



Customer Privacy Notice

This Customer Privacy Notice provides you with information about:

- The personal data we collect
- How we use personal data
- Your rights relating to your personal data



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1. Introduction

Cartrefi Conwy is a 'Registered Social Landlord' with over 4,000 properties in ownership and management throughout the North Wales area. Our primary business objective is to provide and manage housing and related services to support people in need. In delivering such services Cartrefi Conwy will need to obtain, hold and process some personal information about the people we provide services to or work with (their personal data).

The use and disclosure of personal data is governed in the United Kingdom by the UK General Data Protection Regulation and UK Data Protection Act 2018. Cartrefi Conwy is the Data Controller and Cartrefi Conwy's Company Secretary is its representative registered with the Information Commissioner's Office (ICO) to act as a contact point for individuals and the Information Commissioner's Office (ICO) on matters related to data privacy. The Company Secretary will inform and advise colleagues on data protection obligations and monitor internal compliance, helping to ensure that we handle all personal data in accordance with the UK Data Protection laws.

We aim to be transparent about what data we collect about you and how we use it. This Customer Privacy Notice provides you with information about:

- how we use your data
- what personal data we collect
- how we ensure your privacy is maintained
- your legal rights relating to your personal data.

Maintaining the security of your data is a priority at Cartrefi Conwy, and we are committed to respecting your privacy rights. We will ensure that we and those we work with only process your personal data in line with our legitimate interests and we pledge to handle your data fairly and lawfully at all times.

2. Lawful bases and purposes for processing personal data

Generally Cartrefi Conwy will process personal data:

- to enable us to meet a legal obligation and to comply with the law
- in relation to a contract we have with an individual, or because we must take specific steps before entering a contract
- to carry out our legitimate interests or interests of a third party in relation to our business activities
- to protect someone's life (a vital interest)
- to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law, for example in relation to our statutory and regulatory obligations as a Registered Social Landlord.

Most of the time we won't need your consent to process your personal data as we will be using it to fulfil our obligations and exercise our rights as listed above. In relation to these matters you are obliged to provide the personal data we require and failure to do so may affect how we can support you with your housing needs and whether we can provide services to you.

We may process your personal data for the purposes set out in [Appendix A](#)

In limited circumstances we may ask for your specific consent to process your information. When specific consent is requested, we will explain why we are asking for this and the process for withdrawing that consent if given.

3. Whose personal data do we handle?

We only process personal data where there is good reason to, so that we can carry out our work as a social landlord and for the purposes broadly described in Section 2.

We may process personal data relating to a wide variety of individuals including the following:

- Our employees including their family and other designated contacts, volunteers, agency, temporary and casual workers
- Tenants, their carers, family, and other designated contacts
- Applicants for accommodation, their families, and other designated contacts
- Asylum seekers
- Travellers
- Board and committee members and shareholders
- Business associates and their employees or representatives
- Landlords
- Local authority employees
- Probation officers
- Social workers
- Officers of law enforcement and emergency services
- Spiritual and welfare advisers
- Consultants and professional advisers
- Survey respondents
- Offenders and suspected offenders
- Complainants, enquirers and witnesses
- Suppliers and service providers, self-employed contractors
- People captured in photographs, video, film and CCTV images

4. What types of personal data do we handle?

We only handle personal data that is relevant to our work in carrying out the purposes in Section 2 above. We may process personal data relating to or consisting of the following:

- personal details such as name, address, contact details, date of birth, language preferences
- financial details
- education and employment details
- lifestyle, behaviour and social circumstances
- special categories of data which relate to your personal appearance, health, welfare, safety and security. These may include medical conditions, race or ethnicity, religious beliefs, sexual orientation and political opinions, criminal convictions and offences.
- goods and services supplied or requested
- supplier details
- compliments, concerns, and complaints, views and opinions about services received
- visual images and voice recordings in a range of formats (including for example, photographs, film, digital media, CCTV, telephone, social media, virtual meetings)

5. Where we get personal data from

In order to carry out the purposes described in section 2 above, we may obtain personal data from a wide variety of sources, including the following:

- you personally (as the data subject)
- current, past, or prospective employers and work colleagues
- family, carers, associates, and representatives of the person whose personal data we are processing
- educators and examining bodies
- suppliers and service providers
- financial organisations and personal financial advisers
- local and central government departments
- survey and research organisations
- other housing associations or trusts and other landlords
- trade unions and associations
- health practitioners, health authorities, health and social welfare organisations
- enquirers and complainants
- the police and other law enforcement agencies, security organisations
- professional bodies, professional advisers and consultants
- charities and voluntary organisations

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- probation services, courts and tribunals
- employment and recruitment agencies
- credit reference and debt collection agencies
- our own telephone, digital media and CCTV recording systems
- correspondence (by letter and email),
- information available publicly (such as articles featured in newspapers, magazines, websites, business publicity, social media sites)

6. How we handle personal data

We have processes in place to make sure personal data is handled securely and lawfully. These cover the information we handle internally as well as how we share information with other relevant organisations.

When handling personal data, we will:

- tell you why we need your information and what we will use it for
- only use your personal information for what we have said we will use it for
- only keep what we need to provide services to you
- keep only the personal information we need in relation to legal, regulatory and contractual obligations
- aim to make sure your personal information is accurate and up to date
- delete or destroy personal information about you when we no longer need it, using our procedures for keeping and deleting information.
- Cartrefi Conwy does not rely on automated decision making based on personal data.

7. Who we share personal data with

In order to carry out our legitimate business interests we may disclose personal data to individuals and organisations in the following categories:

- Other Housing Associations and charitable organisations providing housing or support services for those in need,
- Private landlords and their managing agents
- Local Authorities (primarily to support those at risk of becoming, or who are homeless, and claimants eligible to benefits administered by the local authority),
- Care, Welfare and Health providers and agencies,
- Utility companies (such as gas, electricity and water suppliers)
- Emergency services (Fire & Rescue, Police, Ambulance)
- Police and other law enforcement agencies,
- Our subsidiary company Creating Enterprise, where working on our behalf
- Partner organisations, agencies, contractors, suppliers, and specialist advisers, working with us or on our behalf as individuals or organisations.

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We may also disclose personal data to other bodies or individuals where we believe an individual is at risk of abuse, neglect or harm.

We will also disclose personal data to other organisations, authorities or individuals when required to do so by, or under, any act of legislation, by any rule of law, and by court order. This may include disclosures to the Child Support Agency, the National Fraud Initiative, the Home Office and to the Courts.

Where organisations, authorities or individuals to whom we may need to disclose personal data process that data in territories outside of the United Kingdom we will take proper steps to ensure that it is adequately protected as required by Data Protection law.

Should you decide to engage in one of our online activities and we are using Zoom, you will need to sign up to the zoom service, and for your use of their service, Zoom will be the data controller. You can find the zoom privacy information here at: <https://zoom.us/privacy>. You will also need to agree to their terms and conditions <https://zoom.us/terms>. You should be aware that Zoom processes information in the United States of America.

8. How long do we hold personal data?

We will keep personal data for only as long as we need it.

Personal information which is placed on the Housing Management system and other records containing personal data relating more generally to the activities of Cartrefi Conwy will ordinarily not be held for longer than 7 years after:

- the date of an offer of a tenancy or issue of a rejection letter relating to an application for housing
- the date of termination of a tenancy or lease
- the end of any other contractual arrangement with you
- financial transactions have been processed

These retention periods may be varied from time to time relevant to the needs of the business or to comply with other timescales in accordance with statutory or regulatory requirements. When we destroy or delete information we will do so securely.

9. Individual rights

You have various rights in respect of the personal data we hold about you – these are set out in more detail below:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object to processing
- The right to withdraw consent
- Rights in relation to automated decision making and profiling.

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9.1 The right to be informed

You have the right to be informed about the collection and use of your personal data. This Customer Privacy Policy may be regarded as a generic 'Privacy Notice' for tenants and other customers of Cartrefi Conwy. It will be published on our website www.cartreficonwy.org and in an alternative printed format for ease of use and communication in other circumstances. From time to time we may publish additional privacy notices relating to other specific activities and these will be published as appropriate, for example on forms, email footers, or CCTV signage.

9.2 The right of access

You have the right to access your personal data; this is commonly referred to as subject access. You can make a subject access request verbally or in writing and we will have one month to respond to a subject access request.

9.3 Right to rectification

You have the right to have inaccurate personal data rectified or completed if it is incomplete. You can make a request for rectification verbally or in writing and we have one calendar month to respond to a request.

9.4 Right to erasure

You have the right to have your personal data erased however the right is not absolute and only applies in certain circumstances. The right to erasure is also known as 'the right to be forgotten'. You can make a request for erasure verbally or in writing and we have one month to respond to a request.

9.5 Right to restrict processing

You have the right to request the restriction or suppression of your personal data however this is not an absolute right and only applies in certain circumstances. When processing is restricted, we are permitted to store the personal data, but not use it. You can make a request for restriction verbally or in writing and we have one calendar month to respond to a request.

9.6 Right to portability of their data

The right to data portability entitles you to receive a copy of your personal data and/or have your personal data transmitted from us, as the data controller, to another data controller. The right to data portability only applies to data you have provided to us, where the processing is being carried out on the basis of consent or a contract with you.

9.7 The right to object

Subject to certain exemptions, you have the right to object to the processing of your personal data in certain circumstances. This request can be in writing or verbally and we have one calendar month to respond. This includes using your personal data for direct marketing purposes and covers communication by any means (e.g. mail, email, telephone, door-to-door canvassing) of any advertising or marketing material directed at particular individuals.

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9.8 The right to withdraw consent

Where you have been asked to give your specific consent for processing of your personal data and that consent is the lawful basis for processing, you can withdraw your consent at any time.

9.9 Rights in relation to automated decision-making

Subject to certain exemptions, you have the right to require that we ensure no decision that would significantly affect you is taken by us or on our behalf purely using automated decision-making software. If there is a human element involved in the decision-making the right does not apply.

10. Monitoring

We may monitor or record and retain telephone or video calls, texts, emails, social media messages, virtual meetings and other electronic communications received and sent in order to assist the purposes described under section 2 above. We do not place a standard pre-recorded 'fair processing notice' on all telephone lines because of the inconvenience that may be caused through the delay in response to the call.

11. Contact us

If you have any queries or concerns about the quality (accuracy, relevance, non-excessiveness etc.) of your personal data or the way your personal data is handled by Cartrefi Conwy, you are encouraged to raise them with us. You can do this by contacting:

The Company Secretary, Cartrefi Conwy,
Morfa Gele, North Wales Business Park, Cae Eithin, Abergele LL22 8LJ
Tel: 0300 124 0040 Email: enquiries@cartreficonwy.org

12. Contact the information commissioner

The Information Commissioner is the independent regulator responsible for enforcing Data Protection law in the UK. Its office in Cardiff provides a local point of contact for members of the public and organisations based in Wales. Any individual can ask the Information Commissioner to make an assessment if they believe that they are/have been adversely affected by our handling of personal data. Such requests should be made direct to the Information Commissioner whose contact details can be found below.

Information Commissioner's Office – Wales: 2nd Floor, Churchill House, Churchill Way, Cardiff, CF10 2HH Telephone: 016 2554 5297 Email: wales@ico.org.uk
or alternatively,

The Information Commissioner's Office, Wycliffe House, Wilmslow, Cheshire, SK9 5AF
Telephone: 0303 123 1113 Website: www.ico.gov.uk

APPENDIX A

Purpose of processing your personal data	Legal basis for processing
To comply with our legal and regulatory obligations	Legitimate interest in being a social landlord and regulated as such by the Welsh Government
Letting, renting and leasing properties	Legitimate interest in being a social landlord and meeting or enforcing contractual agreements with tenants
Administering housing waiting lists	Legitimate interests of those seeking accommodation and of the various organisations tasked with providing social housing
Providing housing advice and support and associated welfare services, advice, and support	Legitimate interest of those seeking support and of the various organisations tasked with providing such support
Researching and understanding the behaviour, activities, preferences and needs of our tenants and other residents in our local communities and areas of operation	Legitimate interests of ours in respect of planning our services and resources
Preventing, investigating, and detecting crime, fraud or anti-social behaviour and prosecuting offenders, including working with law enforcement agencies	Legitimate interests of ours, our tenants, and law enforcement agencies and the substantial public interest of maintaining law and order
Handling individual contacts, enquiries, complaints, or disputes	Legitimate interest of ours and others in handling complaints etc.
Managing insurance claims by tenants and members of the public	Legitimate interest of ours relating to statutory and contractual obligations and management of related risk

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Purpose of processing your personal data	Legal basis for processing
Effectively handling any legal claims or regulatory enforcement actions taken against Cartrefi Conwy	Legitimate interest of ours in relation to meeting our statutory, regulatory and contractual obligations and protect our business interests
Protecting Cartrefi Conwy, its employees and tenants, by taking appropriate legal action against third parties who have committed criminal acts or who are in breach of legal obligations to Cartrefi Conwy	Legitimate interest of ours in relation to the prevention and detection of crime and pursuit of our contractual and legal obligations
Administering housing and property grants	Legitimate interest of ours in relation to meeting terms and conditions attached to such grants
Planning for and carrying out maintenance, repair and refurbishment works on properties we own or are contracted to work on for others	Legitimate interest of ours to meet our statutory obligations as a social landlord and contractual agreements with tenants and others
Acquiring, developing, selling or transferring any property or land	Legitimate interest of ours to pursue our objectives as a social landlord and meet contractual agreements, statutory and regulatory obligations
Promoting, advertising and marketing our work	Legitimate interest of ours to pursue our objectives as a social landlord
Managing corporate transactions, including selling or transferring any parts of our business to third parties, acquiring new businesses, entering into mergers or undertaking corporate restructuring activity.	Legitimate interest of ours to pursue our objectives as a social landlord and protect our business interests
Communicating in ways that are relevant and tailored to individuals.	Legitimate interest of ours to pursue our objectives as a social landlord and meet regulatory obligations

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Purpose of processing your personal data	Legal Basis for processing
Sometimes we may communicate by means of a virtual interview, meeting, workshop, social activity or focus group. We may record (digitally, film and audio) these events and any contributions made by the attendees. We remain the data controller for the recorded information and may use it in relation to the subject of the event and for the purposes listed above.	Legitimate interest of ours to pursue our objectives as a social landlord and protect our business interests