

Contents

What is Data Protection & GDPR	2
The information we collect and how we use it.....	2
Customer Portal	3
Glympse – Repairs Service	3
How we store and protect your information	3
How long we keep your information for and how we dispose of it	4
Who we share your information with and why.....	4
What communications we may send you.....	5
Your Individual Rights	6
Website Terms & Conditions	9
Our Data Protection Officer.....	10

What is Data Protection & GDPR

The General Data Protection Regulation (GDPR) provides directions for processing personal information. The GDPR applies to personal information we might hold about you on some paper files and on the systems that we use. The GDPR states that those who record and use personal information must ensure that it is handled properly. For that reason, we are required to ensure that your personal information is:

- Fairly and lawfully processed.
- Processed for limited purposes.
- Adequate, relevant and not excessive.
- Accurate and up-to-date.
- Not kept for longer than is necessary.
- Processed in line with your rights.
- Secure.
- Not transferred to other countries without adequate protection.

The Information Commissioner's Office (ICO) is responsible for regulating, enforcing and promoting good practice and transparency of organisations. Salix Homes Limited is registered with the ICO to demonstrate compliance with the GDPR and provide assurance that we use our customer & employee information appropriately.

The information we collect and how we use it

As a customer of Salix Homes, we may collect and process information about you and members of your household such as:

- Name and address.
- Contact details.
- Dates of birth for you and others who live in your household.
- Income details and history of rent payments.
- Information about your housing need, applications, transfer requests, health, etc.

We primarily collect this information to:

- manage your tenancy / lease and the Salix Homes property it relates to;
- monitor compliance with the terms of your tenancy / leasehold agreement;
- deliver support to you or any member of your household;
- conduct surveys in order to monitor and improve our services; and
- monitor equality and diversity

All calls made to our Contact Centre and our Communities Directorate (i.e. a Neighbourhood Officer, or an Income Officer) are recorded for training and monitoring purposes. All recorded calls are held within a UK based secure cloud for a maximum period of 12 months. The call recordings can only be accessed by a small group of 10-15 employees within the business for security purposes.

Occasionally we may collect personal information which includes details about your ethnicity, religion, sexual orientation and any medical conditions. We understand that you may not feel comfortable answering some of these questions and consider them to be private. We ask these questions to make sure that we do not discriminate against any of

our customers and because we recognise that a person's age, disability, ethnic origin, religion, sexual orientation or medical condition may affect their choice of home, the area they want to live, and the services they need.

Understanding the diversity of our customers is very important to us and helps us work towards providing homes and services that meet everyone's current and changing needs. If you feel uncomfortable providing this information, you can refuse.

Customer Portal

Salix Homes has created a customer portal called MySalix, accessible via our website where customer can self-serve by creating an online account. Using My Salix, you can:

- Pay your rent;
- Review your rent balance and all rent transactions;
- Report an issue including repairs (including changing or cancelling an existing appointment), environmental, anti-social behaviour, tenancy fraud and tenancy management;
- View your existing cases, read portal messages and send messages from within a case;
- Give feedback – you can log both compliments and complaints;
- Apply for tenancy changes such as mutual exchange, succession and assignment, Right to Buy/Acquire and link through to Salford Home Search to make a housing application;
- View your neighbourhood officer and neighbourhood area;
- Add a household member (this option is only available to high rise customers); and
- Update your personal details;

For further information, or to sign up, go to www.salixhomes.org/mysalix .

Glympse – Repairs Service

When a repair has been arranged, you are able to track the repair progress on your mobile or tablet via the My Salix portal. The following information is available to you so that you are able to track your repair:

- Name and photo of the repair person;
- Your repair slot;
- Where the vehicle is and estimated arrival time;
- Customer satisfaction survey following the completion of the repair.

Salix Homes uses a software called Glympse to deliver this service to you.

How we store and protect your information

Information is held in paper files and on our computer systems. All of our files and computer systems have restricted access, which means that only the employees who need to see that type of information can see it.

Salix Homes uses software and storage that is predominately based within the UK. In some rare instances, mainly in relation to the information captured on our website, there

may be data stored in the US. The information is stored with companies that have incorporated the data sharing between the UK and US into the terms and conditions and standard contracts. Which means data transferred outside of the EU (to approved compliant areas or organisations) is acceptable based on the ICO's current guidance.

Our network and infrastructure is protected by industry leading and globally recognised firewalls.

We also use reputable antivirus and endpoint protection software and this is used to block executable files from running from removable media such as CD-ROMs, external hard drives or USB drives.

Our websites use HTTPS as standard and we regularly monitor our systems for possible vulnerabilities and breaches.

Our infrastructure provider conducts independent penetration testing of their network regularly to identify any vulnerabilities.

How long we keep your information for and how we dispose of it

Salix Homes has a Retention Schedule for each type of personal information that we collect such as financial details and health records.

This document states how long we will keep different types of information for. The Retention Schedule is based on legal guidance and best practice.

Once information has passed its retention deadline, it will be deleted. There are some instances with the software we use that mean we cannot delete the information, as the software does not allow us to do so. When this happens, your personal information will be anonymised or pseudonymised on the system and archived. In some circumstances, our ICT Team are able to delete your information using scripting tools.

Who we share your information with and why

There may be occasions when we must share information with others to enable us to deliver our services and fulfil our legal and contractual obligations. Examples include:

- in relation to your repairs;
- in relation to your rent;
- in relation to your benefit requirements;
- for statistical purposes;
- for legislative and regulatory purposes;
- for the safeguarding of vulnerable adults and children.

Relevant information may be shared with:

- our contractors;
- our insurers and solicitors;
- other housing associations;
- the government;
- local authority;
- regulators;

- social services;
- the police;
- the fire service;
- health professionals; and
- other organisations we engage to perform data processing on our behalf.

Where we are legally required to do so, we will share information in the following circumstances:

- Prevention or detection of crime.
- Prosecution of offenders.
- Assessment or collection of tax or duty owed to customs and excise.
- In connection with legal proceedings or insurance matters.

Below is a table containing links to the Privacy Statements of some of the organisations which we regularly share information with:

Name of Organisation	Link to Privacy Statement
Ministry of Housing, Communities & Local Government	http://ovh.org.uk/wp-content/uploads/2018/06/MHCLC-Privacy-Notice-for-new-social-housing-tenants-buyers.pdf
Salford City Council	www.salford.gov.uk/your-council/council-and-decision-making/data-protection-legislation/
HMRC	www.gov.uk/government/publications/data-protection-act-dpa-information-hm-revenue-and-customs-hold-about-you
MARAC	www.manchestersafeguardingboards.co.uk/privacy-policy/

We will aim to obtain a Data Sharing / Processing Agreement with every organisation we share information with. The Agreement makes clear to the other organisation:

- how they are to use the information;
- who can have access to it;
- how long they can keep the information for;
- how to dispose of the information;
- what security measures they must have in place;
- what process to follow if a customer makes an Individual Rights request;
- what process to follow in the event of a data breach.

Each Data Sharing/Processing Agreement is regularly reviewed and we only share information that is absolutely necessary.

What communications we may send you

Salix Homes uses various communication methods to keep all customers updated on community events, provide information relating to each neighbourhood and to provide offers to all of our customers. We use the following methods to provide these types of information to our customers:

- Newsletters.
- E-newsletters.

- Magazines.
- Texts.
- E-mail.
- Phone Calls.

We will send you information on the following:

- events in your community
- services from our partners
- news and updates affecting your neighbourhood and services
- getting involved in your community
- job and training opportunities

You can opt out of these communications at any time using any of the below methods by:

- calling our contact centre on 0800 218 2000
- emailing our Data Protection Officer at datarequests@salixhomes.co.uk
- completing the below web form: www.salixhomes.org/gdpr-opt-out

Your Individual Rights

The GDPR and the Data Protection Act 2018 details data rights for all individuals. These rights are outlined below:

- a. The right to be informed.
- b. The right of access.
- c. The right to rectification.
- d. The right to erasure.
- e. The right to restrict processing;
- f. The right to data portability;
- g. The right to object.
- h. Rights in relation to automated decision making and profiling.

The guidance below demonstrates how Salix Homes customers can exercise each of their rights.

The right to be informed

All Salix Homes communications are sent out to our customers in a clear and easy to read format, through various different channels such as letters, e-mails, texts and via news articles on the website.

All of the personal information that Salix Homes holds is gathered directly from our customers, to enable us to provide your home and the services that you may wish to access. Details on how we use this information can be found within this Privacy Statement and other Privacy Notices.

The right of access

All customers have the right to access the information that Salix Homes may hold on them. This is called a Subject Access Request and can be made to any member of staff both verbally and in writing. When submitting a subject access request, the Information

Commissioners Office advises the following:

Do

- clearly label your request (e.g. use 'subject access request' as your email subject line or a heading for your letter);
- add the date of your request;
- include your name and any aliases, if relevant;
- detail any other information that may assist the organisation to identify or distinguish you from other individuals (e.g. customer account number or employee number);
- include your up-to-date contact details;
- be specific when detailing the personal data that you want access to, based on what you need;
- add any details, relevant dates, or search criteria that will help the organisation identify what you want;
- inform the organisation how you would like to receive the information (e.g. by email or printed out). and
- where possible, send your request directly to the individual or team who deal with subject access requests, such as the data protection officer.

Don't

- include other information with your request, such as details about a wider customer service complaint;
- issue a request for all the information the organisation holds on you, unless that is what you want (if an organisation holds a lot of information about you, it could take them longer to respond, or make it more difficult for you to locate the specific information you need in their response); or
- use threatening or offensive language.

Salix Homes will endeavour to ensure that 100% of individual rights requests are complied with within one calendar month, however, excessive requests may also take longer to respond to. If this is the case, the information will be provided to you within two calendar months.

To assist you with a subject access request, Salix Homes has an Individual Rights Request form which can be used to submit your request. Further information regarding Individual Right Requests, and the Individual Rights Request form, can be found on our website here: www.salixhomes.org/about-us/policies-procedures

The right to rectification

Salix Homes strives to ensure that our customers' information is kept accurate and up to date, however, on rare occasions, incorrect or incomplete information may be logged onto our systems.

Salix Homes encourages customers to keep us up to date with their contact details so that our records are accurate at all times. Should any of your details change, please do not hesitate to inform us. This can be done via our contact centre by phoning 0800 218 2000 or by using the My Salix portal.

The right to erasure

The right to erasure is also commonly known as "the right to be forgotten". Salix Homes customers can request for their personal information to be removed or deleted.

Salix Homes customers should be aware that, under certain circumstances, we are able to refuse the request of erasure. In the event of us refusing your request, we will inform you why your request has been refused and offer alternative solutions, such as minimising the information and archiving with limited colleague access.

The right to restrict processing

You can submit a request to restrict processing of your personal information in the following circumstances:

- If you have put in a rectification request, as some of your information is inaccurate, you can also request that we do not further process the information until the necessary corrections have been made.
- In the extremely rare likelihood that your personal information has been unlawfully processed, and you do not wish for your information to be erased, you can request that we restrict further processing of the information.
- Should your information be required in relation to a legal claim, however our retention period has passed, you can request that the personal information only be used for storage purposes and not for further processing.

The right to data portability

Data portability means that you can request Salix Homes to transfer your personal information in a safe and secure way to another organisation that you hold your information with. A good example of data portability is explained below:

Should you decide to terminate your tenancy with Salix Homes and enter into a new tenancy agreement with another housing provider, with your consent, we will transfer your personal information over to the new provider including, for instance, contact details, account details, rent history and any arrears information.

The right to object

All Salix Homes customers have the right to object to their personal information being processed for profiling purposes.

You can object to processing by calling the Contact Centre on 0800 218 2000 or contacting the Data Protection Officer at datarequests@salixhomes.org.

Rights relating to automated decision making and profiling

Salix Homes may use profiling for the following purposes, but is not limited to:

- To analyse customers' economic position so that, if help/assistance is needed, it is available before or at the moment it is required.
- To monitor for fraudulent activity.
- To offer services and provide information that we believe may be of use to our customers, based on their personal preferences and/or behaviour, for example, sending out community event leaflets, in line with the events you told us you would be interested in attending upon signing your tenancy agreement.

As a Salix Homes customer, you can request that we do not use your personal information for profiling activities.

Website Terms & Conditions

Whilst using the Salix Homes website, Salix Homes may collect personal information from users. The information that the website collects, by itself or through third parties, is:

- Cookie and usage information.
- Other personal formation, as described in other sections of this policy or by means of a dedicated, contextual explanation provided at the point of information collection

The information may be freely provided by the user or collected automatically when using the website.

Any use of Cookies - or of other tracking tools - by Salix Homes' website, or by the owners of third party services used by this website, unless stated otherwise, serves to identify users and remember their preferences, for the sole purpose of providing the service required by the user.

Failure to provide certain information may make it impossible for this website to provide its services.

How the website collects the information and where it is stored

Methods of processing

- Salix Homes processes your information in a proper manner and shall take appropriate security measures to prevent unauthorised access, disclosure, modification, or unauthorised destruction of the Information.
- The information is processed using computers and/or IT enabled tools, in line with Salix Homes' procedures, for the purposes explained in the "The information we collect from you and how we use it" section.

Analytics.

The services contained in this section enable Salix Homes to monitor and analyse web traffic and can be used to keep track of how you use our website. Salix Homes uses Google Analytics (Google), which is a tool for analysing the use of our website (including time of visit, pages visited, type of browser, type of operating system, IP address etc.).

Google Analytics may also be used to prepare reports on its activities and share them with other Google services. Google may use the information collected to contextualise and personalise the ads of its own advertising network.

Google Analytics is currently covered by Standard Contractual Clauses.

Additional information about the collection and processing of your information

Legal action

Your information may be used for legal purposes by Salix Homes, in Court or in the stages leading to possible legal action arising from improper use of our website or related services.

System Logs and Maintenance

For operation and maintenance purposes, Salix Homes' website, and any third party services, may collect files that record interaction with the website (System Logs) or use for this purpose other information (such as an IP Address).

Our Data Protection Officer

If you require any further information on Data Protection or how Salix Homes uses your personal information, please contact our Data Protection Officer, Peter Gwin, using the below details:

Data Protection Officer

Salix Homes
Diamond House
2 Peel Cross Road
Salford
M5 4DT

datarequests@salixhomes.co.uk

0800 218 2000

Salix Homes has recently introduced a new video service for deaf or hard of hearing customers (details can be found via the intranet link below):

www.salixhomes.co.uk/news/salix-homes-launches-new-video-service-deaf-customers