

# **Privacy Notice**

# 1. Summary

This Privacy Notice is a public document available to anyone and applies to applicants of Grŵp Cynefin (through the project known as Tai Teg) and its purpose is to explain how Grŵp Cynefin collects and processes personal information in order to conduct normal business activities as a conglomeration of UK charitable housing associations and local authorities, working together to provide affordable housing solutions in North Wales and Powys. As Registered Social Landlords (RSLs) and Local Authorities (LAs), both are regulated by Welsh Government.

### Normal activities can be summarised as:

- 1. Providing affordable housing in partnership with all our partners.
- 2. Completing financial assessments to ensure affordability.
- 3. Providing affordable housing options / advice.

# **Our Mission**

To provide an online service and connecting people with affordable housing opportunities.

# 2. Who we are

Tai Teg host the online service which connects people to affordable housing opportunities. The Data Controller is 'Grwp Cynefin' and can be contacted via Ty Silyn, Pen y Groes, Caernarfon, LL54 6LY Tel: 03456 015605. The company Data Protection Officer can be contacted via post@grwpcynefin.org.

# 3. How we collect your information

Tai Teg collects information from you via a variety of sources, including its listed partners\*, when you apply for one of our properties or services, complete one of our forms, when you call, write, e-mail or meet with us or respond to a survey. We may also collect information when you use our social media sites and websites.

When you complete our online Application, at section 8 you are providing your Consent under Article 6(1)(a) of the GDPR for Grŵp Cynefin to process and share your personal data.

Where we process your special category data, we rely on the Condition of Explicit Consent under Article 9(2)(a) of the GDPR.

We may take photographs at our events, at our properties and in our communities to use for general marketing and publicity. However, photographs of individuals will only be used for those purposes with your consent.

# We may receive information about you from third parties including:

- Councillors, MPs or other representatives acting on your behalf/instruction.
- Referrals from our partners.

# Our Partners

# There are 14 partners involved in the register:

- Cartrefi Conwy (<u>https://cartreficonwy.org/privacy-policy/</u>)
- Conwy County Borough Council (<u>https://www.conwy.gov.uk/en/Council/Access-to-Information/Privacy-Notices/How-Conwy-County-Borough-Council-uses-your-Information.aspx</u>)
- Denbighshire County Council ( <u>https://www.denbighshire.gov.uk/en/documents/your-</u> <u>council/strategies-plans-and-policies/policies/customers-and-feedback/data-protection-</u> <u>policy-and-procedures.pdf</u> )
- Flintshire County Council / New Homes ( <u>https://www.flintshire.gov.uk/en/Resident/Contact-Us/Privacy-Notice.aspx / https://www.northeastwaleshomes.co.uk/en/Documents/Privacy-notice.pdf</u>
- Gwynedd Council (<u>https://www.gwynedd.llyw.cymru/en/Council/Information/Privacy-notices-and-cookies.aspx</u>)
- Powys County Council (<u>https://en.powys.gov.uk/article/644/Data-Protection-and-Privacy</u>)
- Wrexham County Council ( <u>https://www.wrexham.gov.uk/service/privacy-notices</u> )
- Isle of Anglesey County Council (<u>https://www.anglesey.gov.uk/en/Council/Data-protection-and-FOI/Council-Services-Privacy-notices.aspx</u>)
- Adra (<u>https://www.adra.co.uk/en/privacy/</u>)
- Clwyd Alyn / Pennaf (<u>https://www.clwydalyn.co.uk/privacy-policy/</u>)
- Grŵp Cynefin ( https://www.grwpcynefin.org/en/about-us/policies/ )
- The Snowdonia National Park ( <u>https://www.snowdonia.gov.wales/\_\_data/assets/pdf\_file/0020/252164/Privacy-Statement\_Saesneg.pdf</u>)
- North Wales Housing ( https://www.nwha.org.uk/about-us/data-protection/ )

Please see partner links for direct information about how they process your personal data. Partners will promote and market Tai Teg to raise awareness of the possible schemes available.

# 4. What information we collect about you

#### 4.1 The information we require from you as an applicant includes:

- Full name (and proof of your identity / photo ID).
- Date of birth.
- National Insurance number (your unique identifier).
- Contact details (phone, e-mail or correspondence address).
- Basic details (name and DOB, gender) of all household residents.
- Current & previous addresses.
- Current/former Landlord details.
- Employment details.
- Details of Income.
- Financial information we will use this to identify the most suitable affordable housing option.

#### 4.2 Once registered and applying for a property, we will need to collect:

- Card details if you pay by card (however card details are not stored).
- Proof of housing eligibility, any interest or equity in other property.
- Minimum of 3 months of full recent bank statements.
- Minimum 3 months recent payslips.
- Proof of any other income (Tax credit /entitlement letter of private pension).
- Proof of citizenship (if applicable).
- Proof of savings (ISA, Bonds & Shares).
- Proof of I.D. (Passport/Birth Certificate/Driving Licence).
- Proof of residency (Utility bills/ electoral roll).
- P60.
- Bank Loans, Credit/Store cards, details of any other debt (If applicable)
- Child care charges (If applicable).
- Certificate SA302 for the last 3 years or details from accountant (If self-employed).
- Other relevant information (which may include special category data that you chose to share with us, with your explicit consent).

# 5. What processing we do with information collected

The information we require from you is used to manage your application through the Tai Teg Contract with our partners.

Data will be shared at the request of a Local Authority in order to check the applicant on the Tai Teg register against the Common Housing Register.

# The processing activities we conduct can be summarised as:

Referring you to our partners when a suitable property/accommodation is identified/becomes available.

Tai Teg conducts research and statistical analysis to help improve our business processes and the services offered to our customers. When possible, statistical information is anonymised or pseudonymised.

Tai Teg conducts surveys regularly and periodically relating to our services in order to gauge satisfaction and make improvements based on feedback.

Tai Teg operates a range of information and communications systems and technologies for efficient operation of the business. Personal information is stored and managed within those systems which are maintained to achieve a high level of confidentiality including following best practice cyber security standards.

# 6. Children's and other residents of the property information

Tai Teg keep a record of children's basic information if they are resident at your property, including their name, gender and date of birth. This is required for recommending a suitable size property.

This is also applicable for any other adults who live with you as a household.

# 7. How we will communicate with you

Tai Teg needs to communicate with our applicants, and this will usually be by email or by telephone. Many of our services are on-line as this is usually more convenient for you and more efficient for us.

## 8. Who we share data with and how long we keep information

Tai Teg shares personal data with partners when a suitable property comes available and when you have applied for that property and being assessed as being suitable.

We may share your information with a language translation service, if it is necessary to translate any information into or from a foreign language for you.

Tai Teg may need to share personal information with government departments and agencies, with our regulator and auditors, with local authorities, and housing associations where we are legally allowed to do so.

We may need to share information with solicitors, insurers, agents, mortgage brokers, financial advisors, credit reference agencies, court agents, surveyors, valuers relating to a property.

In some cases, we may have a duty to disclose your information by law to:

- Our partner organisations whose purposes are compatible to ours
- Other housing associations
- Local Authorities, regulators and government departments
- Others who may need information from us for their own purposes (for crime prevention or detection, for the prevention and detection of fraud.)
- Check your data against the common housing registers, to identify if applicants are registered on both registers

Information provided by the Applicant will be retained for up to 7 years and in accordance with Grŵp Cynefin's Document and Data Retention Policy.

# 9. What we will not do

- We will not send you unsolicited marketing material.
- We will not sell your personal data on to third parties.
- We will not pass on your personal data to unrelated third parties unless we are allowed or required to do so by law or we have your explicit permission to do that.

# 10. Your rights, the right to complain and the ICO

You have the right to request a copy of the data we hold about you as well as other applicable rights under current data protection legislation. Please contact <u>info@taiteg.org.uk</u> if you wish to request access to any of your personal data and we will always endeavour to answer your questions as part of our friendly, helpful service.

We will respond within 1 calendar month.

It will always help if you can be as specific about what personal data you want to see, what it relates to and within what timeframe, as that will assist our search.

You have the right to correct information that we hold. Please advise us of any changes or corrections by contacting info@taiteg.org.uk.

You may withdraw your consent to use any information that was previously provided with your consent. Please advise us if you wish to withdraw any consent previously given to <u>info@taiteg.org.uk</u>

You also have other rights which can be seen by visiting the Information Commissioner's Office (ICO) website and reading about Data Protection law at <u>https://ico.org.uk</u>

You have the right to complain about any matter relating to our service, including how we use your personal data:

- In the first instance please contact our Customer Services team at info@taiteg.org.uk
- You can also contact the Local Authority directly in the area that you live. Please ask for contact details.
- If you are still not happy with our service you may complain to the Public Services Ombudsman Service at <u>http://www.housing-ombudsman.org.uk/</u>.
- If you wish to complain about our use of your personal data you may complain to the UK Information Commissioner's Office (ICO) at <a href="https://ico.org.uk/">https://ico.org.uk/</a>.

# **11. Further information**

For further information about Tai Teg, please see our website at <u>https://taiteg.org.uk/en/</u>

Tai Teg will hold your information on a secure server which is run by Grwp Cynefin. Access to user information will not be allowed **without** prior consent from Tai Teg. The server has been tested and appropriate technical security measures are in place to ensure compliance with Data Protection requirements.

# 12. Changes to our Privacy Notice

Our Privacy Notice is regularly kept up to date and this version was updated on 08.08.2021 The latest full version is always available from our website.