



## SUMMARY

**Gloucester City Homes Limited** is proud to release this document into the public domain, so that it is available to all. It explains who we are and how and why we process data. We take pride in our work and the positions that we hold in our community.

Data Protection places obligations and responsibilities to an organisation in terms of how we manage, how we use, and how we protect data. As an organisation we were registered as a Controller of Data under the Data Protection Act 1998 with the Information Commissioners Office. On the 25<sup>th</sup> May 2018, the EU Regulation the General Data Protection Regulations (known as GDPR) comes into force, requiring a European wide approach to data protection. GDPR is built around the principles of transparency and control. It is important to us that you are aware of Individual rights that the GDPR provides. . .

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling

We would encourage further use of the Information Commissioners Office (ICO) detailed guidance on the Rights that an Individual holds. This guidance is available for free via the ICO website at the following URL:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

Gloucester City Homes (GCH) is a not for profit Community Benefit Society with charitable status and an independent registered housing association which owns and manages rented homes, leasehold properties, shared ownership properties, commercial units and homeless units.

The organisation became a Housing Association in March 2015 following stock transfer from the local authority with overwhelming tenant support of 89%, having been originally set up as an Arm's Length Management Organisation in 2005 to deliver the Government's decent homes standard.

Highly valued and trusted by our tenants, we are recognised as one of the best housing providers in the country through independent accreditation including the cabinet office Customer Service Excellence Standard, Investors in People Gold Award; Sunday Times Top 100 non-profit making organisation; the Equalities

Standard and the British Standards Institute ISO 9001:2015 recognition for quality management processes.

Gloucester City Homes is responsible for the collection, processing, storage and safe keeping of any personal information you provide to us directly and on this website and as part of accessing and delivering the services we provide as a not for profit social housing landlord.

## DATA PROTECTION

**Gloucester City Homes Limited** is responsible for the collection, processing, storage and safe keeping of any personal information you provide to us directly and on our website and as part of accessing and delivering a service. The information you provide will be managed in accordance with EU Regulation EU 2016/679 known as General Data Protection Regulations (GDPR)

**Gloucester City Homes Limited** is registered as Data Controllers with the [Information Commissioner Office](#), registration number: ZA127324. We define our normal activities as

- Providing Social and other types of housing or leasing of properties.
- Administering waiting lists.
- Property and grounds maintenance and repair.
- Managing your house, tenancy/lease and accounts as a landlord.
- Managing our accounts and records.
- Supporting and managing our employees, agents or contractors.

We also provide additional optional services that include but are not limited to:

- Organising and assisting in community events.
- Offering opportunities to be involved (co-regulation).
- Providing welfare, benefits and debt advice (WBDA)
- Adaptations made to the properties that we manage
- Selling properties

We are located at Gloucester City Homes, Railway House, Bruton Way, Gloucester, GL1 1DG

## WHAT IS DATA PROTECTION?

Data Protection is how organisations make sure that they look after important information they hold on individuals. The GDPR sets out rules for processing personal information to ensure it is handled properly, and ensures that Data Subjects or individuals that the data relates to have protection and rights toward that data.

We understand and are committed to our obligations in relation to the processing of personal information and acknowledge that all individuals have a right to expect that their privacy is respected and that personal information will be processed in line with the GDPR.

We will fully comply with the principles of the GDPR along with associated laws and codes of practice to ensure that your personal information is adequately protected. This Privacy Notice demonstrates our commitment to the principles of the Regulations. It aims to protect and promote your rights as an individual and ensure that your privacy is maintained. Our policy is also supported by a number of procedures and appropriate training.

## HOW DO WE COLLECT INFORMATION?

Gloucester City Homes collects information from you via a variety of sources, including when you apply for one of our properties or services, complete one of our forms, when you call, write, e-mail or meet with us or respond to a survey. We may collect information when you use our social media sites, websites or self-service portal. Our landline telephone calls are recorded for training and monitoring purposes and our recordings are usually held for a period of six months.

We operate a CCTV system at our office premises for the detection and prevention of crime. It operates continuously and recordings are held for one month. From time to time we may operate CCTV / sound recording and / or use photography to capture evidence of breach of tenancy, alleged anti-social behaviour or crime. We may also take photographs at our events, at our properties and in our communities to use for general marketing and publicity. However, photographs of individuals will only be used for those purposes with your consent.

We may receive information about you from third parties including:

- Your council or benefits office relating to your housing.
- Prior landlords and other connected relevant interested parties when you apply for housing.
- Police, welfare or support organisations dealing with you.
- Councillors, MPs or other representatives acting on your behalf/instruction.
- Financial institutions when you apply for our services.

## **What information do we collect about you?**

We require the following information about you, the tenant(s) or leaseholder(s)

- Full name (and proof of your identity / photo ID).
- Date of birth.
- National Insurance Number (your unique identifier).
- Contact details (telephone, e-mail or correspondence address).
- Details of anyone authorised to act on your behalf if applicable.
- Basic details (name and DOB) of all household residents.
- Banking details if you pay your rent by Direct Debit.
- Card details if you pay by card (however card details are not stored).
- Proof of housing eligibility, any interest or equity in other property.
- Other personal information that will vary on a case by case basis to help us resolve breach of tenancy, alleged anti-social behaviour or fraud.

The information we may collect from you includes:

- Disabilities or vulnerabilities. We use this information to tailor our service to better meet your particular circumstances and needs. We may use this information for safeguarding of staff.
- Financial information. We may use this to help resolve arrears payments and optionally to provide welfare, benefits and debt advice as a free service to help you budget and pay your bills. We may use this to apply for funding on your behalf.
- Health information when we require this to support funding for adaptations made to the property you are living in. More specific details are provided if you use this service.
- Photo ID, bank statements, payslips or income details when we require this information for processing a house sale or purchase.
- Criminal Convictions. We require this information to assess any support required and any risk that ex-offenders may present to us and our agents, other tenants and the community at large.

If you do not provide the requested information that we need as part of our systems and processes we may not be able to provide all of our services to you, and may not be able to offer a tenancy, lease, or contract with us.

## **What Processing do we undertake?**

The information we require from you is used to manage and support you on a tenancy or leasehold agreement or contract, contract for provision of goods and/or services, held by you and us (Gloucester City Homes). You are advised to carefully read and understand the terms and conditions of your agreement or contract. Your contract with us, and the information disclosed as part of this, will be processed by us on a lawful basis of processing due to the performance of contract.

To this end, it may be necessary at any time during your agreement and/or contract to process your information as part of our systems, processes or procedures, and in

relation to the performance of the agreement and/or contract. Example processing activities can be summarized as:

- Managing your account charges and payments, including arrears.
- Managing the repairs, maintenance and adaptations of our properties.
- Ensuring tenancy (or contract) conditions are complied with, such as dealing with anti-social behaviour or fraud.
- Complying with relevant legislation and regulation.

Gloucester City Homes conducts research and statistical analysis to help improve our business processes and the services offered to our customers, as well as to evaluate our performance against other benchmarks. When possible, statistical information is anonymised or pseudonymised.

Gloucester City Homes conducts surveys regularly and periodically relating to our services in order to gauge satisfaction and make improvements based on feedback.

Gloucester City Homes operates a range of information and communications systems and technologies for efficient operation of the business. Personal information is stored and managed within those systems which are maintained to achieve a high level of Confidentiality, Integrity and Availability (CIA) including following best practice cyber security standards. We hold information in IT systems which may be copied for testing, backup, archiving and disaster recovery purposes. All our data is held within the UK, and is accommodated in an ISO27001 certified Data Centre.

Gloucester City Homes conducts a number of additional voluntary services including organising community events, providing debt advice, adapting the property you live in, selling properties and gathering information to improve our services. For these voluntary services, where your personal information is needed, we will always notify you about the service being offered, explain the service and obtain your consent to proceed, usually by way of a sign up / consent form for that service.

For the additional voluntary services, much of the information contained in our Privacy Notice is still relevant, such as details about Gloucester City Homes as the Data Controller, contact information for the Data Protection Officer and the rights you have under the legislation, including the right to withdraw your consent and the right to complain. You are invited to seek clarification on any point, and at any time via Gloucester City Homes Data Protection Officer.

## VISITORS TO OUR WEBSITES

When someone visits our website we will collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. We collect this information in a way which **does not identify anyone**. We do not make any attempt to find out the identities of those visiting our website ([www.gch.co.uk](http://www.gch.co.uk)). We will not associate any data gathered from this site with any personally identifying information from any source. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

## WEB SERVICES & THIRD PARTY WEBSITES

<https://www.gch.co.uk>

<https://www.lifelink.uk.com>

<https://www.shapethefutureglos.co.uk/>

Our website contains links to various third party websites. We are not responsible for the content or privacy practices of any external websites that are linked from this site. We do however take all reasonable steps to ensure that these websites support our activities and our stance on Data Protection. However when a user navigates away from our website(s) we are not responsible for any or all interaction that occurs.

**Facebook:** <https://business.facebook.com/gloscityhomes/>



We use this social media platform to aid better communicate, and information guidance with our tenants.

Facebooks Data Policy.

<https://www.facebook.com/privacy/explanation>

**Twitter:** <https://twitter.com/GlosCityHomes>



We use this social media platform to aid better communication, and information guidance with our tenants. However the Twitter platform focuses more on information about us as a corporate organisation.

Twitter's Privacy Policy

<https://twitter.com/en/privacy>

**LinkedIn:** <https://www.linkedin.com/company/gloucester-city-homes-limited>



We use this social media platform to aid better communication, and information about us as an organisation.

LinkedIn's Privacy Policy

<https://www.linkedin.com/legal/privacy-policy>

**Instagram:** <https://www.instagram.com/gloscityhomes/>



We use this social media to share general information or media about us as an organisation.

Instagram's Data Policy

[https://help.instagram.com/519522125107875?helpref=page\\_content](https://help.instagram.com/519522125107875?helpref=page_content)

**Youtube:** <https://www.youtube.com/user/GloucesterCityHomes>



We use this social media platform to host publically available media (videos and the like) for information and communication to all.

Youtube's Privacy Policy

<https://support.google.com/youtube/answer/7671399?hl=en-GB>

## GLOUCESTER CITY HOMES AND COOKIES

We use Google Analytics cookies (\_utma, \_utmb, \_utmc, \_utmz) to hold information about your visit to our site. We use this information to keep our site relevant and to make it easier to use. These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.

## MANAGING COOKIES

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>.

Note: Mobile devices can include mobile phones, smartphones, tablets and any other device that allows you internet access to websites.



## PEOPLE WHO EMAIL US

Any email sent to us will be reviewed and directed to the most appropriate person or department. Any attachments may be monitored and used by us for reasons of security and for monitoring compliance with our policies. Email monitoring or blocking software may also be used. Please be aware that you have a responsibility to ensure that any email you send to us is within the bounds of the law.

Our Data Retention Policy clearly states that we hold emails within our system for 3 years and then emails are deleted.

## CONFIDENTIALITY AND SECURITY

We do not give visitors to our website the option of using a secure transmission method to send us their personal information. We have implemented security policies, rules and technical measures to protect individual's personal information that we have under our control from:

- Unauthorised access
- Improper use or disclosure
- Unauthorised modification
- Unlawful destruction or accidental loss

All our employees and third party contractors who we engage with (data processors), who have access to, and are associated with the processing of your personal information, are obliged to respect the confidentiality and only process the information based on our instructions. We ensure that your personal information will not be disclosed unless we have obtained the correct consent and/or if we are required to by law.



## OTHER PEOPLE ACCESSING YOUR ACCOUNT.

Some tenants and residents for many reasons such as health, mental capacity, or just desire, request that others be able to interact, discuss and manage aspects of the tenancy or contract we hold together, with us on their behalf. With the changes that the GDPR requires, we have introduced a form to complete where authority can be issued to another person (support worker, friend, someone held in trust by the tenant, resident or contract holder) or organisation (a support agency)

Please contact Customer Services to request this form.

## WHAT INFORMATION DO WE COLLECT ABOUT YOU AND PEOPLE WHO MAY LIVE WITH YOU?

We collect the personal information that you may volunteer while using our services. We do not collect information about our visitors from other sources, such as public records or bodies, or private organisations. The personal information collected and purposes for which they are used are listed below.

We do not collect or use personal information for any purpose other than that indicated in our notification with the Information Commissioner Office. It is important to know that we require in some cases a disclosure about Criminal Convictions so that we are able to provide the right service to you, and to ensure the protection and safety of others. A criminal conviction does not automatically disqualify you from our service portfolio.

We also use your personal information for technical administration, research and development, customer administration and marketing. The some of the types of information we may collect as part of delivering you a service are:

### **Personal Information**

- Name
- Date of Birth
- National Insurance Numbers (where applicable)
- Address
- Contact details (telephone/mobile/email)
- Photograph or CCTV footage

### **Sensitive Personal Information**

- Racial or ethnic origin;
- Political opinions;
- Religious or other similar beliefs;
- Membership of trade unions;

- Physical or mental health or condition;
- Sexual life; and
- Convictions, proceedings and criminal acts

Primary personal information is collected for technical administration, research and development, customer administration. The type of marketing activities we may carry out are:

- Offering particular support services that we feel may be of interest or benefit
- Telling you about ways to be involved with giving feedback on services.

You can opt in and out of marketing by contacting us.

## HOW DO WE USE YOUR INFORMATION?

We will use your information to

- respond to your interest in our services,
- respond to any enquiries you make and
- to keep you updated with the latest news and information and closed linked products/services.

We collect and process personal and sensitive information about you for the provision of products, services, and account management and also to support your relationship with us, as a customer, supplier, board or tenant representatives or member of staff.

The personal information you provide will be used to update your records and will be securely stored in our computer and paper based filing systems. We will not collect information about you that is not needed and we will also ensure that the personal information you provide to us is updated on our systems in a timely and accurate manner.

Please do tell us if any of your circumstances change as this will help us to provide you with the best possible service in the future. Furthermore, we will regularly review your personal information and also make necessary changes to any service or information handling processes when you, the law or the Information Commissioner request such changes.

It is also important to know some important information about automated systems and profiling. As an organisation we do not use profiling but do use automation in some decision making processes.

We use an automated system to suggest Income (arrears) actions but the final decision is made by an Income Officer using other factors other than system suggested actions.

We use an automated system for Gas Servicing, in terms of the raising the job ticket, scheduling the work, and communication with the propriety occupier in relation to this important and legally required work.

## COMMUNICATIONS AND MARKETING

In today's society individuals are deluged with information and marketing material trying to communicate news, products and offerings. As a social landlord we are aware that many tenants and residents have additional needs and that circumstances change so does the need for additional support and services. We communicate with our customers in two main methods.

Our primary information communication system is focused to signpost supporting services and related products, services, and events linked directly with the contract you hold with us.

This may be community events in and around the tenancy address or type of tenancy property. Signposting to services that support independent living and emergency responses, news and important information about us as an organisation which holds the ownership of the property we share a relationship with. We as a social landlord, and in response to tenants' preference advertise properties to buy (moving from a rental tenancy) as this is an accepted goal of social housing provision and the social housing system. We as an organisation hold that we communicate under this theme under legitimate interests of business activity, in direct relation with the contract that is held between both parties.

We may from time to time engage in direct marketing activities, and will do so in a considered and thoughtful way, holding the principles of Data Protection close to the marketing activity's core purpose. Data Protection is a key consideration for us as an organisation in everything we do, and so the right to be removed from a "Marketing List" is easy and straight forward to complete. Please just contact the Data Protection Officer (email address: [dpo@gch.co.uk](mailto:dpo@gch.co.uk)) to process the Marketing List Removal Requests.

Marketing is by explicit consent under the GDPR, and so as an organisation we hold that direct marketing activities are carried out by consent, and so by the conditions and requirements of the Consent provisions under the GDPR

## HOW OUR CUSTOMER SERVICE CENTRE COLLECT YOUR INFORMATION

This information helps us to provide you with an efficient and effective service. When you contact us, we may ask you to provide us with some information so that we can be satisfied that you are who you say you are. We do this to protect you and to make sure that other people cannot find things out about you that they are not entitled to know. Anybody acting on your behalf may be asked to provide supporting information to indicate that you have agreed for them to do this.

## HOW DO WE SHARE YOUR INFORMATION WITH OR WITHOUT YOUR CONSENT?

We will not normally share your information without consent unless we are required to do so by law. We may share and provide specific, relevant but limited information with Law Enforcement Agencies, Government Agencies or Statutory/Public Bodies but only where there is a legal basis to do so. When we enter into inter-agency partnerships we will ensure a data sharing agreement is in place before any sharing takes place. We may also share relevant information with other third parties where we are legally obliged to with or without your consent. Some examples are:

- The prevention or detection of crime and fraud.
- The apprehension or prosecution of offenders.
- The assessment or collection of tax or duty owed to customs and excise.
- In connection with legal proceedings.
- In relation to the physical or mental health of an individual, where disclosure is required to protect them or others from serious harm.
- For research and statistical purposes.
- In connection with our obligations to governmental agencies and/or statutory authorities and our obligations we are required to comply with.
- In connection with our obligations to local governmental and/or local governmental agencies and/or statutory authorities and our obligations we are required to comply with.
- By providing your details to a supplier of infrastructure and or services for a contract that has signed between us and/or our agents as one party and you as the other party.

## HOW WE SHARE YOUR INFORMATION WITH OUR CONTRACTORS AND SUPPLIERS

There are some cases when we will share your information where it is necessary for legitimate business purposes relating to your tenancy or your contract of services with us. This will be to ensure that your needs are met and to also meet the health and safety obligations we have as an employer when delivering a service. This may include sharing information with other partnering organisations of **Gloucester City Homes Limited**, Contractors and Partners:

- In order to carry out or contractual obligations
- So that third parties can carry out our duties on our behalf
- To review and report back on the Repairs and Servicing side of our operations in relation to the service we provide.

An example of information sharing would be for the purposes of enabling our maintenance contractors to make appointments with you and arrange to attend your property to carry out repairs and/or services. We may also provide limited information to utility companies or other similar organisations related to your tenancy so that they can make suitable arrangements regarding payment for those services.

## ANTI-SOCIAL BEHAVIOUR MULTI-AGENCY APPROACH

Tackling anti-social behaviour requires robust information exchange between statutory and non-statutory agencies. We have agreed specific protocols for information sharing with Gloucestershire Police, Gloucestershire County Council and Gloucester City Council.

We will share information with other agencies where it is lawful to do so in order to help us to detect and prevent anti-social behaviour and to protect our communities. The type of information which might be shared includes, but is not limited to:

- The nature and location of incidents of anti-social behaviour
- Personal information as to complainants and witnesses
- Details of relevant visits to the property by agencies including the police
- Convictions, cautions, reprimands, bail conditions, progress of criminal cases

## HOW WE COLLECT AND PROCESS YOUR INFORMATION AS PART OF OUR RECRUITMENT PROCESS

If you submit an application to work for **Gloucester City Homes Limited** and our partner organisations we will use your personal information for the purpose of the application process and to produce and monitor recruitment statistics. References will not be taken up without your prior permission. We will not further share or disclose your information unless consent has been given or we are required to so by law.

Personal information relating to unsuccessful applicants will be retained for no longer than 12 months, to be used in the event of an appeals process. Statistical information may be produced to assist with recruitment analysis. Where required a Data Barring Service Check will be carried out and we will comply with the law and your rights when carrying out these checks.

If you are successful, our Human Resources department will maintain a file which will relate to your employment. This information will be maintained securely and only used for employment purposes. No disclosures will be made from the file without your consent or unless it is required by law. All retention requirements will be adhered to in relation to your personal information.

# RECUIRMENT PORTAL PRIVACY PRINCIPLES

## **Recruitment Portal Privacy Notice At the VERY Start of the Application.**

Gloucester City Homes Limited is committed to safeguarding the privacy of your information. By “your information” we mean any information about you, which you or third parties provide to us. If you as a candidate submit information to this Website, you agree to the use of such data in accordance with this privacy statement.

Our Privacy Principals, set out below, explain how your information will be treated.

### **Collection of Information**

We will only collect & use your information where we have lawful grounds and legitimate business reasons to do so.

We will be transparent in our dealings with you, and will tell you about how we will collect and use your information.

If we have collected your information for a particular purpose we will not use it for anything else unless you have been informed and where relevant your permission obtained

We will not ask for more information than we need for the purposes for which we are collecting it.

### **Maintenance of information**

We will update our records when you inform us that your details have changed

Candidates who choose to apply may access their profile, correct and update their details, withdraw their details or deactivate their account at any time.

### **Our Commitment to You**

We will observe the rights granted to you under applicable privacy and data protection laws and will ensure that queries relating to privacy issues are promptly and transparently dealt with.

We will ensure we have appropriate physical and technological security measures to protect your information regardless of where it is held.

We will ensure that when we outsource any processes we ensure the supplier has appropriate security measures in place and will contractually require them to comply with these Privacy Principles. This will only take place where it is needed to process your application.

We will only use the information you provide to us on these pages in order to process the relevant application and will not be used for marketing purposes.

### **Changes to our Recruitment Privacy Principals**

We reserve the right to modify or amend this privacy statement at any time and for any reason, any changes to our Recruitment Privacy Principals will be posted on this page so that you are always kept informed of the information we collect and how we use it. Nothing contained herein creates or is intended to create a contract or agreement between us and any user visiting the Website or providing identifying information of any kind.

### **Candidate Questions**

If you have any questions or concerns regarding your privacy while using this Website, please direct them to us by contacting the HR Department.

**Recruitment Portal Privacy Policy**  
**Check Box Agreeable Before final submission of Application.**

**Privacy Policy**

The following privacy statement explains how we protect visitors information gathered via this website and processed using our online recruitment software. If you as a visitor choose to submit information you agree to the use of such data in accordance with this privacy statement. We ensure generally accepted standards of technological security for the purpose of protecting information provided by visitors from misuse, loss or corruption. Only authorised personnel have access to personally identifiable information submitted through the website. Such employees are required to maintain the confidentiality of this sensitive data.

As defined by the General Data Protection Regulation (the GDPR) Gloucester City Homes, of Railway House, Bruton Way, Gloucester, GL1 1DG is the **Data Controller** and ultimately responsible for ensuring the data you provide is kept secure, processed correctly and that you understand your legal rights in relation to the data you provide. As part of our Data Controller responsibilities we have an assigned Data Protection Officer, who can be contacted at: [dpo@gch.co.uk](mailto:dpo@gch.co.uk)

Gloucester City Homes Data Protection Officer is the primary contact for all matters concerning data and privacy, and can assist in satisfying Subject Access Requests or to answer any questions you may have.

The recruitment software we use via this website is supplied by Net-Worx (2001) Ltd (trading as networkx) and they are defined as a **Data Processor** under the GDPR. They will only process your data in accordance with our instructions. The contact address of Networkx is: The Engine House, Wharfebank Business Centre, Ilkley Rd, Otley LS21 3JP.

The Data Protection Officer for networkx is **Rob Baker** and can be contacted at [dpo@networkxrecruitment.com](mailto:dpo@networkxrecruitment.com)

**What information do we collect from you?**

The recruitment software collects only personally identifiable information that is specifically and voluntarily provided by visitors. As part of the registration process, we may collect the following (but not limited to):

- Name, address, email, telephone number
- CV (where applicable)
- Answers to questions around your recruitment preferences
- Any other information you wish to provide in support of building up your candidate account, and to make an application of employment.

**Why do we collect this information (purpose)?**

As required by the GDPR we must only request information if we have a legal basis for doing so. You are agreeing to provide this information in order for us to form a contract that will allow us to use your details and information presented so that we may provide recruitment services to you and carry out statistical analysis. It is important to know that you are applying for employment which will be under a Contract of Employment. We consider that the lawful basis of processing is drawn from the Contract Principle of the GDPR.

**Who might we share your information with?**

Personal details you provide in this registration:

- Will be made available to us and our processors
- Will by preference be searchable on our candidate database
- Will allow you to optionally receive notifications on relevant jobs you are seeking
- Will be used for communication with you regarding recruitment
- Will be used for statistical analysis



Although we may provide visitors information to service providers that handle information on our behalf, we will not share the information with third parties for secondary or unrelated purposes unless otherwise disclosed at the point of collection and not without having gained acceptance at the point of collection.

#### **How long do we keep hold of your information?**

Your candidate account will be deactivated after 12 **months** of inactivity. You can deactivate your account at any time. At the same time as this, your data will be fully anonymised.

#### **How can I access the information you hold about me? Your rights**

We are dedicated to providing reasonable access to visitors who wish to review the personal information retained when they apply via our website site and correct any inaccuracies it may contain. Visitors who choose to register may access their profile, correct and update their details, or withdraw their details at any time. To do this, visitors can access their personal profile by using their secure login. In all cases we will treat requests to access information or change information in accordance with applicable legal requirements.

You have the following rights in relation to the way in which we deal with your personal data:

- the right of erasure or to be forgotten
- the right to rectification if information is inaccurate or out of date
- the right of data portability (to obtain and reuse your personal data)
- the right to object to network and the Controller and processors handling of your personal data
- the right to withdraw your consent with regards to the handling of your personal data
  - you have the right to ask for a copy of the information we hold about you (Subject Access Request - S.A.R)
- You have the right to lodge a complaint with a supervisory authority - the ICO

Within your candidate account, you can also use the Download Data feature to generate an XML file of the current data we hold on you that you have provided and/or have access to within the account.

Where you exercise your right to object or withdraw your consent we may process your personal data without your knowledge or consent where we are permitted or required by law or regulatory requirements to do so. In such a case, we will not process more personal data than is required under the circumstances.

If you are not satisfied by our actions, you can seek recourse through our internal complaints procedure. If you remain dissatisfied, you have the right to refer the matter to the Information Commissioner ([www.ico.org.uk](http://www.ico.org.uk)) or seek recourse through the courts.

#### **Information Security**

We have in place reasonable commercial standards of technology and operational security along with internal policies and procedures to protect all information provided by visitors and applicants from loss, misuse, alteration or destruction.

#### **Changes to our Privacy Policy**

We reserve the right to modify or amend this privacy statement at any time and for any reason, providing it maintains compliance with the General Data Protection Regulation (EU) 2016/679).

By ticking the box, you are agreeing to the terms in this privacy policy.

## YOUR RIGHTS

Please contact us first if you have a concern about anything relating to how we process your personal data. We will do everything we can to help you. You have the right to:

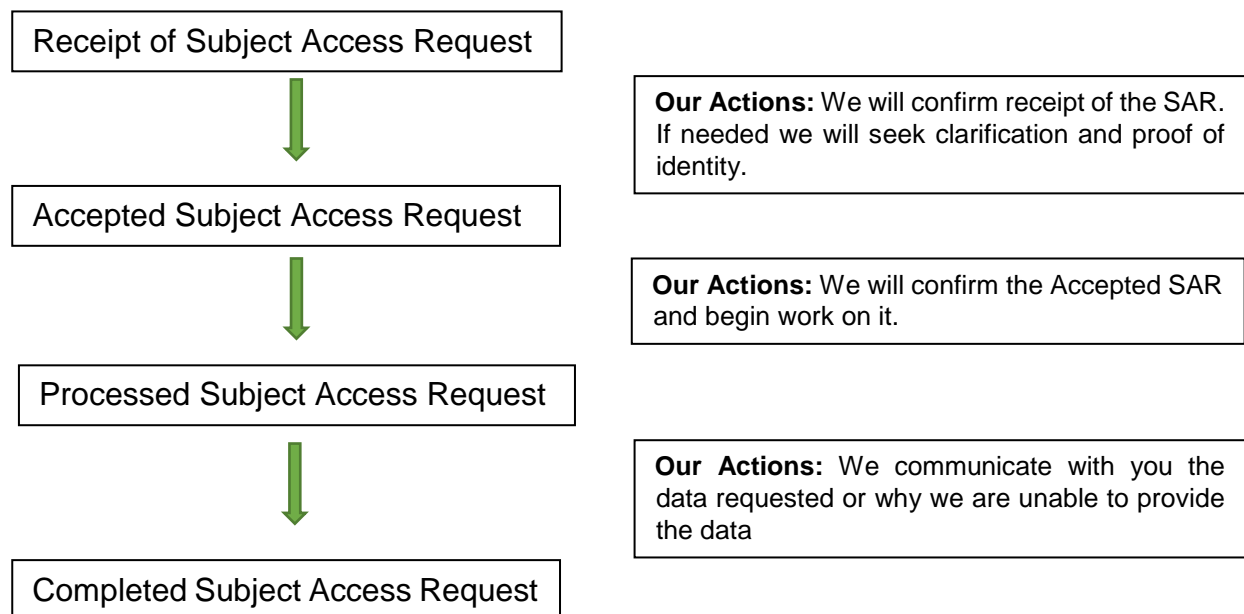
- Ask for a copy of your personal information
- Know how your personal information will be shared with and under what circumstance
- Know how to opt-out of promotional and/or direct marketing and automated decisions
- Challenge incorrect personal information and request for it to be amended
- Have inaccurate information rectified, blocked, erased or destroyed
- Complain to the Information Commissioner

## REQUESTING A COPY OF YOUR PERSONAL INFORMATION - SUBJECT ACCESS REQUEST

We will be as open and transparent as possible in relation to providing access to your personal information. Normal 'business as usual' information will be provided to you as part of the standard customer or employee relationship. Formal requests for personal data or information may be made by making a 'subject access request'. You can ask us whether we are keeping personal data about you by writing to our **Data Protection Officer** (see below or our contact page).

### **Our Subject Access Request has the following stages:**

- 1. Receipt of Subject Access Request.**
- 2. Accepted Subject Access Request.**
- 3. Processed Subject Access Request or Refused Subject Access Request**
- 4. Subject Access Request completed.**



### **1. Receipt of Subject Access Request**

Your Subject Access Request should clearly state what information you wish to have provided and please ensure that you have provided proof of identification. This is the receipt phase of the Subject Access Request, and we will acknowledge that we have received your request. Please ensure that you are detailed in your request, providing as much information as possible including time frames and periods in question. We are able to provide a Subject Access Request template form for you on request.

Under normal circumstances we will not levy a fee for providing this information. At this point of the process if the proof of identify is not sufficient or clarification is needed then a request will be made to you asking for acceptable identification or the clarification needed to continue your request. As an organisation we must ensure that the identity of the request matches the identity of the individual whose data is requested.

The time limit as defined by GDPR will not take effect until the application is accepted and defined as an Accepted Subject Access Request.

**If, and only if**, we view the Subject Access Request as manifestly unfounded or excessive, particularly repetitive or that there are additional copies of the Request Data required we are able to charge a fee to cover the administrative cost of providing the information. This will be advised to you in writing at this time.

## **2. Accepted Subject Access Request**

Once your identification has been confirmed and accepted, your Request will move to Accepted Request phase and we will notify you of this. Afterwards, and when complete we will provide you with a readable copy of the personal data which we keep about you. We will provide this within **one month** of the Accepted Request. In this time we will provide the information to you, or if we need more time, we will communicate this to you in good time, and copy in the Supervisory Authority (the Information Commissioners Officer (ICO)).

In all cases we will work to ensure that we have answered your request in a lawful manner, as an organisation we take pride in being open and transparent. We must however check that we do not disclose any information that is not appropriate or will cause the Rights of another Individual to be breached.

## **3. Processed Request or Refused Request**

Once the information has been gathered and checked against the other Rights and Provisions of appropriate laws and regulations we will send this information to you as you have requested.

**If however we are unable to provide you the information you have requested we will communicate this to you, along with the reason. We will also communicate this to the Supervisory Authority.**

**Additionally we may also offer an opportunity to discuss the reason for this non-disclosure from us. This is part of our open and transparent operating method and commitment.**

## **4. Subject Access Request completed.**

Once the Request is either Processed or Refused the request is completed. Normally we will take no further action on it itself. We do however reserve the right to review the request and our response for compliance reasons, and to see if the request has been managed in accordance with the Regulations and Provisions of the appropriate laws.

In line with advice from the ICO, we retain all Subject Access Request information for at least 3 months from the last meaningful communication. We record, monitor and report on Subject Access Requests.

## GLOUCESTER CITY HOMES DATA PROTECTION OFFICER

We are happy to provide the contact details of the Data Protection Officer for Gloucester City Homes charged with ensuring that we work within the principles and provisions of the relevant laws and the GDPR.

[DPO@gch.co.uk](mailto:DPO@gch.co.uk)

The GDPR Data Protection Officer  
Governance Team,  
Gloucester City Homes  
Railway House,  
Bruton Way,  
Gloucester  
GL1 1DG

## OUR SUPERVISORY AUTHORITY - THE INFORMATION COMMISSIONERS OFFICE (the ICO)

Gloucester City Homes is registered and operates in England, and so we have elected that our Supervisory Authority be the Information Commissioners Officer (the ICO). The ICO can be contacted by using the following information:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Telephone Number            0303 123 1113  
Website:                        <https://ico.org.uk/>

## CHANGES TO THIS PRIVACY NOTICE

We keep our privacy notice under regular review. It was last reviewed for 25<sup>th</sup> May 2018 to accommodate the introduction of the enforcement phase of the GDPR. This privacy notice is scheduled for review on 14<sup>th</sup> December 2018.

Please do keep informed on changes on how we use your information by checking this page for further information. We review this document, and perform a quality assurance exercise on this document once a year.