



## Privacy notice- Newbuild Shared Ownership

VIVID (which includes all of our subsidiaries) collects and uses personal data about you for many business reasons. This can include some personal information which is subject to the Data Protection Act.

We know it's important we look after it well. And we're committed to protecting you by safely and securely using and storing it the right way.

Below is information about our approach to data protection and how to get in touch.

This privacy notice is supported by our privacy statement which can be found on our website at [www.vividhomes.co.uk/privacy-notice](http://www.vividhomes.co.uk/privacy-notice)

## Our approach to data protection

### We collect and process your data so that we can:

- Market and sell newbuild shared ownership properties.
- Contact you about your application, through the sales process and once you become a leaseholder.
- Assess your eligibility\*, affordability/sustainability, ability to obtain a mortgage & credit worthiness to ensure we allocate properties in line with our regulator guidance and our policy\*.
- Confirm your identity, residence details and source of deposit to enable our solicitors to complete legal paperwork and requirements to purchase a property.
- Determine the progress and timeframes for the sale of any existing property you currently own.
- Enable us to meet all legal requirements during the sale conveyancing process.
- As a basis to set up an account for all future enquiries & collect payments for rent and service/estate charges.
- Record sale details within VIVID, and with the government appointed Help to Buy Agency and CORE (COntinuous REcording of Social Housing lettings and Sales) for government research and statistical purposes and the relevant local authority.

### \*Automated decisions made at application stage:

- Please note, our "online" application includes a section which makes automated decisions. This means if you don't meet the initial eligibility criteria, you won't be able to submit an "online" application to us. If you wish to have the automated decision reviewed, you can contact us at [sales@vividhomes.co.uk](mailto:sales@vividhomes.co.uk) under your rights relating to automated decisions.

We'll typically collect and use this information for the purposes listed above (other purposes that may also apply are explained in our Information Asset Register and our Data Protection Policy).

If you provide us with the personal details of someone else, please make sure you have their permission.

**The legal reasons we use your data are:**

- You have given us your consent to process your personal data for a specific purpose.
- Processing is necessary for the performance of a contract to which you are party.
- Processing is necessary for compliance with a legal obligation.
- Processing is necessary for the purposes of VIVID's legitimate interests.

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

When you register your interest for a property:

- 3rd party estate agencies – we work closely with a company called Property Eagle who assist us to market & sell VIVID newbuild shared ownership properties. They will not share your data with other companies and will only use your information to assist you with buying a VIVID home. If you no longer wish to receive marketing from VIVID/Property Eagle you can opt out or change your preferences anytime by contacting us at [sales@vividhomes.co.uk](mailto:sales@vividhomes.co.uk)

When we have received your application:

- Our panel mortgage advisors and your mortgage advisor/provider- to determine your eligibility, affordability/sustainability under our regulator (Homes England) guidance and your ability to obtain a mortgage. VIVID staff are not credit advisors and therefore require the assistance of panel mortgage advisors to determine this.
- Local Authorities- we may need their confirmation on who we can allocate a property to if there is a specific planning condition that must be met, e.g. where local applicants take priority.

After we have offered you a property:

- VIVID solicitors- to draft and complete details for all legal documents and processes relating 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 your sale progressing.
- Mortgage advisor/lender- for updates and to assist your mortgage progressing.
- Surveyors instructed by your mortgage lender- to value the property you are purchasing.
- Estate Agents- to contact you if they are completing viewings on our behalf or for updates if they introduced you to VIVID.
- Other VIVID teams- we will use your data to set up your account for all future enquiries/services with VIVID; for example, payment of your rent and service/estate charges or reporting defects/repairs, which may require us to share your details with 3<sup>rd</sup> party contractors. We will also record the sales details for statistical information, which we may share with other areas of VIVID.
- Help to Buy Agent- we will record details about you and your purchase on your Help to Buy application (as required by our regulator).
- CORE- we will record details about you and your purchase within the CORE system (COntinuous REcording of Social Housing lettings and Sales). You will receive more information in CORE's privacy notice during the sale process.
- Local Authorities- we may advise them of details about you and your purchase to show we have followed a planning condition, or to assist with local councillor enquiries.

## **Security**

We're committed to making sure your data is secure. To help prevent it being accessed by anyone who shouldn't see it, we've put in place suitable physical, electronic and managerial procedures to look after it and keep it secure.

## **Controlling your personal information:**

- You may ask to see the details of personal information we hold about you. This means you're allowed know, and approve, the conditions for processing your information
- You have the right to have personal information corrected if it is not accurate or complete
- You have 'the right to erasure' (also known as 'the right to be forgotten'). This means you're allowed to ask us to delete or remove personal data where there's no convincing reason for us to keep using it
- You have the 'right to restrict processing'. Which means you can limit the way we use your data
- You have the 'right to data portability'. Which means you can ask for your personal data should want to reuse it for anything else
- You have rights related to automated decision-making (include profiling). Which is the way decisions are made automatically without any human involvement
- You have the right to withdraw consent where this has been given. Which means you can ask us to stop storing and using your data, should you change your mind

We'll accept your requests whenever we can but on occasion we may have good reason to keep hold of the data and continue to use it. This can be for legal reasons, such as using it as evidence in a court case, for example. Every request will be reviewed by our data protection officer to decide the most suitable course of action.

If you have previously consented to us using your personal data, then we'll ensure your rights are complied with.

We'll never sell, distribute or lease your personal information to third parties, unless we have your permission or are required by law. We may use your personal information to monitor performance of our services, such as using cookies on our website.

If you believe any information we're holding on you is incorrect or incomplete, please tell us as soon as possible using the address below – we'll respond as soon as we can.

## **How to make a complaint:**

Contact our Data Protection Officer at [governance@vividhomes.co.uk](mailto:governance@vividhomes.co.uk) if you have a question or concerned about the use of your information and we'll do our best to resolve the matter for you. If not, you can contact the Information Commissioner at [ico.org.uk/concerns](https://ico.org.uk/concerns) or call 0303 123 1113 for more information about your rights and how to make a formal complaint.

## **Changes to this privacy notice**

We reserve the right to update this privacy notice at any time. We may also let you know in other ways about how we process your personal information.

**Who we are and our address:**

Our legal name is VIVID Housing Limited (VHL). VHL 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 PO2 8HB.

VHL incorporates the following subsidiaries:

- VIVID Build Limited Registered office: Peninsular House, Wharf Road, Portsmouth, Hampshire, PO2 8HB. Company number: 7930319
- Vestal Developments Limited Registered office: 56 Kingsclere Road, Basingstoke, Hampshire, RG21 6XG. Company number: 05509078

VIVID Housing Limited is corporate trustee of the following charities:

- Hilda Ruth Daley Trust Registered office: Peninsular House, Wharf Road, Portsmouth, Hampshire, PO2 8HB. Charity number: 1052875
- The Paddon Memorial Charities Registered office: Peninsular House, Wharf Road, Portsmouth, Hampshire, PO2 8HB. Charity number: 229547

**Our head office address is:**

Peninsular House, Wharf Road, Portsmouth PO2 8HB

**Our phone number is:**

0800 652 0898

To contact our data protection officer, please either call us or email:

[governance@vividhomes.co.uk](mailto:governance@vividhomes.co.uk)