

# Privacy Policy



## **IDENTITY & CONTACT DETAILS OF THE CONTROLLER**

Empowering People Inspiring Communities is committed to protecting and respecting your privacy whilst remaining compliant with The General Data Protection Regulation (EU GDPR) and the Data Protection Act (DPA). This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. For us to drive compliance, we are developing an Information Governance Framework embedded within the organisation, which is compliant with The General Data Protection Regulation.

Empowering People Inspiring Communities, is the Data Controller and has an appointed Data Protection Officer whom can be contacted via email: [DPO@epichousing.co.uk](mailto:DPO@epichousing.co.uk)

You can also contact Empowering People Inspiring Communities, via post at:  
131-141 Ubbertley Road  
Bentilee  
Stoke-on-Trent  
ST2 0EF

## **PURPOSE OF THE PROCESSING AND THE LEGAL BASIS FOR THE PROCESSING**

Empowering People Inspiring Communities, collects and creates personal data for several different purposes:

1. Recruitment and employment;
2. Market analysis;
3. Provision of services to our customers; and
4. Procurement of services

The legal basis for processing personal data for the purpose of recruitment and employment is the pursuit of our legitimate interests of developing our business (recruitment and selection) and subsequently in order to fulfil our legal obligations as an employer and our legitimate interest of striving to provide a safe and rewarding work place. We will retain personal information we collect in the recruitment and selection process for up to one year following an application for employment which we receive either directly from you or via recruitment agencies. Further information about privacy and data retention is provided in our staff handbook for employees.

The legal basis for processing personal data for the purpose of market analysis is the pursuit of our legitimate interest in developing our business and undertaking marketing activities. We only acquire personal data directly from data subjects. We will retain personal information we collect through our business development processes for as long as we believe our products and services may be of interest to prospects, customers and former customers.

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## Provision of services to our customers

The legal basis for processing personal data for the purpose of providing services to our customers is either to fulfil our contractual obligations to customers or the pursuit of related legitimate interests including maintaining accurate records relating to accounting and finance and monitoring the quality of our services. We will retain personal information we collect through our service delivery processes for 7 years from the end of a tenancy or the last point of contact by the customer (whichever is later).

## Procurement of services

The legal basis for processing personal data for the purpose of procurement is the pursuit of our legitimate interest in maintaining efficient and effective procurement processes. Personal data we collect from suppliers and prospective suppliers is usually supplied directly by the data subject or their employer. We will retain personal information we collect through our procurement processes for as long as we need to comply with accounting and taxation rules, policies and conventions.

## Consent

We do not send unsolicited electronic marketing messages. Where we have explicit consent to contact prospective or current customers we will retain evidence of the details of consent which has been provided to process their information in this manner.

## LEGITIMATE INTERESTS OF EMPOWERING PEOPLE INSPIRING COMMUNITIES, OR THIRD PARTY

Empowering People Inspiring Communities, may use your information for other specific legitimate purposes such as:

- To ensure that content from our site is presented in the most effective manner for you and for your computer.
- To provide you with information, products or services that you request from us or which we feel may interest you, where you have either explicitly consented to or we believe you have a legitimate interest in.
- To carry out our obligations arising from any contracts entered between you and us, in particular the tenancy agreement between Empowering People Inspiring Communities and its tenants.
- To allow you to participate in interactive features of our service, when you choose to do so.
- To notify you about changes to our service.

We do not sell, rent or lease customer lists to third parties.

## INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

- Information that you provide by filling in forms on our websites ([www.epichousing.co.uk](http://www.epichousing.co.uk) or [www.northstaffsrenttobuy.co.uk](http://www.northstaffsrenttobuy.co.uk)) or by corresponding with us by phone, email or otherwise. The information you give us may include:

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- **Name and Company Name**
  - **Email address**
  - **Telephone numbers**
  - **Date of Birth**
  - **Nationality**
  - **Current and former addresses**
  - **National Insurance number**
  - **Current and former landlords**
  - **Personal details of people to be housed with you**
  - **Details of your income from employment, tax credits and welfare benefits**
  - **Details of savings over a specified amount**
  - **Details of any current or previous property you own either in the UK or abroad**
  - **Details of convictions that are relevant to your housing application and have not been spent under the terms of the Rehabilitation of Offenders Act 1974.**
- If you contact us, we may keep a record of that correspondence.
  - We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
  - If you contact us via our "About Us" page, we may keep a record of any CV's and Cover Letters sent.
  - Details of your visits to our web site and the resources that you access.

## RECIPIENTS OF THE PERSONAL DATA

Empowering People Inspiring Communities are required to transfer the personal information provided by its customers to third parties in order to fulfil contractual obligations. The following are categories of recipients that customer information could be transferred to:

- Repair and maintenance contractors
- Payment Providers
- Local Authorities in relation to Council Tax liability and Housing Benefit claims.
- Department of Work and Pensions in relation to Universal Credit claims and/or deduction of rent from welfare benefits.
- Utility Companies to ensure utility bills are processed correctly at the start and end of a tenancy
- Ministry for Housing, Communities and Local Government in relation to new lettings or sales of social housing
- Debt Collection Agencies – where your tenancy agreement with us ends and there is a debt still outstanding.

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All information you provide to us is stored on our secure servers. However, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

We will not disclose your information to any of the relevant third parties listed above for marketing purposes.

Our Data Protection Officer can provide you with contact details of our third parties upon request if required. You can do this by emailing [DPO@epichousing.co.uk](mailto:DPO@epichousing.co.uk).

## **DETAILS OF TRANSFERS TO THIRD COUNTRIES & SAFEGUARDS**

Data for our housing applicants is currently hosted by SurveyMonkey Inc. on secure servers in the United States of America. SurveyMonkey Europe UC has entered into contractual terms to include standard contractual clauses with SurveyMonkey Inc. for the transfer of data to SurveyMonkey Inc. as part of delivery of service. SurveyMonkey Inc. is located in the United States and accordingly, data (to include Respondent data) will be transferred to the United States.

SurveyMonkey Inc. participates in and has certified its compliance with the EU-U.S. Privacy Shield Framework. SurveyMonkey is committed to subjecting all personal information and data received from European Union (EU) member countries and Switzerland, in reliance on the Privacy Shield Framework, to the Framework's applicable Principles. To learn more about the Privacy Shield Framework, visit the U.S. Department of Commerce's Privacy Shield List. <https://www.privacyshield.gov/>.

We also use MailChimp to send emails to applicants and customers. We have signed a Data Processing Addendum with MailChimp to cover this arrangement. As a result, your name, email address, and mobile number may be transferred to the United States of America in order that we can send you email communications that are necessary for us to conduct business with you. This data transfer is also covered by the EU-U.S Privacy Shield Framework.

Aside from this, we ensure that all other personally identifiable information held on our customers and employees remains within the European Economic Area.

## **RETENTION PERIOD**

Empowering People Inspiring Communities, retain all customer information for 7 years after they last interacted with us unless:

- a) you ask us to remove it
- b) we believe that you are no longer interested in our business
- c) we no longer need it for the purposes it was collected.

Where there has been a period of 7 years and there has been no interaction between the organisation and the customer, their information is erased and securely disposed of.

## **RIGHTS OF DATA SUBJECTS**

As a Data Subject (individual) which Empowering People Inspiring Communities, process information on behalf of, you have the right to request access to, and the rectification or erasure of personal data that we hold about you as well as a right to object to and to a restriction of our processing of your personal data at any given time. You can do this

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through the contact details provided on page 1 of this policy. You can exercise the right at any time by contacting us at [DPO@epichousing.co.uk](mailto:DPO@epichousing.co.uk).

You also have a right to lodge a complaint with the Supervisory Authority (Information Commissioners Office (ICO) in the UK - at [www.ico.org.uk](http://www.ico.org.uk)), should you feel that we have not handled your information in line with legislative and regulatory requirements.

You have the right to make a Data Subject Access Request to Empowering People Inspiring Communities, Data Protection Officer if you wish to determine what information we hold on you. We will process these requests as soon as possible but in any event no later than 1 month after receipt.

## **AUTOMATED DECISION MAKING, INCLUDING PROFILING & INFORMATION ABOUT HOW DECISIONS ARE MADE, THE SIGNIFICANCE OF THE CONSEQUENCES**

We use email monitoring services to monitor the emails which we send to users. In doing this, we obtain information such as but not limited to:

- Time of receipt.
- Time of opening.
- Device used to open.
- Location it was opened in.
- Which parts of the email you interacted with.

## **IP ADDRESSES**

We may collect information about your computer, including where available your IP address, geographic location (if you allow when prompted by your browser), operating system and browser type, for system administration when you access our websites or our Customer Access Portal. We use this information for statistical data about our users' browsing actions and patterns when they access our website – logging IP addresses is used as a security feature of SurveyMonkey.

## **COOKIES**

To enable our systems to recognise your device and to provide features to you, we use cookies. For more information about cookies and how we use them, please read our Cookie Policy.

## **CHANGING YOUR PRIVACY SETTINGS OR UNSUBSCRIBING FROM OUR PRIVACY POLICY**

In the event that you wish to you alter your Privacy settings or opt-out, you are able to do this by emailing our Data Protection Officer at [DPO@epichousing.co.uk](mailto:DPO@epichousing.co.uk). Our Data Protection Officer shall provide you with contact details of our third parties upon request if required.

## **MARKETING COMMUNICATIONS**

We may send out email communication such as our newsletter to keep you up to date with all the latest news and information from Empowering People Inspiring Communities. If you wish to unsubscribe from these emails you can do so at any time by simply clicking either of the links in the header or footer and you will be removed from all such emails.

Please note that even if you decide not to subscribe to, or to unsubscribe, from promotional email messages, we may still need to contact you with important

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transactional information related to your account and your tenancy. For example, even if you have unsubscribed from our promotional email messages, we will still send you confirmations when you confirm services such as a repair from our Site.

## **CHANGES TO OUR PRIVACY POLICY**

We may change this Privacy Policy from time to time.

If we make significant changes in the way we treat your personal information, or to the Privacy Policy, we will make that clear on our websites or by email, so that you are able to review the changes.

## **CONTACT**

Questions, comments and requests regarding this privacy policy are welcomed and should either be emailed to [DPO@epichousing.co.uk](mailto:DPO@epichousing.co.uk) or addressed to Empowering People Inspiring Communities, 131-141 Ubbberley Road, Bentilee, Stoke-on-Trent, ST2 0EF.