

## Grosvenor Hart Homes support services privacy notice

The data controller for the purposes of the Data Protection Act and the General Data Protection Regulation is GHH (POC) Limited of 70 Grosvenor Street, London, W1K 3JP.

If you are in affordable housing with Grosvenor Hart Homes the data controller for housing management is Grosvenor Hart Homes Limited of 70 Grosvenor Street, London, W1K 3JP. If you are an affordable housing tenant your tenancy falls within the remit of this entity regulated by the regulator of social housing. For more information about how your personal information is managed if you are a Grosvenor Hart Homes tenant, please see the Grosvenor Hart Homes Tenant Privacy Notice, which can be accessed on the Grosvenor website under Privacy and Cookies.

GHH (POC) Limited strongly believes in protecting your privacy and the confidentiality of your personal information. To explain how GHH (POC) Limited collects, uses and protects personal information we have developed the following privacy notice. In this privacy notice, 'We' and 'Us' means GHH (POC) Limited.

This privacy notice applies to applicants and recipients of support services that meet the needs of local children, young people, and families.

### 1 Contact details

You can contact us with any questions you may have about privacy and/or data protection. Our contact details are: [hello@grosvenorhart.com](mailto:hello@grosvenorhart.com)

### 2 About this privacy notice

We explain in detail below the types of information that we collect, how and why we use that information, and what rights you have in connection with your personal information.

We must have a lawful basis to process your personal information, and this privacy notice explains what our lawful basis is in respect of each purpose for which we keep and use personal information about you. Generally, we are allowed to process your personal information where we have a legitimate interest to do so (but we will always consider whether your right to privacy overrides our interest).

### 3 What personal information do we collect about you?

#### 3.1 When you contact us for the first time

We may collect and use the following personal information about you:

- Identification and contact information, such as your full name, postal address, email address and telephone number(s)

#### 3.2 For support service purposes

We may collect and use the following personal information about you, so that we can understand you and your needs to help tailor our service to you:

- Age
- Information about your education and/or employment
- Support provided by a local authority and/or other statutory services
- Information about your housing
- Identification documents, such as your driving licence or birth certificate
- Benefit and council tax information to verify circumstances
- Financial information, such as your bank account details

- Confirmation of your right to live in the UK, references and other information required as part of the application process
- Video recordings such as CCTV for safety and crime reduction purposes

If appropriate we will collect sensitive information about you such as ethnicity, religion, sexual orientation, physical and mental health, and criminal offences. For further information about this, please see information on 'Sensitive personal information' and 'Information about criminal convictions' under the section on 'How we use your personal information'.

We may also collect personal information of other people associated with you, such as other members of your household, dependants, your next of kin, and emergency contacts.

### **3.3 Improving your experience**

With your consent we may use your name, photo, video, and experience with us for brochures, advertising, or press releases.

We will process your personal information if you contact us with compliments and/or complaints about our services.

If you attend our events, we may contact you for feedback on how they have helped you.

### **3.4 Additional services**

We pride ourselves on being active in the communities we work in. Your personal information may be used to help develop our services within localities.

We may collect and use the following personal information about you if you participate in any of our involvement or community projects.

## **4 Personal information we collect about you from other sources**

We may collect personal information about you from other sources. This may include the following:

- Under certain circumstances from the police, probation services, social care services, disclosure, and barring service and/or court service
- Publicly available information, from sources such as Companies House, the Electoral Roll, County Court Judgments, decrees for payment, and repossessions this may include details about your home, household, vehicles, financial situation, and debts
- Information you have shared publicly, including on social media

This list is not exhaustive, and, in specific instances, we may need to collect additional personal information for the purposes set out in this notice.

## **5 How do we use your personal information?**

### **5.1 Legal basis to use your personal information**

The principal legal bases on which we use your personal information are as: (a) to Allow us to enter and perform a contract, (b) to enable us to comply with legal obligations, and (c) in order to pursue legitimate interests of our own or those of third parties (provided your interests and fundamental rights do not override those interests).

### **5.2 Telling you about events and activities that we think may be of interest to you**

We may use your personal information to identify and tell you about events and activities that we think may be of interest to you. We will only do this by email where you have informed us that you would like to receive these communications via email. Whether you choose to receive this information via email is entirely up to you. Your choice will not affect your access to support. You can update your preferences by responding to our emails to you, or by contacting us (see contact details above).

We may also use your information to invite you to participate in market-research. If we do contact you about market-research, you do not have to participate. If you tell us that you do not want to receive market-research communications, we will respect this.

### **5.3 Change of purpose**

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **5.4 Sensitive personal information**

Sensitive Personal information, such as ethnicity, religion, sexual orientation, and physical and mental health requires higher levels of protection. We need to have further justification for collecting, storing, and using this type of personal information and this may require your explicit consent.

## **6 Who do we share your personal information with?**

### **6.1 Sharing your personal information internally**

We may share your personal information with our employees where this is necessary, such as for internal administration purposes. Your personal information will only be shared with such employees as are reasonably necessary for these purposes.

### **6.2 Sharing your personal information with third parties**

We may need to share your personal information with certain third parties, including third-party service providers, and we require third parties to respect the security of your personal information and to treat it in accordance with the law.

There are also certain exceptional circumstances in which we may disclose your personal information to third parties. This would be where we believe that the disclosure is:

- Required for your and/or your family's safety
- Required by the law, or to comply with judicial proceedings, court orders or legal or regulatory proceedings
- Necessary to protect the safety of our employees, our property, or the public
- Necessary for the prevention or detection of crime, including exchanging personal information with other companies or organisations for the purposes of fraud protection and credit risk reduction

## **7 How long do we keep your personal information?**

### **7.1 Application not progressed**

If you are not provided with support services or no longer want to be provided with support services, then we will not retain your personal information.

### **7.2 Support services provided**

All other personal information will be kept for up to 10 financial years after support to you has ended.

## **8 How do we protect your personal information?**

We will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this notice.

All personal information you provide to us is stored securely, including in a physically secure environment, on our secure servers.

Access to your personal information will be restricted to such employees and other individuals as are necessary for the purposes for which the information was collected.

Due diligence has been carried out to ensure that any third-party service providers also store your data securely and safely in line with data protection and information security requirements.

## **9 What rights do you have in respect of your personal information?**

### **9.1 You have the right to be informed**

We have a legal obligation to provide you with concise, transparent, intelligible, and easily accessible information about your personal information and our use of it. We have written this notice to do just that, but if you have any questions or require more specific personal information, you can contact us (see contact details above).

### **9.2 You have the right to access your personal information**

You have the right to ask us to confirm whether we hold any of your personal information. If we do, you have the right to have a copy of your information and to be informed of the following:

- Why we have been using your personal information
- What categories of personal information we were using
- Who we have shared your personal information with
- How long we envisage holding your personal information

To maintain the security of your personal information, we will have to verify your identity before we provide you with a copy of the information we hold.

### **9.3 You have the right to correct any inaccurate or incomplete personal information**

You have the right to amend any inaccurate personal information about you which we hold. If you need any support, please contact us (see contact details above).

### **9.4 You have the right to be forgotten**

There may be times where it is no longer necessary for us to hold personal information about you. This only relates to the following:

- The personal information is no longer needed for the original purpose that we collected it for
- You withdraw your consent for us to use the personal information (and we do not have another lawful reason to use it)
- You object to us using your personal information and we have no overriding reason to keep using it
- We have used your personal information unlawfully
- We are subject to a legal requirement to delete your personal information

In those situations, you have the right to have your personal information deleted. If you believe one of these situations applies to you, please contact us (see contact details above).

### **9.5 You have the right to object to participating in the focus groups and receiving emails from us about events and activities**

You can tell us at any time that you would prefer that we do not use your email address to be contacted about events and activities. If you would like to stop receiving emails about events and activities please

contact us (see contact details above) or respond to the emails that we send, and we will stop sending these immediately.

#### **9.6 You have the right to object to us using your personal information for our own legitimate interests**

Sometimes, we use your personal information to pursue our own legitimate interests, or those of third parties (please see 'How do we use your personal information?' above for more information about such interests).

We aim to always ensure that your rights and personal information are properly protected. If you believe that the way we are using your personal information is not justified due to its impact on you or your rights, you have the right to object. Unless we have a compelling reason to continue, we must stop using your personal information for these purposes.

To exercise your right to object to our use of your personal information for the purposes above, please contact us (see contact details above).

#### **9.7 You have the right to restrict how we use your personal information**

You have the right to ask us to stop using your personal information in any way other than simply keeping a copy of it. This right is available where:

- You have informed us that the personal information we hold about you is inaccurate, and we have not yet been able to verify this
- You have objected to us using your personal information for our own legitimate interests and we are in the process of considering your objection
- We have used your personal information in an unlawful way, but you do not want us to delete your personal information
- We no longer need to use the personal information, but you need it for a legal claim

If you believe any of these situations apply, please contact us (see contact details above).

### **10 Complaints**

If you wish to make a complaint about our collection or use of your personal information, please contact us in the first instance so that we may seek to resolve your complaint.

If you are not satisfied with our response, you have the right to lodge a complaint with the Information Commissioner's Office (ICO), the statutory body which oversees data protection law in the UK. This is the link to the [ICO website](#) if you wish to lodge a complaint with the ICO.