



## Protecting your privacy

VIVID Housing Limited is registered in England and Wales as a registered society under the Co-operative and Community Benefit Societies Act 2014 under number 7544 with exempt charity status and as a registered provider of social housing with the Homes and Communities Agency under number 4850. Our registered office is at Peninsular House, Wharf Road, Portsmouth, Hampshire, PO2 8HB.

We are registered as a data controller with the Information Commissioner's Office with registration number ZA248321.

We're committed to protecting your privacy by storing your data securely and handling it appropriately.

This notice is designed to tell you what data we collect, why we collect it, what we use it for and if we share it with anyone else.

### Your Rights:

- we'll keep you informed on how your data is used
- you can ask to see the personal information we hold about you.
- you can have personal information corrected if it is not accurate or complete.
- you can ask us to delete personal data where there's no reason for us to keep using it.
- you can limit the way that we use your data
- you can change your mind and withdraw consent for us to use your data.
- you can ask us to send you your personal data should you want to reuse it for anything else.
- you also have rights in relation to automated decision-making (including profiling). This is when decisions are made automatically without any human involvement. You can ask someone to review the decision or to know how it's been made.
- you can object to us processing your personal data for direct marketing.

We'll support these rights unless there's a good reason for us to keep hold of your data and continue to use. We'll let you know the reasons why

## **Applying to rent or buy a property from us**

### **When you apply to rent a home or garage from us, we'll ask for:**

- your full name and proof of identity
- your date of birth
- your email address and phone number
- your national insurance number
- your address
- your salary and employment details
- outgoing money details e.g. bills
- details of previous debts and loans
- the name of anyone authorised to act on your behalf
- names and dates of birth for others within your home
- your bank details
- information about your previous tenancies, including anti-social behaviour issues and rent arrears
- any language needs e.g. if English isn't your first language
- tax and benefit details
- any disability needs
- information on your savings

### **We collect and process this information so that we can:**

- assess your eligibility to rent or buy a home or garage from us and decide whether to offer you a tenancy
- contact you to arrange viewings
- contact you to discuss the details you've provided
- communicate with you in an appropriate way and deliver you the best service
- set up your account for all future communications and collect payments for rent and service charges
- contact you about your application, during the sales process and once you become a leaseholder
- assess your eligibility and affordability for a mortgage and your credit worthiness. This is to make sure we allocate properties in line with our regulator's guidance and our policy
- confirm your identity, residence details and source of deposit so our solicitors can complete legal paperwork and the requirements to purchase a property
- determine the progress and timeframes for the sale of any existing property you own
- adapt our services to meet your needs

### **Sometimes we'll need to share your data. Here's who we'll share it with and why:**

- credit check agencies: to assess your eligibility to rent a home or garage from us
- references from previous landlords to ensure you're a suitable applicant to rent a home from us
- we may share your details with the police if we believe that a crime is taking place
- third party estate agencies; to market and sell our properties. These agencies will not share your data with other companies and will only use your information to assist you with buying a home from us
- our panel mortgage advisors and your mortgage advisor/provider; to determine your eligibility and affordability to obtain a mortgage under our regulator guidance
- local authorities: we may need confirmation on who we can allocate a property to if there's a specific planning condition that must be met e.g. local applicants take priority
- our solicitors; to draft and complete details for all legal documents and processes in relation to your purchase. They will also use the details you provide to contact your solicitor to start the sale conveyancing process
- your solicitor for updates and to assist with your sale
- mortgage advisor/lender; for updates and to assist your mortgage progressing
- surveyors instructed by your mortgage lender to value the property you're buying
- Help to Buy Agent; we'll record details about you and your purchase on your Help to Buy application

## **Living in a VIVID Home**

### **When you're our customer, we collect the following data:**

- your email addresses and phone numbers
- the names and dates of birth of any other people living in your home
- payments made by you and details of any arrears
- any contact or correspondence that you've had with us
- any health issues and disabilities
- we may take photographs or film events that we host which you'll be invited to, you will be informed of this.
- ethnicity
- nationality
- sex

### **We collect and process this information, so we can:**

- make sure that the details we have for you are accurate and up to date
- understand any vulnerabilities and needs you have, so we can adapt our services where necessary

- provide you with any advice and support you may need with claiming benefits, budgeting, improving your skills and being able to live independently in your home
- provide repairs and maintenance services in line with our landlord health and safety responsibilities
- collect photos, videos, news stories and case studies which allow us to promote our work; we'll ask for your consent before doing so.
- ask you for feedback and carry out surveys to improve our services; this can be by a variety of contact methods such as email, telephone, text and/or face to face
- protect our staff and contractors by placing a "flag" over your tenancy if we consider you to be a risk to staff – we'll let you know about this
- record sale details with the government appointed Help to Buy Agency and CORE (COntinuous REcording of Social Housing lettings and sales) for government research and statistical purposes

**Sometimes we'll need to share your data. Here's who we'll share it with and why:**

- external agencies who manage utilities in your home on our behalf
- the relevant local authorities to support their services to you
- we share contact details with external companies who carry out surveys for us, in the interest of our customers. Most commonly used are Rant & Rave and TLF Research
- contractors who carry out repairs and services on our behalf
- tenancy support services
- CORE (COntinuous REcording of Social Housing lettings and sales); we'll record details about you and your purchase within the CORE system. You'll receive more information in CORE's privacy notice
- we may share your details with the police if we believe that a crime is taking place
- professional advisers e.g. lawyers or insurers
- our regulators
- our IT systems suppliers, for legitimate business use, to keep our systems safe to protect data
- external mailing providers to send you correspondence on our behalf

**Working at VIVID**

**The information we collect and hold**

We may collect the following information during your employment:

- your name, contact details and date of birth
- emergency contacts name, relationship and contact details

- a copy of your driving license and passport
- your nationality and immigration status and information from related documents
- a photograph of you
- your CV, application form and other information collected during the recruitment process
- your salary and benefits information, including your bank details, national insurance number and tax information
- details of your spouse/partner and any dependants
- details of your pension arrangements and the information included in these
- information in your sickness and absence records (including sensitive personal information regarding your physical and/or mental health, doctor's notes and occupational health reports)
- your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs
- criminal records information, including the results of Disclosure and Barring Service (DBS) checks
- employee records including grievances, conduct, disciplinary issues, training and performance management
- details of your work schedule and time and attendance records
- information in applications you make for other positions within VIVID, or in relation to succession planning and promotion
- information about your use of our IT, communication and other systems, and other monitoring information
- details of your use of business-related social media, such as LinkedIn and Twitter
- your IP address
- details in references and mortgage applications about you that we give to others

### **How we collect the information**

We may collect this information from:

- you and your personnel records,
- the Home Office, pension administrators, insurance administrators and the DBS via a third party,
- your doctors and from medical and occupational health professionals we engage,
- from our benefit and training providers,
- from your trade unions and other employees,
- from other professionals we may engage e.g. to advise us generally and/or in relation to any grievance, performance matter for example,

- from automated monitoring of our websites and other technical systems, such as our computer networks and connections, communications systems, remote access systems, email and instant messaging systems, intranet and Internet facilities, telephones, voicemail, mobile phone records, data loss prevention systems and firewalls.

### **How we may share the information**

We may also need to share some of the above categories of personal information with other parties, including:

- professional advisers e.g. lawyers or insurers
- benefit providers
- occupational health
- pension providers
- potential purchasers of some or all of our business or on restructuring
- our regulators
- banks
- The Disclosure and Barring Service
- we may share your details with the police if we believe that a crime is taking place
- our IT systems suppliers, for legitimate business use, to keep our systems safe to protect data
- external mailing providers to send you correspondence on our behalf

It may be necessary to share some personal information with internal teams to achieve this.

Usually, information will be anonymised, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

### **Using our online services**

**When you use our online services, we collect the following data:**

- the date and time you used our services
- the pages you visited on our website and how long you visited them for
- internet browser and devices, you're using
- your country, city and language
- website address from which you accessed our website
- details collected through forms filled in when you contact us online

- surveys and polls about the website
- if you're a new or returning visitor

**We collect this information, so we can:**

- tailor our services to you
- improve your online experience
- detect possible fraud
- provide services to you, for example: reporting a repair, dealing with rent arrears and unpaid bills, etc.
- assist the police in solving crime and investigating anti-social behaviour
- monitor performance and troubleshooting service issues

## **Video conferencing and videos**

We may record some of our video conferences to improve our services, for translation purposes and to promote messages to our staff and customers. We may also record meetings, so everyone remembers what was discussed and agreed. We'll do this only with your consent and the recordings will be stored in line with our retention schedule.

## **Chat bot**

Chat bot is an automated service which can give you answers or help signpost you to information without the need to email. It's the blue Ask Us button on our website and intranet.

If chat bot can't answer your question it'll take your details and make sure someone gets back to you.

The questions you ask will support us to improve Chat Bot and we'll keep the information you provide to chat bot in line with our retention schedule.

The chat bot chat history is stored by our third party supplier CX company but is deleted 15 minutes of inactivity (when the session ends). They do not save or store this data.

## **Call recordings**

Some phone calls made to and from our customer experience team are recorded, these recordings are kept for 90 days. We use call recordings for internal training, to investigate complaints and we may also use them as evidence in a court case.

## **CCTV**

Some of our locations and offices have CCTV and you may be recorded when you visit them. We use CCTV to provide security and protect our staff and visitors.

CCTV is only viewed by staff when necessary, the footage is stored for a specific period, after which it is recorded over. We may view or share CCTV to investigate a complaint or antisocial behaviour including with the police to prevent and detect a crime. We may also share CCTV for evidence in an insurance claim or court case.

## **The lawful bases for which we process your data**

We process all of the above with the following legal bases:

- **Contract:** the processing is necessary for a contract we have with you, or because you have asked us to take specific steps before entering a contract
- **Legal obligation:** the processing is necessary for us to comply with the law
- **Legitimate interests:** the processing is necessary for our legitimate interests, or the legitimate interests of a third party unless there is a good reason to protect your personal data which overrides those legitimate interests.
- **Public interest:** we process the data to carry out a task of public interest.
- **Consent:** you have given us clear consent to process your personal data for a specific purpose
- **Vital Interest:** the processing is necessary to protect someone's life.

## **Security of your data**

The security of your data is very important to us. We have appropriate organisational and technical measures in place to protect your data.

We have comprehensive policies and procedures around information security and data protection, which support us with minimising the risk of unauthorised access or disclosure of your data.

Our employees are required to complete mandatory data protection training annually.

When working with third parties we ensure we have appropriate agreements in place to ensure the protection of your data. We will only share data that is absolutely necessary for the purpose intended. We do not sell your personal information.



## **How long do we keep your data?**

We regularly check that contact details are up to date and accurate when we're in contact with our customers.

If you think we need to update any of the information we hold, please let us know.

If you are a customer, some details can be updated using your online account.

We will keep your information for as long as it is relevant to the purposes set out above and in line with our retention schedule. We may therefore continue to hold information about you after you leave your home or no longer receive services from us, where this is still relevant. We may also be required to keep your information for legal reasons.

We will take steps to keep the information safe while we hold it and when we do not need it any more, we will destroy it safely.

## **Website cookies**

Cookies are very small files that are placed on your computer by the websites you visit. They're common and used to make websites work more efficiently, provide a customised experience and send information back to the owners of the site. For more information on how we use website cookies, please visit [www.vividhomes.co.uk/cookies](http://www.vividhomes.co.uk/cookies).

## **How to contact us about your data**

If you have any concerns or wish to express any of the above rights, please tell us and we'll respond as soon as we can. You can contact our Information Governance Manager - Lauren Cannon by emailing [customer@vividhomes.co.uk](mailto:customer@vividhomes.co.uk) or by calling 0800 652 0898.

The Information Commissioner's Office (ICO) provides lots of advice on your rights and protecting your data which you can find at <https://ico.org.uk> or call 0303 123 1113. You also have the right to lodge a complaint with the ICO.