



Catalyst Housing Ltd and Aldwyck Housing Group Limited

Privacy Statement for members of the public

1 May 2019

Key points:

- **Why do we use your data?** We typically only use your personal information where you come into contact with us either directly or indirectly.
- **Special categories of data:** Depending on the nature of your interaction with us, we may receive information about your health, racial and ethnic origin or religion.
- **Sharing your data:** We will only share your data with our third-party service providers, subsidiaries and other entities in the group or with other organisations as required by law.
- **Security:** We respect the security of your data and treat it in accordance with the law.
- **International transfer:** We shall not transfer your personal data outside of the European Economic Area.

1 Purpose of our privacy notice

- 1.1 Under data protection legislation, we are required to explain to you why we collect information about you, how we intend to use that information and whether we will share your information with anyone else.
- 1.2 This statement applies to member of the public who come into contact with us in our day to day operations. It does not apply to our residents, commercial contacts or employees.
- 1.3 It is important that you read this statement so that you know how and why we use information about you. It is also important that you inform us of any changes to your personal information so that the information which we hold is accurate and current.

2 Who are we?

2.1 We are:

2.1.1 Catalyst Housing Ltd (**Catalyst**), registered office Ealing Gateway, 26–30 Uxbridge Road, London W5 2AU; and

2.1.2 Aldwyck Housing Group Limited (**Aldwyck**), registered office Ealing Gateway, 26–30 Uxbridge Road, London W5 2AU.

2.2 Any reference to “we”, “our” or “us” in this statement is a reference to both Catalyst and Aldwyck.

2.3 We are "data controllers", meaning that we are responsible for deciding how we hold and use personal information about you.

3 The merging of Catalyst and Aldwyck

3.1 Catalyst and Aldwyck are merging and further information about how this will affect you can be found here: <https://www.chg.org.uk/our-business/catalyst-and-aldwyck/catalyst-and-aldwyck-information-for-customers/>

3.2 In the short term, Catalyst and Aldwyck will remain as two separate entities, with Aldwyck a subsidiary of Catalyst. Eventually, Catalyst and Aldwyck will combine to create a single entity.

3.3 This privacy statement is being provided to you to explain how your personal information will be effected during the merger process (i.e. whilst Catalyst and Aldwyck are two separate entities), which we expect to be finalised by April 2021. Once the merger is complete, we will provide you with an updated privacy statement.

3.4 If you are a **member of the public who has come into contact with Aldwyck in its day to day operations**, your personal information will be gradually migrated to Catalyst during the merger process, and that information may be processed by Catalyst where this is necessary for any of the reasons set out below at paragraph 8. As this progresses, we will be providing you with regular updates.

3.5 If you are a **member of the public who has come into contact with Catalyst in its day to day operations**, your personal information will remain on Catalyst’s systems and will not be transferred to Aldwyck. During the merger process, as Catalyst and Aldwyck will be gradually sharing information systems, your information may be accessed by Aldwyck (as a

Catalyst subsidiary) where this is necessary for any of the reasons set out below at paragraph **Error! Reference source not found.**

4 Our Data Protection Officers

- 4.1 Our Data Protection Officers are responsible for overseeing what we do with your information and monitoring our compliance with data protection laws.
- 4.2 If you have any concerns or questions about our use of your personal data you can contact Catalyst's Data Protection Officer by writing to The Data Protection Officer, Catalyst Housing, Ealing Gateway, 26–30 Uxbridge Road, London W5 2AU or by emailing: data.protection@chg.org.uk

5 Why are we collecting your information?

- 5.1 We may collect information about members of the public for a variety of different reasons where they come into contact with us directly or indirectly during our day to day operations. For example, you may be captured on our CCTV footage when visiting one of our premises, you may make a routine enquiry with us, or you may come into contact with us through your relationship with one of our residents or employees.

6 Types of personal information we use

- 6.1 We only collect information about you as a result of your interaction with us and we only collect information about you which is relevant to the nature of that interaction. This may include:
 - 6.1.1 **personal details** (such as your name and gender);
 - 6.1.2 **contact details** (such as your address, personal telephone number and personal email address);
 - 6.1.3 **information about your relationship with one our employees or residents** (such as where you are a dependant, next of kin or emergency contact);
 - 6.1.4 **financial information** such as details of your payment to us for services which we are contracted to perform for you;
 - 6.1.5 **security information** such as CCTV footage; or
 - 6.1.6 **information about a complaint or enquiry** which you may submit to us.

Special categories of personal data

6.2 Some of the information which we collect may be special categories of personal data (also called sensitive personal data). Special categories of personal data require a higher level of protection. The special categories of personal data about you which we may collect use include

6.2.1 your **race or ethnicity** (for example in CCTV footage);

6.2.2 your **religious beliefs** (which could be apparent from CCTV footage);

6.2.3 your **sexual orientation** (for example, where you have a relationship with one of our residents or employees);

6.2.4 information about your **health** (for example, where you require assistance to access one of our properties).

7 Source of your personal information

7.1 The above information which we collect about you will be obtained through a variety of sources which include:

7.1.1 from you directly as part of your interaction with us;

7.1.2 from information provided to us on forms when you sign up to activities at our community centres and events, or hire a room or other facilities with us;

7.1.3 from information provided to us as part of a membership application;

7.1.4 from our residents or employees with whom you may have a relationship.

8 How and why we use your personal data

8.1 We use the types of personal data listed above for a number of purposes, each of which has a "lawful basis". In accordance with the data protection laws, we need a "lawful basis" for collecting and using information about you. There are a variety of different lawful bases for using personal data which are set out in the data protection laws.

8.2 We have set out below the different purposes for which we collect and use your personal data, along with the lawful bases we rely on to do so.

Why we use your information	Our lawful basis for using your information
<p>Security: We routinely use CCTV cameras for purposes of security in order to protect our residents and employees. It is possible that you may be captured on CCTV when visiting our premises.</p>	<p>Legitimate interest: It is necessary for our legitimate interests (where they are not overridden by your rights).</p> <p>Public information: Where the information is public (e.g. where a disability, your race/ethnicity or religious beliefs are clear from your appearance in CCTV footage)*</p>
<p>Handling complaints and enquiries: Where you contact us to submit a complaint or enquiry, we shall use your personal data in order to handle your issue and take any appropriate follow up action.</p>	<p>Consent: We may seek your explicit consent in order to use your personal data for the purpose of taking follow-up action in response to your enquiry or complaint. We shall seek your consent where your complaint or enquiry is of a particularly sensitive nature.*</p> <p>Legitimate interest: For less sensitive complaints and enquiries, we shall rely on the fact that it is necessary for our legitimate interests to use your data (where those interests are not overridden by your rights).</p>
<p>Monitoring and training purposes: We may record telephone calls to our members of staff for training and monitoring purposes</p>	<p>Legitimate interest: It is necessary for our legitimate interests (where they are not overridden by your rights).</p>
<p>Law enforcement and investigations: We may share your personal data with law enforcement agencies where we deem it necessary to do so.</p>	<p>Legal obligation: It is necessary in order for us to comply with legal obligations.</p>
<p>Use of our services: Where you wish to use the services which we provide, we will need to use your personal data as necessary to provide the service to you.</p>	<p>Contract: It is necessary to use your personal data in order to perform our contract with you.</p>

Why we use your information	Our lawful basis for using your information
* This is an additional lawful basis which we need to rely on in order to use special categories of data such as information about your health	

9 What may happen if you do not provide your personal information?

- 9.1 The impact of your refusal to provide certain information to us when requested will depend on the nature of our interaction with you. For example, where you make a complaint or enquiry but refuse to provide us with relevant information about the complaint or enquiry, we may not be able to consider your issue further.
- 9.2 If you have been captured by our CCTV footage and do not provide us with details of when you may have been recorded or provide a description of yourself, we may not be able to identify the footage in which you appear.

10 Complying with data protection law

- 10.1 We will comply with data protection law. At the heart of data protection laws are the "data protection principles" which say that the personal information we hold about you must be:
- 10.1.1 used lawfully, fairly and in a transparent way;
 - 10.1.2 collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
 - 10.1.3 relevant to the purposes we have told you about and limited only to those purposes;
 - 10.1.4 accurate and kept up to date;
 - 10.1.5 kept only as long as necessary for the purposes we have told you about; and
 - 10.1.6 kept securely.

11 Sharing your information

- 11.1 We will share your personal information with third parties where we have a lawful basis for doing so.
- 11.2 The types of organisations with whom we share your personal data are as follows:

- 11.2.1 IT service providers;
- 11.2.2 Security and CCTV service providers;
- 11.2.3 the police and other law enforcement agencies for the purpose of detection and prevention of crime;
- 11.2.4 with organisations with a function of auditing and / or administering public funds for the purpose of detection and prevention of fraud;
- 11.2.5 legal and other professional advisors;
- 11.2.6 courts and other parties in court proceedings;
- 11.2.7 subsidiaries and other entities in our group as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data; and
- 11.2.8 third parties in the context of the possible sale or transfer of services in which you are involved.

12 Transferring your information abroad

- 12.1 We shall not transfer your personal data outside of the European Economic Area.

13 Security of your information

- 13.1 We have put in place measures to protect the security of your information. Details of these measures are available upon request.
- 13.2 Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.
- 13.3 We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

14 Can we use your information for any other purpose?

- 14.1 We typically will only use your personal information for the purposes for which we collect it. In limited circumstances we may use your information for a purpose other than those set out in this policy. If we intend to do so, we will provide you with information relating to that other purpose before using it for the new purpose.
- 14.2 We may use your personal information without your knowledge or consent where such use is required or permitted by law.

15 Storing your information and deleting it

- 15.1 We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal information are available in our retention policy which is available from our Data Protection Officer by writing to The Data Protection Officer, Catalyst Housing, Ealing Gateway, 26–30 Uxbridge Road, London W5 2AU or emailing data.protection@chg.org.uk.
- 15.2 To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
- 15.3 In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.
- 15.4 Once we no longer have a lawful basis for holding your personal data, we will securely destroy your personal information in accordance with our data retention policy.

16 Your rights

- 16.1 Under certain circumstances, by law you have the right to:
- 16.1.1 **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

- 16.1.2 **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
 - 16.1.3 **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
 - 16.1.4 **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
 - 16.1.5 **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
 - 16.1.6 **Request the transfer** of your personal information to another party.
- 16.2 If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact our Data Protection Officer by writing to The Data Protection Officer, Catalyst Housing, Ealing Gateway, 26–30 Uxbridge Road, London W5 2AU or emailing data.protection@chg.org.uk.

17 **Right to withdraw consent**

- 17.1 In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.
- 17.2 Where we are relying on your consent to process your data, to withdraw your consent please contact our Data Protection Officer by writing to The Data Protection Officer, Catalyst Housing, Ealing Gateway, 26–30 Uxbridge Road, London W5 2AU or emailing data.protection@chg.org.uk.

18 **Right to complain to the ICO**

18.1 You also have the right to complain to the Information Commissioner's Office (the "ICO") if you are not satisfied with the way we use your information. You can contact the ICO by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

19 Changes to this privacy statement

19.1 We reserve the right to update this privacy statement at any time, and we will provide you with a new privacy statement when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.