

PRIVACY POLICY

18 February 2019

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Date effective from:	18/02/2019
Policy approved by:	Samantha Donigan
Review Date:	18/02/2022

EIA Required?	<input type="checkbox"/>
EIA Completed?	<input type="checkbox"/>
Revision number:	1
Lead officer:	Assurance Team

1 INTRODUCTION

- 1.1 Stockport Homes is committed to ensuring that it complies with Data Protection legislation when processing personal data within the course of its business. As part of this, we are required to inform people about how we collect, use, share and store personal information. This privacy notice provides information about how we ensure we process such information in a lawful, fair and transparent manner.

2 STRATEGIC LINKS

- 2.1 This policy will detail how the organisation will comply with the following:
- General Data Protection Regulation (GDPR) 2018
 - Data Protection Act (DPA) 2018
- 2.2 The policy is closely linked to the Groups internal policies and procedures:
- Information Governance Policy 2018
 - Data Subject Rights Policy 2019

3 WHO WE ARE

- 3.1 Stockport Homes is an Arms Length Management Organisation (ALMO) with over 30,000 customers. It manages and develops housing on behalf of Stockport Council, owns a range of properties as a result of its in-house property development and acquisition activity and manages properties on behalf of other landlords.
- 3.2 Our role includes delivering a range of services to help manage and improve neighbourhoods, support vulnerable people and assist the Council to discharge its legal obligations to those who need housing.
- 3.3 We hold personal information about our customers to allow us to provide a range of services to them. We hold personal information about employees to enable us to meet contractual requirements and be a great place to work.
- 3.4 Our head office is based at Cornerstone, 2 Edward Street, Stockport, SK1 3NQ.
- 3.5 Stockport Homes operates in a Group Structure. Stockport Homes Limited is registered as a Data Controller with the Information Commissioner's Office (ICO) [registration number Z9540790]. Our subsidiary, Three Sixty (SHG) Limited, is also registered with the ICO [ZA277767].
- 3.6 The Data Protection Officer (DPO) for Stockport Homes Group is the Assurance Manager.

4 HOW WE COLLECT PERSONAL DATA

4.1 We use information about our customers to plan and undertake the delivery of services. We use your data in line with the principles set out in the General Data Protection Regulation (GDPR).

4.2 Some examples of how we use your data are provided below; please note this is not an exhaustive list:

- To manage your tenancy
- To manage your property
- To provide additional support/assistance to you
- To ensure that we meet your specific needs
- To ensure that we meet other legal obligations (for example in relation to health and safety)
- To monitor performance and undertake service planning / development
- To participate in data matching exercises (for example to identify tenancy fraud and collect former tenant arrears)
- To compile and analyse statistics (for example customer profiling)
- Where otherwise permitted under data protection legislation.

4.3 With your permission, we may use your photographs in our publications (for example in our customer newsletter or annual report) or electronically (for example on our website or Facebook page).

5 HOW WE PROTECT PERSONAL DATA

5.1 Data security is very important to us. We will ensure that:

- Your data is kept safe and secure at all times
- Handle your information responsibly and respect your confidentiality
- Only collect and process data where it is necessary for us to do so
- Securely delete / destroy data when it is no longer required
- Be open with you about how we use your data and who we may share it with respect to your privacy rights

5.2 Training is delivered to staff with access to customers' personal information. This training is delivered and facilitated by The Assurance Manager and The Assurance Team.

6 HOW WE SHARE PERSONAL DATA

6.1 There may be occasions where we share your data. This may happen when:

- A third party provides a service on our behalf (for example grounds maintenance or repair works)

- Where there is a legal requirement to do so (for example to prevent and detect crime, in line with the data protection exemptions provided by regulations)
 - Where we are working in partnership with another organisation (for example a support agency or the Council).
- 6.2 In some instances data may be transferred outside of the European Union. In all cases, we will take adequate steps to ensure the security and protection of your personal information.
- 6.3 As part of the Rental Exchange project, we will share your tenancy information with Experian, including your rent history. This is to enable tenants that pay their rent to build up a good credit score. For more information please see [The Rental Exchange page](#).
- 6.3.1 This is an example of processing wholly or partly by automated means which means you have specific rights. Please see the right to object (8.2.7) and rights related to automated decision making (8.2.8).
- 6.4 Stockport Homes protects its staff from violence, threatening behaviour and verbal abuse. Our staff can now use devices to monitor and record incidents where they feel their personal safety is at risk. Audio recordings obtained through these devices may be used to take sanctions against offenders and may be used in criminal and civil proceedings.
- 6.5 We may share basic customer data with utility providers where we have a legitimate interest. In such cases, the personal data provided will be limited to name, date of birth and tenancy start date.
- 6.6 As part of homelessness research being carried out by the Ministry of Housing, Communities and Local Government (MHCLG), the personal data of people who have asked us for help with homelessness will be collected and shared (more information is available [here](#)).
- 6.7 Stockport Homes operates CCTV systems in various residential areas which record images for the purposes of public safety. Images may be shared with other agencies for these and related purposes or as required by law. These agencies may include those that work in partnership with Stockport Homes such as Stockport Council, the Police, Anti-Social Behaviour Teams and other Registered Social Landlord (RSLs).
- 6.7.1 Please note that CCTV footage captured on Stockport Homes' cameras is deleted after 23 days.

7 DATA SUBJECT RIGHTS

- 7.1 Under the GDPR, you have rights relating to how we process your personal data. You can exercise your rights by emailing assurance@stockporthomes.org or writing to us at our Head Office address (above).
- 7.2 These rights include:

7.2.1 Right to be informed

- You have the right to ask us to explain why your information is collected, how it is used, how long it will be stored for, and who it is shared with.

7.2.2 Right to access

- You have a right to access your personal data, this is called a Subject Access Request (SAR).
- If you would like to submit request please visit the [SAR page on the website](#). Alternatively, you may complete and return our Subject Access Request Form which is available on request. You may also submit your request verbally or in writing.
- There may be some occasions when we are unable to provide you with some information for example, if it was provided in confidence or if it relates to a criminal proceeding. For more information, please refer to our [Information Governance Policy](#) or review information provided on www.ico.org.uk

7.2.3 Right to rectification

- We work to ensure that all personal data held about you is accurate and correct. However, there may be times when the information we hold is no longer accurate. If this is the case, please contact us and we will update it for you.

7.2.4 Right to erasure

- In some circumstances, you have the right to request the deletion of your personal data. This is not a guaranteed right as we may have a legitimate reason to keep the information. For example, an existing customer could not be forgotten as there is a distinct legal basis for Stockport Homes to be processing that data (the information is necessary for the performance of a contract). We would not be able to provide services to customers without using the personal data.
- Where information is needed to fulfil statutory obligations, personal information shall be retained for those purposes, and so this right may not be applicable in those situations.

7.2.5 Right to restriction

- Where information cannot be erased you have the right to restrict the processing of your personal data. This limits how we use your personal information.
- Where processing is based on your consent, you have the right to withdraw that consent. This can be actioned by you at any time.

7.2.6 Right to data portability

- In certain circumstances you have the right to have your personal data transferred from one organisation, to another. This right only applies to information you have provided to us and it does not apply to paper records.

7.2.7 Right to object

- You have the right to object to the processing of your personal data. Should you object to any processing please contact us with

the details of your objection and we will take your concerns into account. This does not necessarily mean your data will be erased, instead we may restrict the processing.

- You have the right to object to direct marketing communications. This can be actioned at any time and we will update our records accordingly.
- You also have the right to object to any processing conducted wholly or partly by automated means. If you object to the decision you can request it be reviewed manually by a member of the organisation.

7.2.8 Rights related to automated decision making and profiling

- You have the right to not be subject to a decision that is made solely by automated means, including profiling, so long as the decision produces a legal effect.
- Should you wish to object/not be subject to any automated decision please let us know any we will update our records.

7.2.9 Right to lodge a complaint

- If you are unhappy with the service received you may make complaint. More information on our complaints process is available [here](#).
- You also have the right to lodge a complaint with the supervisory authority, The Information Commissioners Office (ICO). To make a complaint, visit <https://ico.org.uk/make-a-complaint/>

7.3 For more information regarding your individual rights please see our Data Subject Rights Policy.

8 COOKIES

8.1 Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.allaboutcookies.org

8.2 You can set your browser to not accept cookies and the above website tells you how you can remove cookies from your internet browser. However, in some cases, some of the website features may not function as a result.

8.3 Stockport Homes' website uses cookies to remember user preferences, identify unique visitors and to store data. Much of the data is lost once the internet browser is closed whereas others are kept for longer. We do not store personally identifiable information in cookies we create, but we do use encrypted information gathered from you to help improve your experience of our website(s). Please note that cookies cannot harm your computer.

8.4 Please note, our website contains links which take you to other, external websites, such as to partners that deliver services with us, or to an external

recruitment website. Where you utilise a link within our website, please ensure you familiarise yourself with the Cookies Notice on the website you arrive at, as that processing is not covered by this notice.

- 8.5 Further information on our use of cookies is supplied in Section 13.

9 OTHER WEBSITES

- 9.1 Our website contains links to other websites. This privacy notice will not apply to those external websites and you should familiarise yourself with the other organisation's privacy notice in the first instance.

10 CHANGES TO THE PRIVACY POLICY / NOTICE

- 10.1 We will continually review and update this privacy notice to reflect changes in our services and to comply with changes in the law. When such changes occur, we will update this privacy notice and amend the "last updated" date on this page.
- 10.2 If there are substantial changes to this statement or in how Stockport Homes use your personal information, we will advertise the updated notice on the front page of our website, advertise the changes in our head office and include an article in our customer newsletter.
- 10.3 We encourage you to periodically review the contents of this privacy notice.

11 FURTHER INFORMATION

- 11.1 For further information about Data Protection, please visit the Information Governance page or for more general information, please visit the Information Commissioner's Office website (external website).
- 11.2 Alternatively, you can contact the Assurance Manager by writing to the head office address (provided above), by emailing assurance@stockporthomes.org or by calling 0161 474 2139.

12 OWNERSHIP, MONITORING, AND REVIEW

- 12.1 This policy will be reviewed every year to ensure that it remains fit for purpose. However, it will be updated more frequently should new guidance / legislation be published.

13 ANNEX ONE: COOKIES

Cookie	Where used	Expiry	Further information
LOGIN_USERNAME_COOKIE, SSRV_AUTHENTICATION, SSRV_IDLE_SESSION	MyOnline	When session ends	Enables the user to remain logged in to the self-service product.
CFID	Website	2 hours	
CFTOKEN	Website	2 hours	Maintains authentication state when a user logs in.
JSESSIONID	Website	When session ends	
VOPECRA	Website	Never	Remembers when a user has elected to accept cookies.
_utma	Website	2 years	These cookies are used to collect information about how visitors use our websites. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.
_utmb	Website	30 minutes	
_utmc	Website	When session ends	
_utmz	Website	6 months	
googstransSession	Website	When session ends	
_ga	Website	2 years	Used to distinguish users.
_gid	Website	1 day	Used to distinguish users.
ASP.NET_SessionId	Website	When session ends	General purpose platform session cookie, used to maintain an anonymised user session by the server.
XSRF-TOKEN, XSRF-V, __RequestVerificationToken	Website	When session ends	This is an anti-forgery token used to prevent CSRF attacks.
__atuvc	Website	1 year	These cookies are associated with the AddThis social sharing widget. It stores an updated page share count.
__atuvS	Website	30 minutes	
onboarding	Website	1 month	Used to store the user's accessibility/on-boarding preferences