

PRIVACY NOTICE (CITIZEN NEW HOMES LTD CUSTOMERS)

Here at Citizen New Homes Limited (Signature), we take your privacy seriously. We are a Controller of personal data for the purpose of the Data Protection Act 2018. Below, we detail what information we collect, why we collect it, who we share it with and how we safeguard it. We will use your personal information to administer your purchase and to provide appropriate support and advice, and place you in contact with organisations of your choice, that will offer support that you control, however, we will share it with appropriate third parties where there is a legal justification. The Purposes for which we collect your personal data include the following:

- Regulatory purposes
- Management of homes
- Advice on outright purchase and shared ownership
- Collection of rents, other sums and receipt of benefits
- Money/debt advice and employment
- Maintenance and repair of homes
- Legal Proceedings
- Health & Safety requirements for tenants and staff
- Prevention and reduction of crime including fraud
- Equal Opportunities monitoring
- Marketing, research, monitoring and survey

For some information, we do not need to seek your consent to hold or process it as it is part of our performance of a contract. We obtain your personal identifiable information in order to conduct our normal business operations, as a private limited company, whose nature of business is the construction of domestic buildings.

We wish to provide you with updates about events, services and other information that we believe are helpful to you in relation to the services that we provide. We may communicate such information to you by post, telephone or email (unless you have registered with the appropriate Preference Service or have indicated to us that you do not require certain forms of communication). In the event that we perform monitoring, research and survey services we may use an external service company to contact you on our behalf. In such circumstances we ensure that legal obligations of confidentiality and information security are placed upon our service providers. If at any time you wish that your information is not used for direct marketing please contact our Customer Service Centre, operated by Citizen Housing Group Ltd on our behalf on 0300 790 6555.

Signature will never sell your information to third parties. For the purpose of this privacy notice we are the “controller” of your personal data as we determine the purposes and content of this information and the methods of processing.

What information we collect, why we collect it, the legal basis for doing so, and how long for:			
What	Why	Basis	Retention
Contact information <ul style="list-style-type: none"> Name Previous address IP (Internal Protocol) address Telephone numbers Email address 	This data is used to set up and maintain your account with us. With your knowledge and where appropriate this information is shared with building developers, financial bodies and advisors for mortgage purposes.	B	Life of property
Special category data <ul style="list-style-type: none"> Nationality Physical and mental health wellbeing 	Health and safety purposes & for analysis, as required by our regulator. With your knowledge and where appropriate this information is shared with building developers, financial bodies and advisors for mortgage purposes.	A	Life of property
<ul style="list-style-type: none"> Financial information including employment history and employment status Identification including photographic proof of identity Bank account details for payment 	To assure ourselves you can financially afford the property, and are not living outside of your means. With your knowledge and where appropriate this information is shared with building developers, financial bodies and advisors for mortgage purposes.	B	Until legal completion on your property
<ul style="list-style-type: none"> Details of any support needs you have Details of those people providing additional support Disability information 	As required by our regulator and to provide information on extra services we provide. With your knowledge and where appropriate this information may be shared with building developers, to support your needs.	B	For a period of six years and the current financial year from date of payment
<ul style="list-style-type: none"> Authority to Act or Power of attorney 	We use this information to ensure we deal with the most appropriate person dealing with your affairs	B	Life of property

<ul style="list-style-type: none"> • Audio and visual images of you, such as photographs, films and audio recordings 	We use this to publicise the work we do.	A	We may retain this permanently
<ul style="list-style-type: none"> • Call Line Identification 	Your number is displayed on our telephones unless suppressed by yourself on your device. Our Customer Service Centre operated by Citizen Housing Group Ltd on our behalf hold a log of the phone number, date, time, duration of call and recording of conversation.	F	1 month from date of telephone call
<ul style="list-style-type: none"> • Marketing, survey, monitoring and research 	Activities associated with improving service delivery and the customer experience	F	Life of property

Types of Legal Basis

A – Consent	B – Contract	C – Legal obligation	D – Vital interests	E – Public task	F – Legitimate interest
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If your application for a property purchase is unsuccessful and you decide to no longer proceed with Signature, or decide not to pursue a property purchase with us, your personal data will be retained for a period of 2 years, after which we will securely delete your personal data from our records.

Where someone sharing a home with you is over 14 years of age, and where you provide next of kin information we require you to inform them that we hold their information. We have a contractual requirement to collect and process this information, as part of the provision of service to you.

Who do we **share** your data **with**?

Some data, such as your name, address, move-in date will be shared with local authorities. We also share information relating to the protection of vital interests such as safeguarding, domestic violence, criminal activity & emergency services. Mortgage Market Limited manage a Rate reducer scheme via a financial advisor who Citizen already have a sharing agreement with (Metro Finance). Citizen send Mortgage Market Limited a legal completion statement showing the transaction which includes the customer's name and address details. Your personal data may also be disclosed where necessary with building developers with the legal justification of the performance of a contract.

How we **keep** your data **safe**?

The organisation takes the security of your data seriously. The organisation has internal controls in place to safeguard that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties. Where the organisation engages contracted third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

How we **obtain** and use your data

We obtain personal identifiable information by various means, this can be face to face, by email, by telephone, correspondence or by receiving information from others, for example local elected members who are representing you, police, health or social care agencies and benefit agencies.

Signature may also collect your information through online platforms (such as our website via our enquiry forms and any requests for callbacks or bookings through Citizen Housing Group Customer Service Centre), events, telephone conversations, interactions with our sales agents and any partnerships that allow us to deal with your enquiry.

If a scheme is managed by an estate agent who works in partnership with us, we may pass your information to them to allow them to be able to respond to your enquiry and discuss any additional requirements you may have an interest in.

Collecting your data also allows us to keep you updated about those properties we understand meet the criteria specified by you in potentially buying through Signature. If you choose to purchase your home through Signature we may contact you for additional information for market research and case studies as part of our legitimate interests of promoting the benefits of home ownership to like-minded individuals.

The personal data we collect such as your name, address, contact details, income and savings, previous household occupancy type, number of occupants in your current household and requirements for your next home such as number of bedrooms and accessibility needs is important. It then allows us to provide you with a focused service that meets your specific needs. We also strive to keep your personal data accurate and current.

Signature process your personal data on the basis of legitimate interest for:

Communications

Changes

Seeking your views

We may also from time to time record our phonecalls for training and monitoring purposes. This is with the objective of helping us to improve our services.

Where we share information with third parties, we do so safely.

Your rights

Under the General Data Protection Regulations (GDPR), you have the right to be informed about how we use any data you provide: what data we collect, why, who has access to it, how long it's kept, and the legal basis we have for doing so. In certain circumstances we may need to request your consent to collect and use your data, but in those cases, you have the right to object and withdraw that consent just as easily as it is given. Should you not wish to provide your consent, any services directly related to this data cannot be provided.

You have the right to have your personal data removed where there is no legal basis for us to hold it, as well as the right to request your data is transferred to a third-party (data portability). Any automated decision making, based on your data, can be challenged and a human decision made. Additionally, you have a right of access and can request a copy of any personal data provided, and subsequently the right of rectification of any incorrect data identified. Visit the data protection page on our website to see more information about your rights. To exercise any of the above rights please contact our appointed representatives Citizen Housing Group's Data Protection Officer (Mr Shane Murphy) on the address below. Overall responsibility for management of your personal data resides with Citizens senior information risk owner (Mr Ian Tinsley) at Citizen Housing Group Ltd, 4040, Solihull Parkway, Birmingham Business Park, Birmingham, B37 7YN or dataprotection@citizenhousing.org.uk

Complaints can be lodged with the supervising authority at The Information Commissioner's Office: <https://ico.org.uk/concerns> or 0303 123 1113.

Updates to this Privacy Notice will appear from time to time on our website. The date of the last update to this Privacy Notice appears in the footer of this document.