers – for information about your health, care and support needs, and those of your household (including your children);
- Charitable organisations for the purpose of providing support and services;
- Website designers and marketing agents acting as processors based in the United Kingdom who provide their services which may require access to personal data;
- Analytics and search engine providers that assist us in the improvement and optimisation of our website;
- Language translation service providers if it is necessary to translate any information into or from a foreign language for you;
- Research Companies to carry out research on our tenants or communities in order to improve services, know more about our tenants/communities or establish if there are any gaps in the services



we provide. On these occasions, if contacted, you can refuse to participate in the research without prejudice;

- Debt collection agencies and legal advisers for the purpose of collecting rent and any other payments due under the tenancy agreement, and any other enforcement issues;
- Contractors who are carrying out services on our behalf;
- Estate/letting agents who carry out assessments on our properties. On these occasions, if contacted, you can refuse individuals entry until after your tenancy; and
- IT and software providers who supply us with our IT infrastructure for the provision of our services and administering our business (including our internal and external communications) and who also help us manage our customer and contact databases, customer relationships and marketing (including but not limited to maintaining secure and up-to-date tenancy records and filing systems).

## YOUR LEGAL RIGHTS

You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Version	Date	Author	Changes
1.0	May 2018	Chris Davison	
2.0	September 2021	Ben Swiergon	Incorporation of other privacy notices into one consolidated notice.
2.1	March 2022	Ben Swiergon	Addition of MyHome app and added clarification on charitable organisations.

