



## **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. We have exempt charity status and are a registered provider of social housing with the Regulator of Social Housing under number 4850. Our registered office is at Peninsular House, Wharf Road, Portsmouth, Hampshire, PO2 8HB.

We're 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 information securely and handling it appropriately.

This notice is in accordance with all relevant data protection legislation and is designed to tell you what information we collect, why we collect it, what we use it for and if we share it with anyone else.

### **Your rights:**

- we'll let you know how your information is being used
- you can ask to see the personal information we hold about you
- you can correct your personal information if it's not accurate or complete
- you can ask us to delete personal information where there's no reason for us to keep using it
- you can limit the way that we use your information
- you can change your mind and tell us you're not happy for us to continue using your information
- you can ask us to send you your personal information, 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 your involvement. You can ask someone to review the decision or if you want to know how the decision has been made
- you can say no to your personal information being used for direct marketing

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

### **Living in a VIVID Home**

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

- Information provided at the application stage
- 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 information that you provide us with
- Information around service adjustments related to health conditions
- any health issues, vulnerabilities and disabilities
- details of any criminal records or anti-social behaviour incidents

- we may take photographs or film events that we host which you'll be invited to, but we'll tell you about this
- Next of kin, emergency contact details and permission to discuss details
- Immigration status to ensure that you have the Right to Rent in the UK
- Ethnicity, nationality, gender, religion, language, marital status

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

- make sure that the information we have for you is 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
- Ensure you receive your full entitlement after the rent review annually by either confirming charges through the DWP or your Local authority.
- provide repairs and maintenance services in line with our landlord health and safety responsibilities
- Understand your housing requirements to ensure we build more homes that you can afford to buy or rent
- collect photos, videos, news stories and case studies which allow us to promote our work
- ask you for feedback and carry out surveys to improve our services - this can be by email, phone, text and/or face to face
- protect our employees and contractors by placing a 'flag' over your tenancy if we consider you to be a risk to employees – we'll let you know about this, where appropriate.
- record sale details within VIVID and CORE (COntinuous REcording of Social Housing lettings and sales) for government research and statistical purposes
- know who is living in our homes so that we can take action to deliver fair and equitable outcomes in line with consumer regulations

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

- external agencies who manage utilities in your home
- the relevant local authorities to support their services to you
- external companies who carry out surveys for us, in the interest of our customers. Most used are Rant & Rave and TLF Research. You can opt out of these surveys any time via your online account or by letting us know.
- contractors who carry out repairs and services on our behalf, they may also share your information with contractors they use
- tenancy support services
- CORE (COntinuous REcording of Social Housing lettings and sales); we'll record information about you and your purchase within the CORE system. You'll receive more information in CORE's privacy notice
- The Civil courts should there be a breach of your tenancy, you would be notified of this breach via a notice before receiving any court paperwork.

- The Department for Work and Pensions to confirm or query any Housing costs entitlement through Universal Credit
- professional advisors e.g. lawyers or insurers
- our regulators
- our IT systems suppliers, for legitimate business use, to keep our systems safe to protect information
- we may also share your details with other relevant agencies and services, where appropriate
- external mailing providers who send you correspondence on our behalf
- we may share your details with the police and other agencies if we believe that a crime is taking place or to detect or prevent crime

### **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
- details of any criminal records
- 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 or vulnerability needs
- information on your savings
- Immigration status, where necessary

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

- check if you're eligible 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 information 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, affordability and credit worthiness for a mortgage. This is so we can 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 fulfil the requirements to purchase a property
- determine the progress and timeframes for the sale of any existing property you own
- tailor our services to meet your needs

**Sometimes we'll need to share your information. 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
- third party estate agencies - to market and sell our properties. These agencies won't share your information with other companies and will only use your information to assist you when buying a home from us
- external messaging providers to send bulk correspondence on our behalf
- our panel mortgage advisors and your mortgage advisor/provider - to determine your eligibility and affordability for 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 information 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 help process your mortgage
- surveyors instructed by your mortgage lender - to value the property you're buying
- we may share your information with the police and other agencies if we believe that a crime is taking place or to detect or prevent crime
- Help to Buy Agent is now closed, but for historic and existing applicants and buyers we'll have information about you and your purchase from your Help to Buy application
- Other agencies to help identify and share support needs

**Purchasing a newbuild home or becoming a shared owner**

We collect and process your data so that we can:

- Market and sell newbuild and resales 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 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.

If you provide us with the personal details of someone else, please make sure they’re accurate, and that you have their permission.

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 3rd party agencies who assist us to market & sell VIVID newbuild and resales 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 you can opt out or change your preferences anytime by contacting us at [sales@vividhomes.co.uk](mailto:sales@vividhomes.co.uk)
- External messaging providers to send bulk correspondence on our behalf

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.
- The seller of a resale property - We will share your contact details with the seller of a resale property to enable them to arrange a viewing directly with you.

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.
- Resale sellers solicitor - for updates and to assist your sale progressing, if you're purchasing a resale property
- Mortgage advisor/lender - for updates and to assist your mortgage progressing.
- Surveyors instructed by your mortgage lender- to value the property you are purchasing.

- 3rd Party 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 3rd 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 is now closed, for historic and existing applicants and buyers we'll have information about you and your purchase from your Help to Buy application
- 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.

## **Working and volunteering 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, passport, and other documents to prove your eligibility to work in the UK.
- 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, emergency contact details 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, gender 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 on any 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
- information about your use of our company vehicles, including driver behaviour and efficiency, location, date and time, 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
- Your location when lone working via lone working devices.

### **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 any medical and occupational health professionals we engage with
- our benefit and training providers
- your trade unions and other employees
- other professionals we may engage with e.g. to advise us generally and/or in relation to any grievance, performance matter for example
- 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 advisors e.g. lawyers or insurers
- benefit providers
- occupational health
- pension providers
- potential purchasers of some or all our business or on restructuring
- our regulators
- banks
- the Disclosure and Barring Service (DBS)
- our IT systems suppliers, for legitimate business use, to keep our systems safe to protect information
- external mailing providers to send you correspondence on our behalf

- we may share your details with the police if we believe that a crime is taking place
- we may share your details if we believe you're at risk due to a mental health emergency.

Sometimes we'll need to share some personal information with internal teams.

Usually, information will be anonymised, but this may not always be possible. Whoever we send the information to is bound by confidentiality obligations.

### **Video conferencing and videos**

We may record some of our video conferences to improve our services, for translation purposes or to promote messages to our employees 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.

### **Artificial intelligence (AI) privacy statement**

At VIVID, we care about keeping your information safe while using the benefits of artificial intelligence (AI) to help us. As a social housing provider, we're committed to transparency and fairness when handling data. Here's the approach we're taking with AI.

Data Security and Privacy:

- We make sure your personal information is safe. Our AI systems follow strong rules to protect it.
- We collect only necessary data for AI-driven services, ensuring compliance with relevant data protection laws.
- We're not changing the way we hold your information, so your data is still stored securely. We regularly review and update our security measures.

Fairness:

- Our AI is made to be fair. We check it often to fix any mistakes that may happen, and you'll have an option to report something that's not quite right.
- We provide a fair service to all tenants, regardless of background or demographics.

Transparency and Accountability:

- We believe in being open and honest. If AI makes decisions that affect you, we'll explain why.
- If you have concerns about AI-driven processes, we encourage you to reach out to us. We're committed to fixing problems that come up as quickly as possible.

Understanding AI:

- Before using artificial intelligence systems, if it affects you, we'll make sure you understand how it impacts your housing experience.
- We'll clearly explain the purpose and effects of using AI.



- Using AI will help us to provide a more efficient service.

Continuous Improvement:

- We regularly check our AI to look for ways we can enhance privacy, accuracy, and efficiency.
- Your feedback helps us to improve. You can contact us anytime with suggestions.

AI helps us to improve our services, but it doesn't replace our dedicated teams. You have the right to human intervention so can always talk to a real person. We remain committed to providing a compassionate, personal support service to all our tenants.

If you have any questions or concerns, please get in touch us using any of the methods on our contact us page.

### **Chatbot**

Our chatbot is an automated tool designed to provide answers and direct you to relevant information. It can be accessed by clicking the purple 'Let's Chat' button located at the bottom right-hand side of our website.

During working hours, if the chatbot can't resolve your query, it will connect you to a live advisor for further assistance. Outside of these hours, it will collect your details and ensure a representative contacts you later. We assure you that any information you provide will be managed in accordance with our retention schedule.

Please be aware that all chatbot conversations are transcribed and may not be captured correctly. These transcripts are associated with your account if you are logged in.

### **Call recordings**

Only telephone interactions with our Customer Experience team are recorded and retained for 90 days. These recordings serve multiple purposes, including internal training, complaint resolution, and potential use as evidence in legal proceedings.

These recordings are transcribed and the transcripts are kept for the period of the tenancy plus 6 years. Transcripts are automated so the accuracy of these transcriptions may vary. If you are logged in during the call, these transcripts will be associated with your account.

### **CCTV**

Some of our locations and offices have CCTV and you may be recorded when you visit them. Signs are in use to tell you that CCTV is being used. We use CCTV to provide security and protect our employees and visitors.

CCTV is only viewed by employees 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.

## **Security of your information**

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

We have comprehensive policies and procedures around information security and data protection which helps reduce the risk of anyone accessing or disclosing your information unlawfully.

Our employees are required to complete mandatory data protection training annually and additional training is provided where appropriate.

When working with 3rd parties we ensure we have appropriate agreements in place to protect your information. We'll only share information that is absolutely necessary for the purpose intended. And we don't sell on your personal information.

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

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, your personal details can be updated using your online account.

We'll keep your information for as long as it's relevant to the purposes set out above and in line with our retention schedule. We may 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'll take steps to keep the information safe while we hold it and when we don't need it anymore, we'll destroy it safely.

## **Using our online services**

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

- the date and time you used our services
- the pages you visited on our website and how long you visited them for
- the internet browser and devices you're using
- your country, city and language
- the website address from which you accessed our website
- information collected from online contact forms, surveys and polls about the website
- if you're a new or returning visitor

We'll only collect this information if you've provided your consent and agreed to the necessary cookies on entering our website.

### **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

You can opt out of this by changing your cookie preferences.

### **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).

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

We process all data in line 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 information which overrides those legitimate interests)
- **Public interest** - we process the information to carry out a task of public interest
- **Consent** - you have given us clear consent to process your personal information for a specific purpose
- **Vital Interest** - the processing is necessary to protect someone's life

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

If you have any concerns or wish to express any of the your rights, please tell us and we'll respond as soon as we can. You can contact our Data Protection Officer, Lucy Scott using the contact methods found [here](#).

The Information Commissioner's Office (ICO) provides lots of advice on your rights and protecting your information which you can find at <https://ico.org.uk> or by calling 0303 123 1113. You also have the right to raise any concerns with them.