



## Privacy statement

Greatwell Homes ('Greatwell') ('we', 'us', 'our') respects an individual's right to data privacy and data protection in line with the UK General Data Protection Regulation (UK GDPR), Data Protection Act 2018 and associated data protection legislation.

This Privacy Statement (version 2) is to advise you of how Greatwell will collect, store, use, share, protect, and otherwise process your personal data. If you have a tenancy or other written agreement with us it may contain further information about our processing of your information.

Personal data is information that identifies you and includes special category personal data, such as information about your health, or religious and political beliefs. For the purposes of this Privacy Statement, personal data and special category personal data is collectively known as 'information'.

We reserve the right to make changes to this Privacy Statement at any time and we recommend that you regularly review this Privacy Statement to ensure that you are aware of any changes to how your information may be used. If you are a tenant or resident, you may also be separately notified of changes to how we process your information.

Greatwell is the controller (meaning the company who is responsible for and controls the processing) of the information that you supply it with and on occasion this information may be shared with a third party who will act as a Data Processor to carry out a specified function on behalf of Greatwell.

If you have any requests concerning your information or any queries regarding this Privacy Statement, please contact us.

The Data Protection lead at Greatwell Homes is Jenny Perkins who can be contacted at [data.protection@greatwellhomes.org.uk](mailto:data.protection@greatwellhomes.org.uk)

## What does this Privacy Statement apply to?

This Privacy Statement applies to information that we collect from or about our customers, staff, Board members, contractors and suppliers, other third parties and visitors to our premises, events, websites, wireless networks, platforms or portals.

We collect information via:

- The Greatwell Homes website and mobile site
- Greatwell portal and app including the Tenancy Information Portal
- Our wireless networks
- Customer call centres/Out of Hours providers/Contractors
- Application forms
- Landlord references
- Financial checks
- Payment information
- Employment Contracts
- Employer/Character references
- Disclosure and Barring Service (DBS) checks
- Local Authority and Health Services
- Police and Courts
- Tenancy / Leaseholder Agreements
- Personal interviews
- Surveys
- User groups and community events
- Customers
- Contact forms
- Telephone conversations
- Emails
- Verbal, written and visual messaging and social media platforms including, but not limited to
  - Facebook;
  - Instagram;
  - LinkedIn;
  - Messenger;
  - Teams;
  - X;
  - WhatsApp and

- YouTube.
  
- Webchats
- Surveillance Camera Systems including dashcams and door entry systems
- Location monitoring systems including vehicle trackers, fob entries, device locations
- All systems used by the group including:
  - Recruitment, HR and payroll management systems;
  - Housing Management and Allocation systems;
  - Repairs appointments and Asset Management systems
  - Insurance systems
  - Procurement and Supplier management systems
  - Information management systems; and
  - Invoicing and payment management systems.

We also collect information from other sources. For instance, we may hire a third-party organisation to collect information on our behalf to conduct tenancy surveys, and this would be done to provide us with additional information on our customers in order to shape service delivery. We may also get information about you from third-party referrals.

## **What information is being collected?**

Your relationship with us determines what information we collect from you.

We aim to limit the amount of information we process to that which is reasonably necessary to

- provide you with our services;
- respond to concerns or issues raised;
- enter or remain in a contract or agreement with us; or
- fulfil the requirements of a former contract or agreement.

We will not combine the information given for one purpose with other non-compatible purposes.

The types of information that we collect can be categorised as:

### **Personal information**

This information includes your:

- name (including any previous names)
- date of birth;
- gender;
- nationality;
- residential status; and
- national insurance number.

This type of information may have been collected when you were accessing a service or applying for/entering into a contract with Greatwell.

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### **Special category information**

In order to access or influence some Greatwell services, enter or be in a contract with us, and for legislative requirements, it may be necessary to collect your special category information.

This type of information includes, for example, details on your:

- marital status;
- race;
- ethnicity; and
- physical or mental health medical needs including pregnancy status.
- Criminal convictions, offences and behaviours
- Trade Union Membership

In order to be offered a contract of employment or tenancy; for a legislative requirement; or to manage anti-social behaviour cases, it may be necessary for you to declare any spent and/or unspent criminal convictions, offences or behaviours and in some instances agree to have a DBS (Disclosure and Barring Service) check. If we ask you for this information, we will always let you know at the time why it is necessary.

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### **Personal contact information**

This is the information that you have given us so that we can contact you and includes:

telephone numbers;

email addresses;

alternate postal addresses; and

Next of kin details.

Account login information

If you set up an online account with Greatwell this would refer to the username, password and answers to the security questions you would have used in order to manage your online account.

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### **Technical computer information**

This is information about the device you have used to access a website, platform, wifi service or portal. This information is usually collected through cookies and can include the IP address, MAC address, source and destination traffic information, operating system and browser; if accessing through a smartphone this can also include the phones unique ID.

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### **Customer/visitor feedback**

This is information you voluntarily share with us about your experiences with Greatwell, and includes unsolicited comments, suggestions and feedback which is typically collected in surveys, user groups, contact forms, website or social media comments and emails.

The information is used to improve services; know more about our customers or establish if there are any gaps in what we are doing. Individuals can provide feedback voluntarily at their discretion.

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### **Social network information**

This refers to any information that is part of your profile on a third-party platform such as Facebook or X, that you allow to be shared with us, this is usually your name and profile picture but may also include your date of birth and email address.

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### **Third party information**

There are occasions where we obtain information from other sources about you, depending on the purpose this will include personal information, special category information and contact information and this information may be used for the purposes set out above. These sources might include local authorities and health services; the Police and Courts; out of hours providers and contractors; previous employers or fellow customers, for example.

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## **Images and sounds**

### At our premises

At our offices and some of the premises that we manage, we operate surveillance camera systems including door entry systems, this is done in order:

- to help deter and/or detect crime, anti-social behaviour or breaches of contract;
- to provide evidential material for court or alleged misconduct and/or holding disciplinary hearings;
- to help reduce the fear of crime;
- to provide assistance in the overall management of public safety;
- for staff monitoring and safety; and
- to enhance community safety.

The locations where there are surveillance camera systems will be clearly marked by appropriate signage at entranceways and near the camera locations. These systems will record images and/or sounds, which will always be indicated on respective signage.

### Of your home

If you contact us to discuss an issue you are having or request a repair to your home, our customer services team may ask you to send us pictures of the repair that needs undertaking. Our customer services team may then save the pictures you send to your file.

We will always make you aware when making the request for pictures that the images will be stored on our systems. We will not keep the images for longer than necessary and in any event in line with our retention policy.

### Promotional recording of images and sounds

There may be occasions where your image or voice is captured for the purposes of promotional materials.

Consent for this will be obtained at the point of capture and you are able at any time to ask us to stop using your images or sounds in promotional materials whilst being aware that we may be unable to remove them from already published materials or videos, at no time does this diminish your data protection rights.

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## **Covert recordings**

There may be occasion when sound monitoring or video recording systems will be used covertly, and signage will not be present as:

- telling someone that we are making the recording would seriously prejudice the reason for making the recording; or
- there is good cause to suspect that an illegal or unauthorised action(s) or breach of contract, anti-social behaviour or crime and disorder is/are taking place or about to take place.

We will comply with the requirements of the Regulation of Investigatory Powers Act 2000 (RIPA) when operating covert surveillance camera systems.

We will only carry out such recording for a limited and reasonable amount of time consistent with the objectives of the monitoring and only to detect a specific activity.

We will fully document all covert recordings showing who made the decision to use covert monitoring and why.

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## **Call recordings**

Calls received by or made to Greatwell Homes may be recorded, this is done to provide an exact record of a telephone conversation in order to:

- Help identify colleague training needs, improve performance and the customer experience;
- Help protect colleagues from abusive or nuisance calls;
- Provide assurance of Greatwell's quality standards and policy adherence;
- Support call levelling sessions and individual feedback;
- Ensure Greatwell complies with regulatory procedures and to provide evidence in the event of a dispute or complaint;
- Ascertain and demonstrate that calls are accurately transcribed onto the case management system;
- Be used as evidence in the event that a colleague's conduct is deemed unacceptable;
- Demonstrate transparency; and
- Prevent or detect crime or safeguarding requirements.

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## **Location information**

Our employees are provided with identification cards that allow them access to our offices. These cards track the location of the card user by recording the buildings and areas they access and at what time.

For safety and staff training purposes as well as resource management, our work vans have tracking devices installed that record location information as well as dashcams that show locations visited. Our business mobile phones and IT equipment are set up with location settings enabled, which mean they track their users' location data.

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### **Information about your property**

You may find that environmental or appliance monitoring equipment is present in your property. This equipment is used by Greatwell Homes to monitor the performance and status of the appliance within your property and does not monitor you.

For instance, monitoring equipment on a boiler will be able to provide us with information such as the boiler's location (address), the temperature it is set at, the humidity and temperature of the room the boiler is in and if there is an error code being displayed by the boiler. This will allow us to provide you with a faster response to any problems you might have with your boiler or other appliances and aims only to provide you with a better standard of service.

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### **Teams meeting recordings**

Calls/meetings held via Microsoft Teams may include external parties as well as staff, these calls/meetings may be recorded for staff training, customer service and/or record-keeping purposes.

Participants are made aware of the recording and the recording will not be kept for longer than necessary and in line with our retention policy.

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### **Teams recruitment recordings**

Calls/meetings for recruitment purposes held via Microsoft Teams may include external parties as well as staff. These calls/meetings may be recorded for staff training and/or record-keeping purposes. Participants are made aware of the recording and the recording will not be kept for longer than necessary and in line with our retention policy.

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### **Teams grievance/disciplinary recordings**

Calls/meetings held via Microsoft Teams for the purposes of investigations, grievances or disciplinary purposes may include external parties as well as staff.

These calls/meetings may be recorded under the legitimate interest lawful basis for record-keeping purposes in our investigations/grievance/disciplinary,



with further freely given explicit consent given by all parties both before the recording and at the start of the recording.

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### **Internal/External systems**

Whilst using the systems provided by Greatwell, individuals may directly or indirectly share information about themselves, friends, family members, associates or third parties on systems that are managed by Greatwell.

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### **Arrears Management**

Whilst using the systems provided by Greatwell, individuals may directly or indirectly share information about themselves, friends, family members, associates or third parties on systems that are managed by Greatwell.

We collect personal information necessary for the effective management and collection of arrears. The types of data we collect may include:

- Contact Information: Name, address, phone number, email address.
- Financial Information: Payment history, outstanding balances.
- Identification Information: National Insurance details and bank sort codes and account numbers where required.
- Communication Records: Emails, letters, or any other forms of communication between you and our organisation.

### **Doorbell videos**

The footage recorded by a video doorbell can, in some circumstances, be used as evidence for sharing with police or the authorities in anti-social behaviour cases.

## **Use of your information**

The purpose for which you are interacting with us establishes the lawful basis that we will use to process your information under data protection legislation.

At a minimum, the information will be needed for at least one lawful basis and may need to be shared with third parties to fulfil the purpose for which we are processing it.

The lawful basis are:

- The information is processed in order to perform a contract that we have or have had with you or a contract that you are wanting to enter into with us. This includes: verifying your identification and Right to Rent; administrating the agreement between us (including the application process, breach management and tracing your whereabouts to contact you or recover debt); and providing you with services under the contract (e.g. managing your account, communicating with you, providing you with updates, dealing with complaints, notifying you of any changes and managing our repairs and maintenance service).
- The processing of the information is necessary for our legitimate interests or that of a third party. This would include: updating you on the activities of Greatwell; communicating with and understanding your needs and requirements - tailoring our services and products to suit; verifying your identity; preventing fraud and money laundering and for managing and auditing our business operations.
- It may be that in order to comply with a legal obligation we may need to process your information. This will include when you want to exercise your Rights under Data Protection legislation as well as establishing and defending Greatwell's legal rights. It also applies to activities relating to the prevention, detection and investigation of a crime including the carrying out of fraud prevention checks and for our compliance with our legal and regulatory responsibilities.
- There are some occasions where we may need to rely on your consent to process your information. This may happen if you have opted into one of our marketing mailing lists or if you have sent a CV to Greatwell Homes regarding employment opportunities. You control the consent that you give us, and you can change or withdraw consent at any time.
- On rare occasions, when a life is at risk, it may be necessary for Greatwell Homes to share your information under the lawful basis of vital interests. An example of this is your child is at risk and we are contacted for your details we will share your information with appropriate third parties to speed up the situation and enable relevant permissions to be granted.

Additional lawful basis of processing will be in place when processing your special category information or information relating to criminal convictions and offences.

## **Information about other individuals**

If you want to act on behalf of someone else, we need to have the consent of that person to do this. To be able to act as an 'Authorised Person' for someone else you must consent to us processing your information for this purpose. This consent by either party can be amended or withdrawn at any time.

In acting as an Authorised Person, you confirm that you are acting on their behalf and have consent to discuss their information subject to any restrictions that they have imposed.

Whilst Greatwell would not ask you for information relating to other individuals without a lawful basis we understand that through communications with Greatwell you may directly or indirectly supply information relating to friends, family members, associates or third parties.

## Monitoring

We may monitor and record communications with you (such as telephone conversations and emails) for the purposes of quality assurance, staff training, fraud prevention and dispute resolution.

## What do we use your information for?

The following describes the various purposes for which we might process your information and the different types of information that might be collected from you.

Please note that not all the uses will be relevant to every individual.

### Contracts

In order to apply for, enter into or allow us to manage a contract you have with us it will be necessary to use the information you gave to us in an application form, or CV.

This may include special category information as well as your contact information and information on your unspent criminal convictions and offences.

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### Tenancy management

In order to maintain your account with us, we may use the information that was given to us when the account was initially set up - which could be from your application form, and it would include your personal information and contact information.

- **Arrears Management:** To manage your account, track outstanding balances, and process payments.
  - **Legal Compliance:** To comply with legal obligations and regulatory requirements in accordance with your tenancy agreement
  - **Communication:** To send notices, reminders, and other communications related to your account.
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## **Service provision**

There are some services provided by Greatwell Homes that as well as requiring the use of your personal and contact information also require the use of your special category information or information about your unspent criminal convictions, offences or behaviours, or information about your property.

For instance, in order for us to provide you with services to assist you in the sustainability of your tenancy, it may be necessary for our income team to process your special category information to establish your benefit entitlements.

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## **Customer services**

Services can be provided through different means e.g. in person, by email, through Teams, by Social Media or over the phone. During these interactions we may collect and use your personal, special category and Greatwell account information to validate your identity, we will also use your contact information to respond to your enquiries and analyse response to look for trends.

Queries and complaints will be recorded by our staff to resolve or answer them. If you wish to make a complaint, you will be guided through our complaints process by a staff member. We may use some of your location data and personal information that relates to your opinion of the services we have provided to you in considering your complaint. We will record your customer satisfaction data and combine this information with that of other Greatwell customers to give us a better picture of the services we are providing and allow us to deliver better services to our customers.

If you make a complaint or query via a Councillor or Member of Parliament and ask them to get in touch with us on your behalf, it will be expected that you have already given your consent to them for them to do this.

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## **Customer engagement**

In order to encourage and obtain customer engagement and feedback we may get in touch with you using your contact information to collect your opinions about the services we offer or have provided to you.

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## **Customer segmentation, personalisation and profiling**

Greatwell Homes undertakes some customer segmentation processing activities by dividing our customer base into groups based on common characteristics. These activities are led by our aim to improve our customer service performance and to provide our customers with effective and appropriate services.

These processing activities allow us to deliver a better service to you by understanding your preferences better or by providing you with certain services based on your personal information characteristics (including your special category personal data such as your age, health or vulnerability data).

We may also place tags or notes on your records in our databases that reflect your preferences or help us to better understand your needs as our customer. We may then analyse your characteristics to make decisions about you in a process known as profiling.

These activities will never be undertaken on your personal information alone and will never be used to diminish the services provided to you.

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### **Automated decision making**

Sometimes we use your personal data in automated processes to make decisions about you, such as credit scoring. We do this to help ensure decisions are made accurately, fairly, and efficiently and to offer services tailored to you.

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### **Competitions and promotions**

We occasionally run competitions through our websites or third-party platforms such as Facebook or X.

Entry to these requires the use of your personal and contact information, which you provide on the lawful basis of your consent to be entered into the competition. If you win a competition, you will be contacted for your consent before we post your details on our websites or social media platforms.

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### **Communications**

We may process your information and send you communications to fulfil our contractual or legal obligations as a social housing provider, this could include messaging on route for an appointment. We will usually ask you to confirm a primary contact for when we want to get in touch with you and will try to follow your preference unless there are extenuating circumstances that prevent us from doing so. You can confirm this primary contact preference using the customer portal or by letting one of our customer service team know, who can update your preferences for you.

These communications may include some of the following:

- Rent reviews;
- Service changes;
- Repairs appointments;

- Annual reports; and
- Building information.

We may also process your personal information for carefully considered and specific purposes if we have a genuine and legitimate reason to do so and we are not harming your rights and interests.

This may include some of the following:

- Postal communications which we think will be of interest to you;
- Messaging to confirm/remind customers of requests/appointments; and
- Email newsletters about our activities, performance, and support services

These communications are designed to:

- Demonstrate how we are supporting the communities we serve;
- Raise awareness of the support services we provide;
- Allow us to enhance the services we provide to our customers and stakeholders; and
- Keep our customers and stakeholders informed with our activities to ensure a better experience and relationship.

You can ask not to receive some communications, but there are some items that we are legally obliged to send you irrespective of whether you want us to.

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## **Direct Marketing**

For us to send you direct marketing materials, you have to have given us consent as it requires the use of your personal and contact information. As with all forms of consent it can be withdrawn or amended at any time.

Please note that if you have participated in a competition or promotion that involved a third party and you agreed to receive marketing information from them, you will need to contact them directly to withdraw consent from receiving further direct marketing materials from them.

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## **Website improvement and personalisation**

In order to improve, tailor and personalise your experience on our websites, platforms and portals, we may collect and use your technical computer and account login information.

If you do not want us to do this you will need to change your preferences in your browser settings, please be aware that you will have to change this preference on

each device that you use, and it will mean that you have to complete login information on every visit.

This information is used for website and service improvement, and although your device may be identified from this data, we use it in the format of anonymous analytics.

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### **Monitoring requirements**

For legal compliance and monitoring purposes we may use your personal and special category information.

An example of this is for equality & monitoring purposes where we would collect information on your gender, ethnicity and race. We ask for this information on the basis of your consent. You are not obliged to give us equality and diversity information.

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### **Security**

To keep our office buildings safe and secure, we limit access to the buildings by implementing an identification card access system. The identification cards record location information to allow us to maintain an awareness of who accessed which of our office buildings and when.

For safety and staff training purposes, our work vans have tracking devices installed that record location information. Our business mobile phones and IT equipment are set up with location settings enabled, which means they track their users' location data.

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### **Other general purposes**

In order to maintain the day-to-day operation and security of our website/platforms/portals and conduct demographic studies, we may process your technical computer information, such as your IP address and location data, and consumer feedback.

## **Protecting your personal information**

We are committed to ensuring that your information is secure.

At all times Greatwell Homes takes both technical and organisational measures to protect the confidentiality, integrity and security of personal information, irrespective of the method of collection.

## **Refusing to give us personal information**

There are occasions where you may not want to share with us your information or you may want to withdraw previously given consent to hold information. This is well within your Rights however it may impact upon the service we are able to provide you and we will have to record the refusal or withdrawal of consent.

Please note that there are some items of information that you cannot refuse or withdraw consent from if you wish to enter into or remain in a contract with us, or we are processing your information to meet a legal obligation.

## **Disclosing your personal information**

We will never share information with any third party that intends to use it for direct marketing unless specific consent has been given by you for this purpose.

There are occasions when we will need to share your information with selected third parties. On these occasions, we will ensure that the third party keeps information private and secure.

Information will only be shared with the following types of third parties:

### **Contractors**

To provide a service to you, it may be necessary for us to appoint a contractor. The contractor would need to know your name and address as well as your contact information in order to organise and carry out an appointment.

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### **Utilities companies**

Where there is a statutory obligation or legal requirement to do so, we may share your personal information with utilities companies, we also have the legitimate interest in advising a utility provider of a change in tenancy.

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### **Research companies**

We may appoint a research company to carry out research on our customers or communities in order to improve a service; know more about our customers/communities or establish if there are any gaps in what we are doing, on these occasions, if contacted, individuals can refuse to participate in the research.

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### **Local Authority departments**



In order to act on your behalf and organise services it may be necessary to share your information with Local Authorities, examples of this include benefit entitlement queries and accessing support services and occupational health.

The information that would be shared on these occasions is dependent upon the local authority service that is being accessed but will include your personal and contact information.

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### **Councillors / MPs**

If we are contacted by a Councillor or Member of Parliament who is acting on your behalf, we will need to share your information with them in order to answer the complaint or query you have raised with them, on most occasions it will be assumed that you have already given the required consent to do this however if deemed necessary, we will contact you for consent.

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### **Emergency Services**

There may be occasions where we need to share your personal, special category and contact information with the Emergency Services.

This will need to happen if you are involved in an incident where Emergency Services are involved or if it is required in case of an emergency i.e. the emergency information box in an independent living scheme.

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### **Doctors or other medical professionals**

In order to ensure that you are able to apply and access the support, services, contract and accommodation that you are entitled to, it may be necessary to share your personal and special category information with doctors and other medical professionals.

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### **Solicitors / Insurance providers / Valuers / Data Protection Practitioners**

We will need to share your information with solicitors, loss adjusters, insurance providers/brokers/consultants, claims inspectors or valuers in order to progress an insurance/disrepair claim, property/land purchase or complaint with Greatwell.

We will need to share your information with solicitors or data protection practitioners in order to obtain advice or have them act on our behalf for items relating to data protection including Subject Access Requests (Right of Access), Erasure Requests (Right to be Forgotten) and Amendment Requests (Right to Rectification).

We will need to share your information with solicitors in order for us to obtain advice or have them act on our behalf for issues relating to disciplinary or employment

matters involving former, prospective or current colleagues or for housing related matters such as possession proceedings, anti-social behaviour, boundary issues or ombudsman complaints.

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### **Out of Hours**

Your information will be shared with our 'out of hours' support teams to ensure that if you do need to contact us outside of our business hours, we are able to manage your query efficiently.

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### **Court**

If you are involved in any form of court action, we will share your information with the court involved.

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### **Regulatory Authorities**

There are occasions where it may be necessary for us to share your information with our regulatory authorities, when this does occur the minimum of information required to carry out the requirement is shared.

When you obtain a social housing tenancy or purchase a social housing property from Greatwell Homes, the Ministry of Housing, Communities & Local Government requires us to complete a Continuous Recording of Social Housing lettings and Sales (CORE) log. Further details on this process and what happens with your information can be found in their [Privacy Notice](#).

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### **Auditors**

In order to assess our services, we regularly have audits carried out which to be managed correctly required us on occasion to share your personal information.

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### **Legal and Business transfers**

By law there are occasions where we must disclose your information, for instance, if it is necessary to comply with legal proceedings or in order to protect the safety or rights of Greatwell Homes, its customers or the public.

In the event of a merger/acquisition of part or the whole of Greatwell Homes the partner/acquirer would have access to the information obtained by us and this information could be transferred as part of a reorganisation or similar event if permitted by and carried out in accordance with applicable law.

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## **Arrears Management**

In order to manage arrears, we may appoint a third party housing and tenant engagement solution provider.

## **Internet Based Transfers**

Given that the Internet is a global environment, using the internet to collect and process personal information necessarily involves the transmission of information on an international basis. We only use internet and data hosting providers outside of the EEA where there is an additional safeguard to ensure the security of information we process, as set out in chapter V of the UK GDPR.

## **Accessing and amending your personal information**

You have rights under the UK GDPR regarding the information Greatwell Homes processes about you.

These rights include:

### **Right to Object**

You have the right to ask us not to process your information where we process it on the lawful basis of a legitimate interest, including for direct marketing purposes. We will ask you when we collect your personal information if we can use your information for such marketing purposes or if we can disclose your information to any third party for such purposes. You can opt-out of receiving such marketing at any time without prejudice.

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### **Right of Access**

You have the right to access the information that we hold about you, to know what we hold, what format it is in and to have a copy of it if you wish. This is called a Subject Access Request. This is a more formal process than, for example, simply requesting a second copy of your rent statement. Our staff will explain when your enquiry falls under the Subject Access Request process.

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### **Right to Rectification**

If the information we hold on you is incorrect you have the right to ask us to correct it without undue delay and free of charge.

For us to correctly manage your request, you will be required to specify the information that is incorrect and what it should be replaced with.

There may be occasions where we require additional information to process your request - such as a name change needing proof of the change of name.

You can exercise this right at any time by contacting us at [data.protection@greatwellhomes.org.uk](mailto:data.protection@greatwellhomes.org.uk)

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### **Right to Erasure / Right to be forgotten**

You have the right to request that all information held by Greatwell Homes which identifies you is deleted.

There are occasions though where we may be compelled to maintain your information due to specific legislative or regulatory requirements, examples of this are the requirement to keep a copy of invoices in case of an HMRC investigation, or if you have held a contract with us, we will retain that information.

You can also make this request at any time by contacting us at [data.protection@greatwellhomes.org.uk](mailto:data.protection@greatwellhomes.org.uk)

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### **Right to Complain**

You have the Right to Complain to our data protection supervisory authority which is the [Information Commissioners Office \(ICO\)](#), if you feel that we have not dealt with your request for information properly or you have a concern about the way in which we are handling your information.

The first step before contacting the ICO would be to first contact us and allow us to help rectify your issues however if this fails or you remain dissatisfied the ICO can be contacted online at: <https://ico.org.uk/make-a-complaint/your-personal-information-concerns/> on the phone by calling: [0303 123 1113](tel:03031231113) or you can write to them at:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

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### **Consent**

There are occasions when it will be necessary for Greatwell Homes to get your consent to process your information, when this does happen it will be clear for what purpose we are requesting the consent and you are able to amend or withdraw it at any time.

# Tracking technology

## Cookies

We use cookies to gain an understanding of how you use our website and platforms. Cookies can contain your IP address, operating system and browser address.

Having cookies stored on your device enables us to improve and personalise your experience, if you want to you can turn off cookies in your device's browser, however, this may impact your experience and require you to log back into certain areas on each visit.

## Spamming

Spamming is where unsolicited e-mails are sent to you containing advertisements or marketing related materials without your consent.

Greatwell Homes will not send you spam emails, and we will not share your email address with third parties for them to use in this way.

If for some reason you believe you have received a spam e-mail from us, please contact us at [data.protection@greatwellhomes.org.uk](mailto:data.protection@greatwellhomes.org.uk)

# Where we store your personal information

All information you provide to us is stored on our secure servers in the UK. Any payment transactions will be encrypted.

The information that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA") by one of our suppliers. Such suppliers may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. Where this is the case, your data will be protected by an appropriate safeguard providing equivalent data protection measures to those in the UK. In most cases, this safeguard is the model data transfer clauses authorised by the European Commission.

Where we have given you (or where you have chosen) a password that enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

## How long do we keep your personal information?

We will only keep your information as long as is reasonably necessary and in line with our data protection and retention policy. This does mean that your information may be retained for a period of time after you have stopped using our services or the website/platforms.

## **Children**

In accordance with the UK GDPR, Greatwell will take care of the personal information of children, and recognise children above the age of 13 are generally capable of exercising their own data protection rights.

## **Links to third party sites**

On occasion, our website/platforms may have links to third party sites. Visiting these sites is done at your own risk and we do not control or have any responsibility or liability for the content or practices of any third party site, application or feature.

Please check the relevant third party's privacy policies before you submit any personal information to these websites.

## **Contacting us**

Our registered office is PO Box 8041, Wellingborough, NN8 9ND

Phone: 01933 234450

Email: [customer.services@greatwellhomes.org.uk](mailto:customer.services@greatwellhomes.org.uk)

## **Legal notice and version control**

On occasion, Greatwell Homes will make amendments to this Privacy Statement. We recommend that you check this Privacy Statement regularly to see the changes and how they may affect you.