

Redwing Living Privacy Notice

Redwing Living has been established for over 30 years. It offers private rented properties, leasehold and apartment block management and shared ownership and sales, managing over 2,000 homes and retirement properties across the North West.

The company also owns and manages commercial premises. It is a non-charitable, wholly owned subsidiary of Regenda Ltd, a society registered under the Co-operative and Community Benefit Societies Act 2014, registered with the Homes and Communities Agency (L0877).

This privacy notice tells you what to expect when Redwing Living collects personal information. It applies to information we collect about:

- people who use and/or enquire about our services
- visitors to our websites
- job applicants.

1. What is data protection?

The General Data Protection Regulation (GDPR) and Data Protection Act (2018) set out rules for processing personal information. This applies to personal information we might hold about you on some paper files and on computers. The Act states that those who record and use personal information must ensure that it is handled properly. Therefore, we are required to ensure that personal information is:

- processed in a lawful, fair and transparent way
- held only for the purposes we collected it for
- adequate, relevant and limited to what is necessary
- accurate
- held only for as long as we need it
- kept secure.

The Information Commissioner's Office (ICO) is responsible for regulating, enforcing and promoting good practice and transparency in the access and use of personal information.

Organisations have to notify the ICO of all the purposes for which they will be processing information. We are happy to supply you with a copy of the notification upon request or you can contact the ICO by calling 0303 1231113, or writing to the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

You can find out more information online at www.ico.org.uk.

2. What information does Redwing Living collect about its customers?

We begin the process of collecting information about you, and if appropriate, your family, when you apply to us either directly or through one of our property advertising portal partners. Although the information we collect may vary,

typically it may include:

- name and address
- contact details
- details of your contact with us
- gender and dates of birth for you and others who live in your household
- income details
- housing status
- budget for rental or purchase
- where you want to live
- information on housing need for you and others who live in your household
- information on adaptations, applications, transfer requests, etc.

Redwing Living may also collect special categories of personal data, including:

- race or ethnic origin
- health and medical conditions
- religion
- sexual orientation.

We understand that you may not feel comfortable providing some of this information and consider it private. We ask some of 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 help us work towards providing homes and services that meet everyone's needs.

If you feel uncomfortable providing this information, you can say no.

3. How we collect information about you

We collect information in a variety of ways, including:

- When customers apply for a home
- When customers sign a tenancy agreement or lease
- Through ongoing contact with customers during their tenancy/lease
- When customers request or access services
- Recording calls to and from us
- When customers terminate a tenancy/lease
- If a customer makes a complaint
- When dealing with Anti-social behaviour (ASB) cases.

4. Why do we collect this information?

Redwing Living collects this information for a number of reasons, including:

- To manage leases and tenancies
- To help you in finding a suitable home to buy, rent or on a shared

- ownership basis
- To support you in maintaining your tenancy/lease
- To provide a repairs and maintenance service
- To resolve ASB disputes
- To investigate complaints
- To meet our management obligations and service charge reporting
- To engage with customers to get feedback on our services
- To process requests from third parties, for example, Council Tax
- For monitoring diversity and equality which helps to tailor services accordingly
- In cases of prevention and detection of crime
- For regulatory purposes
- For legal requirements.

5. Sharing your information

We will not share your personal information without your consent, unless allowed by law. Examples of organisations we may share your information with, where appropriate to manage your tenancy or lease or with your permission, are:

- Contractors
- Local Authorities
- Housing Benefit
- Department for Work and Pensions
- Social Services
- Housing Ombudsman Service
- Ministry of Housing, Communities & Local Government (MHCLG)*
- Police
- Probation Service
- Other landlords
- Utilities companies
- Council tax
- Debt recovery agencies
- Third Parties including mortgage advisers, Help to buy agents
- Courts
- Health Service Providers, including the National Health Service (NHS)

* For further information on how the Ministry of Housing, Communities & Local Government (MHCLG) uses your personal information, please see a copy of their Privacy Notice at <https://core.communities.gov.uk/>

6. What is the legal basis for our use of your personal information?

Redwing Living needs to process your personal data in order to manage your tenancy/lease or deal with your enquiry.

This includes but is not limited to the following set out within the GDPR:

- Article 6.1(a) – the data subject has given consent
- Article 6.1(b) – processing is necessary for the performance of a contract

- Article 6.1(c) – processing is necessary for compliance with a legal obligation
- Article 6.1(d) – processing is necessary to protect the vital interests of individuals
- Article 6.1(e) - processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller

For the processing of “special category data” such as someone’s physical and mental health:

Article 9.2(g) of the GDPR

Processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

The processing of special category under Article 9 also requires the following conditions for processing from the UK Data Protection Act 2018 to be met:

- Schedule 1, Part 2 section 6(a), processing is met under the exercise of a function conferred on a person by an enactment
- Schedule 1, Part 1 section 2(1), this condition is met if the processing is necessary for health and social care purposes

Redwing Living has signed tenancy agreements or leases in place with all its customers and by signing your tenancy agreement or lease, you give us permission to process your data.

7. How long do we keep your personal information?

All of your information, correspondence, and notes about your tenancy/lease will be held in our secure housing management system and some information might be kept within our secure email and IT systems.

We keep some of your information for 6 years following the termination of your tenancy/lease. If your case has been subject to an insurance claim or other dispute, we may keep the data for 16 years.

All personal data is securely destroyed when no longer required. Electronic files are deleted in such a way that they cannot be retrieved, and all paper records are disposed of in confidential shredding bins.

8. How do we take care of your personal information?

Information is held in paper files and on our computer systems. Not all members of staff are able to access this information, only those who need to. We use the information to deliver a service to you. There may be occasions when we have to share information with others (detailed in section 5) to enable us to deliver our

services and fulfil our legal and contractual obligations. We are legally required to share information in the following circumstances:

- safeguarding
- prevention or detection of crime
- apprehension or prosecution of offenders
- assessment or collection of tax or duty owed to customs and excise
- in connection with legal proceedings
- public health
- to comply with the law.

9. Importance of accuracy

During the course of your tenancy/lease your needs may change so we will update our information to make sure we can provide services that meet your needs. To do this our neighbourhood team may visit you, or we might ring you or ask you for information to find out if your circumstances have changed. Any new information will be protected in the ways already outlined.

If any of the information we send is incorrect or inaccurate, please tell us so we can make the necessary changes.

10. What if someone is acting on your behalf?

If you have asked someone to act on your behalf (such as the Citizens Advice Bureau or a relative) you will be asked to supply an Authority to Act form, which you can get from the agency acting on your behalf or from Redwing Living.

11. Marketing and Communication

11.1 The Marketing and Communication Team may collect the following types of personal data:

- Images
- Video footage including interviews

We may also collect:

- Your name, age, address and contact details (email, telephone number and/or postal address).
- Name of group/organisation or event.
- If it is for consent for a child aged 13 or under, or a vulnerable adult - the name of the consentor and their relationship to you.

11.2 We may collect your personal data in a number of ways:

- Through a consent form
- By an authorised representative e.g. employed photographer at organised events

11.3 What is our lawful basis to obtain and use this personal data?

When we collect and use your personal information we rely on the following lawful basis:

- Consent: You or a representative have given consent.
- Legitimate interest – processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party

11.4 What does the communications and marketing team use your information for?

We use images to promote services across the Regenda Group.

Images and footage may be published on any of the following channels:

- press and media (including newspapers, magazines, websites)
- on our websites (including Petrus and Regenda)
- on our social media feeds including LinkedIn, Twitter, Facebook and other corporate social media accounts in the future
- in our printed publications such as newsletters, brochures, flyers and display materials
- in our electronic newsletters
- Media releases

The images/footage will often be accompanied by the details of your story, however, we will not use personal details or full name of any individual in an article.

If you no longer wish for your image or personal information to be used, please contact us and ask us to remove them from the archive. ***Please note that we will be unable to remove any images or content in printed materials or video footage if it has already been produced or remove images and quotes that have already been published by the media.***

12. Visitors to our websites

When someone visits www.redwingliving.co.uk we use third party services, Google Analytics and Hotjar to collect standard internet log information and details of visitor behavior patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

You may prevent your data from being analysed by Google Analytics by downloading and installing the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout/>. Google's ability to use and share information collected by Google Analytics about your visits to this site is restricted by the Google Analytics Terms of Service, available at

<http://www.google.com/analytics/terms/us.html>, and the Google Privacy Policy, available at <http://www.google.com/policies/privacy/>. To learn more about how Google collects and processes data in connection with Google Analytics, visit <http://www.google.com/policies/privacy/partners/>.

You can opt-out of tracking by Hotjar here: <https://www.hotjar.com/opt-out> and can learn about Hotjar's ability to use and share information through the Hotjar Terms and Conditions of Use, available at <https://www.hotjar.com/terms>, and the Hotjar Privacy Policy, available at <https://www.hotjar.com/privacy/>.

When you use our website, no user-specific data is collected by either Redwing Living or any third party. We use Google Analytics for trend reporting and visitor behaviour to help us improve our website and search functionality.

When you use our customer portal, you are able to view information held in our housing management system, including personal details, account statements, tenancy information, repair history and pay your rent / service charges. Please note that we use a third-party provider, Verseone to support our customer portal.

12.1 Security and Performance of the Redwing Living website

Redwing Living uses a third-party service to help maintain the security and performance of the Redwing Living website. To deliver this service it processes the IP addresses of visitors to the Redwing Living website. This information is not used for identifying purposes, except for investigation if an intrusion occurs.

12.2 Use of cookies by Redwing Living

This site uses cookies. Cookies are small text files placed on your computer by the websites you visit. They are used to help make websites work efficiently. You can control cookies through the settings of your web browser. To find out more, visit www.aboutcookies.org or www.allaboutcookies.org.

These are the cookies we use:

Google Analytics - to monitor website use and the type of browser that is accessing the website

Hotjar – to monitor website and page usage.

13. People who contact us via social media

We use a third-party provider, Hootsuite to manage our social media interactions. If you send us a private or direct message via social media the message will not be shared with any other organisations.

Redwing retains social media messages for 3 months.

14. People who call our Customer Contact Centre

When you call Redwing Living via Regenda Homes Customer Contact Centre, these calls are recorded for training and monitoring purposes. We use this information to help improve efficiency and effectiveness.

Our Customer Contact Centre can offer a translation service for customers when English is not their first language. This is provided by a third-party company, LanguageLine Solutions. This company does not retain any information from the calls or record them.

Redwing retains calls to the Customer Contact Centre for 3 months.

15. People who email us

Redwing Living emails are encrypted at rest and in transit, using several strong encryption protocols, and technologies that include Transport Layer Security/Secure Sockets Layer (TLS/SSL), Internet Protocol Security (IPSec), and Advanced Encryption Standard (AES). If your email service does not support the same encryption, you should be aware that any emails we send or receive may not be protected in transit.

We will also monitor any emails sent to us, including file attachments, for viruses or malicious software.

Redwing Living use web beacons on our websites and in our emails. When we send emails, we may track behavior such as who opened the emails and who clicked the links. This allows us to measure the performance of our email campaigns and to improve our features for specific customers. To do this, we include single pixel gifs, also called web beacons, in emails we send. Web beacons allow us to collect information about when you open the email, your IP address, your browser or email client type, and other similar details.

Emails are retained for 15 months.

16. What are your rights

16.1 Right of access to your data

If we hold personal information about you, you have the right to ask us:

- what we use the information for
- to provide you with a copy of the information you are entitled to
- to supply you with details of the purposes for which we use the information and who it is shared with
- for incorrect information to be corrected.

This can be requested either verbally or by completing a Subject Access Request form.

We have one month from the date we receive your request to provide you with the information.

16.2 Right to rectification

If you think that Redwing Living is holding incorrect personal information about you, you have the right to have this personal information amended.

Once you have advised Redwing Living of the details of the incorrect data and the required amendments, your data will be updated within 30 days. If your personal data cannot be amended, Redwing Living will advise you in writing why this is the case.

16.3 Right to be forgotten

You have the right to have your personal information erased if it is no longer required to manage your tenancy/lease or your enquiry.

16.4 Right to restriction of processing

You have the right to restrict the processing of your personal data if it is no longer required to manage your tenancy/lease or to handle your enquiry. This means that Redwing Living cannot further process your data, for example we cannot share your data with a third party.

16.5 Right to data portability

You have the right to have your personal data transferred to another data controller. For example, if you move home, Redwing Living will transfer your data to another housing provider.

16.6 Right to object

You have the right to object to the processing of your personal information if the data is not required to manage your tenancy/lease or enquiry, or you have not given Redwing Living permission to process your data, for example, for direct marketing.

17. Job applicants

Regenda Homes is the data controller for the information you provide during the employment recruitment process.

The following explains how Regenda uses the information you provide in your application, along with your rights, our reasons for requesting it and who will have access to it.

17.1 What information do we collect?

We collect information the following information as part of the application process:

- Name, address, email, telephone number
- CV (if applicable)

- Equal opportunities monitoring information (defined as special categories data) - this information is purely for statistical analysis and monitoring purposes
- Answers to application questions
- Any other information you wish to provide in support of your application

17.2 Why do we collect this information and who do we share it with?

We use your details and information so that we can assess your suitability for employment with us and carry out statistical analysis. Information you provide as part of your job application will be:

- Held on our computer systems and may be downloaded by us
- Used to deal with your application
- Made available to us and our processors
- Used for communication with you regarding the vacancy
- Used to satisfy legal requirements
- Used for statistical analysis
- Held and may be used to contact you about other vacancies

If you are successfully recruited, we will upload your details to our HR system, Cascade.

17.3 How can you access the information we hold about you?

If you choose to register on our recruitment website, hosted by Networx recruitment you may access your profile, correct and update your details, or withdraw your details at any time. To do this, you can access your personal profile by using the secure login.

You have the following rights in relation to the way in which we deal with your personal data:

- the right of erasure or to be forgotten
- the right to rectification if information is inaccurate or out of date
- the right of data portability (to obtain and reuse your personal data)
- the right to object to Regenda Homes processing your personal data
- the right to withdraw your consent with regards to the handling of your personal data
- you have the right to ask for a copy of the information we hold about you (Subject Access Request)
- You have the right to lodge a complaint with a supervisory authority - the ICO

Where you exercise your right to object or withdraw your consent, we may process your personal data without your knowledge or consent where we are permitted or required by law or regulatory requirements to do so. In such a case, we will not process more personal data than is required under the circumstances.

17.4 Conditional offer

If we make a conditional offer of employment, we will ask you for information so that we can carry out pre-employment checks. You must successfully complete pre-employment checks to progress to a final offer. We are required to confirm the identity of our staff, their right to work in the United Kingdom and seek assurance as to their trustworthiness, integrity and reliability.

You will therefore be required to provide:

- Proof of your eligibility to work in the UK – you will be asked to attend our office with original documents, and we will take copies.
- Proof of your qualifications, if required.
- You may be asked to complete a DBS application to declare any unspent convictions, depending on the nature of the role you apply for.
- We will contact your referees, using the details you provide in your application, directly to obtain references.
- We will also ask you to complete a questionnaire about your health. This is to establish your fitness to work and any adjustments we need to consider before you start. This is done through our current occupational health provider.
- Our Code of Conduct requires all staff to declare if they have any potential conflicts of interest. If you complete a declaration, the information will be held by our Business Assurance team.

If we make a final offer, we will also ask you for the following:

- Bank details – to process salary payments.
- Emergency contact details – so we know who to contact in case you have an emergency at work.

17.5 Health management

Corazon provides our Occupational Health service. If we make you a conditional offer, we will ask that you complete a questionnaire which will help to determine if you are fit to undertake the work that you have been offered, or advise us if any adjustments are needed to the work environment or systems so that you may work effectively.

We will send you a form to complete and return directly to Corazon. The information you provide will be held by Corazon who will provide us with a fit to work certificate or a report with recommendations. You are able to request to see the report before it is sent to us. If you decline for us to see it, then this could affect your job offer. If an occupational health assessment is required, this is likely to be carried out by Corazon.

17.6 How long is the information retained for?

If you are unsuccessful at any stage of the process, the information you have provided until that point will be retained for 6 months from the closure of the campaign.

Equal opportunities information is retained for 6 months following the closure of the campaign for unsuccessful candidates. Successful candidates' data will be stored via the Cascade system.

17.7 Fleet and mileage claims

The organisation is required to undertake statutory checks to ensure vehicles that our staff drive on behalf of the company are road worthy. To achieve this, we require staff to provide the following documents:

- Driving license details
- MOT (if applicable)
- V5 registration document (if applicable)
- Insurance details

This information is collected to ensure that any mileage payments paid to employees are done so in accordance with health and safety legislation, which requires us to ensure all travel undertaken for the business is compliant.

In addition, we carry out checks on all staff's licenses through the DVLA to ensure they are legally able to drive both their own and company vehicles. This information includes:

- Driving convictions i.e. drink driving, speeding etc.
- Number of penalty points

This information is used to ensure all drivers are legally entitled to drive. In addition, we use this data to monitor staff who have a more than 6 penalty points on their driving license.

18. Complaints or queries

Redwing tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of Redwing's collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below.

If you want to make a complaint about the way we have processed your personal information, you can contact us at dataprotection@regenda.org.uk

19. Changes to this privacy notice

We keep our privacy notice under regular review. This privacy notice was last updated on 8 June 2020.

20. How to contact us

If you want to request information about our privacy policy you can [email us](#) or write to:

dataprotection@regenda.org.uk

Data Protection
The Regenda Group
The Foundry
42 Henry Street
Liverpool
L1 5AY

Telephone: 0151 703 3000