



Path (Plymouth Access to Housing) Ltd is committed to protecting the personal information we collect about you and will obtain, use and disclose this information only in accordance with legislation. For the purposes of the Data Protection Act 1998, Path (Plymouth Access to Housing Ltd) is a Data Controller. This means that we collect personal data and decide how and why it is used and 'processed'. We will only use it for the purposes listed below and for things that we have told you about in advance.

This privacy notice explains what happens to the information we collect for the purposes of housing management.

The Data Protection Act 1998 and other laws apply to our use of anyone's personal information and everyone has rights regarding how their personal information is handled.

1. We have published this privacy notice to tell you:
2. What information we collect about you
3. What we use your personal information for
4. Who (if anyone) we pass it on to and how they use it
5. How you can access the information we hold about you.

## **Information we may collect and hold from you**

We may collect the following personal information about you:

### **When you first make an application for housing information and advice, deposit guarantees and housing:**

- Your name and contact details for use across the organisation and by our partners
- Detailed personal information such as name, photo identification, age, sex, date of birth, ethnicity, income, National Insurance number, private expenditure data, employment status, contact details (telephone numbers and email addresses), gender, gender identity, relationship status, any disabilities, religion, sexuality, nationality, caring responsibilities, access to financial services such as banks and credit unions, bank details, benefits, council tax, affordability information, eligibility for UK residency, details of those who you want us to communicate with on your behalf, how you prefer us to contact you, whether you have any literacy problems, your ability to speak English and language preferences, requirements for different communication formats, your preferences for getting involved and the service areas that are of most interest to you
- Your particular needs or preferences so that we can understand them better
- Medical information so that we can prioritise and assess a housing application

## **Additional information required to manage your tenancy and housing needs:**

- Your support needs so we know how we can support and assist you before and during your tenancy
- Details relating to the repair and maintenance of your home
- Information that you provide to your relevant housing or maintenance
- Information about allegations of anti-social behaviour
- Voice and image recordings for safety, crime prevention and quality management

## **Job application and employment**

If you send us information in connection with a job application, we may keep it for up to 3 months in case we decide to contact you at a later date.

If we employ you, we collect information about you and your work from time to time throughout the period of your employment. This information will be used only for purposes directly relevant to your employment. After your employment has ended, we will keep your file for six years before destroying or deleting it.

## **To provide security:**

- We may operate a CCTV system, which collects images and is used in accordance with CCTV policies and procedures
- We may collect information about individuals where they pose a substantial threat to our staff, clients or contractors

## **To improve customer service delivery, you can give us:**

- Details of your friends, relatives or neighbours who you trust to contact us on your behalf
- With your consent, your name, photo, video or story could be used for brochures, advertising or press releases
- Details about our services or the service provided by other organisations

## **When you ask for additional services:**

- If you ask us for support requirements we will hold detailed information about your needs and if applicable your family's needs
- We will hold records of payments for the services provided to you
- If you contact us about money problems we will hold detailed information about your income and financial situation
- we will ask about your employment and learning history
- We may hold information about your history, for example, regarding credit status or offences, if we need it to look after our staff, business or anyone else.

## **When we process information about you on behalf of another organisation you receive services from:**

- We will receive the information we need to provide a service to you
- We may get the information, or related information, from you or our partner organisations, our staff or benevolent funds
- We may also record factual information whenever you contact us or use our services, so we have a record of what happened

## **What we use your personal information for**

### **For providing our housing services to you:**

- Keeping in touch and understanding your needs
- Telling you about changes to Path
- Meeting your housing management needs and requirements
- Managing payments from you, to you and for accounting purposes including debt collection
- Providing additional services at your request, including support, temporary accommodation and deposit guarantees
- Tackling anti-social behaviour
- Path colleague and customer security and health and safety
- Quality management
- Meeting our legal obligations including the requirements of our funders
- To resolve complaints and queries
- To participate in initiatives to assist in the prevention of homelessness, financial and social exclusion.
- To ensure no group is disadvantaged

## **Who else we may pass your information to**

There may be times when we disclose your details to others, as follows below. Where required, we will ensure that we have appropriate information sharing protocols in place.

- Our staff who provide services to you
- Another person acting on your behalf, where you have given permission for them to act
- Local authorities, other housing and support organisations and statutory agencies
- Partner organisations
- Our insurers, in case of public liability claims
- External assistance where you have agreed to the referral, for example, to a benevolent fund
- Utility companies

In some cases we may have a duty to disclose your information by law to:

- Our partner organisations whose purposes are compatible with ours
- Landlords and other housing associations
- Local authorities, regulators and government departments
- Police, fire services or health authorities, or medical staff

- Others who may need information from us for their own purposes, for example detecting and preventing crime, prosecuting offenders and for the prevention and detection of fraud.

We do not give anyone access to your information in return for payment for their marketing or commercial purposes.

We will not share your personal information with anyone who claims to represent you unless we are satisfied that you have appointed them or they act in some recognised official capacity.

## **Use of information we collect through automated systems when you visit our website**

### **Cookies**

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit any website. They allow information gathered on one web page to be stored until it is needed for use on another, allowing a website to provide you with a personalised experience and the website owner with statistics about how you use the website so that it can be improved.

Some cookies may last for a defined period of time, such as one day or until you close your browser. Others last indefinitely.

Your web browser should allow you to delete any you choose. It also should allow you to prevent or limit their use.

We use cookies in the following ways:

- to track how you use our website
- to record any emails asking for advice and support

### **Personal identifiers from your browsing activity**

Requests by your web browser to our servers for web pages and other content on our website are recorded.

We record information such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution.

We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.

If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to our website.

## **Data may be processed outside the European Union**

Our website is hosted in America.

Accordingly data obtained within the UK or any other country could be processed outside the European Union.

For example, some of the software our website uses may have been developed in the United States of America or in Australia.

We use the following safeguards with respect to data transferred outside the European Union:

- the processor is within the same corporate group as our business or organisation and abides by the same binding corporate rules regarding data processing.
- the data protection clauses in our contracts with data processors include transfer clauses written by or approved by a supervisory authority in the European Union we comply with a code of conduct approved by a supervisory authority in the European Union
- we are certified under an approved certification mechanism as provided for in the GDPR
- both our organisation and the processor are public authorities between whom there is either a legally binding agreement or administrative arrangements approved by a supervisory authority in the European Union relating to protection of your information

## **Encryption of data sent between us**

We use Secure Sockets Layer (SSL) certificates to verify our identity to your browser and to encrypt any data you give us.

Whenever information is transferred between us, you can check that it is done so using SSL by looking for a closed padlock symbol or other trust mark in your browser's URL bar or toolbar.

## **Access to your own information**

1. At any time you may review or update personally identifiable information that we hold about you, by signing in to your account on our website.
2. To obtain a copy of any information that is not provided on our website you may send us a request at [info@pathdevon.org](mailto:info@pathdevon.org)
3. After receiving the request, we will tell you when we expect to provide you with the information, and whether we require any fee for providing it to you.

## **Verification of your information**

When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

## **Complaining**

When we receive a complaint, we record all the information you have given to us.

We use that information to resolve your complaint.

If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is.

We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

1. If you are not happy with our privacy policy or if have any complaint then you should tell us by email. Our address is [info@pathdevon.org](mailto:info@pathdevon.org).
2. You can find further information about our complaint handling procedure at [http://www.pathdevon.org/uploads/6/4/8/8/64882403/complaints\\_procedure\\_summary.pdf](http://www.pathdevon.org/uploads/6/4/8/8/64882403/complaints_procedure_summary.pdf)
3. If a dispute is not settled then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.

If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office. This can be done at <https://ico.org.uk/concerns/>

## **Retention period for personal data**

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

1. to provide you with the services you have requested;
2. to comply with other law, including for the period demanded by our tax authorities;
3. to support a claim or defence in court.

## **Compliance with the law**

Our privacy policy has been compiled so as to comply with the law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your jurisdiction, we should like to hear from you.

However, ultimately it is your choice as to whether you wish to use our website.

## **Review of this privacy policy**

We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records.

If you have any question regarding our privacy policy, please contact us.

## **Accessing and removing the information we have about you**

You have a legal right to request information that we hold about you and we have a duty to respond within a reasonable period of having obtained the data (within one month). You can ask any of our staff, email us at [info@pathdevon.org](mailto:info@pathdevon.org) or write to:

PATH (Plymouth Access to Housing) Ltd  
The Harwell Centre  
28-42 Harwell Court  
Plymouth  
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