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1. Introduction

GreenSquare Group is committed to protecting and respecting your privacy. We think it is extremely important to keep any personal information we have about our customers secure and confidential.

This Privacy Statement explains how we collect and process personal information. It tells you:

- what information we may collect about you
- how we store your personal information
- what we use your personal information for and
- who (if anyone) we pass it on to and how they use it

This includes the personal information we already hold about you now and additional personal information we might collect about you, either from you or from a third party. How we use your personal information will depend on the products and services we provide to you.

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We have a Data Protection Officer who makes sure that we respect your rights and follow the law. If you have any questions, please contact our Data Protection Officer:

Email: data.protection@greensquaregroup.com
Call: 01249 465465
By post: GreenSquare Group, Methuen Park, Chippenham, Wiltshire, SN14 0GU

The Privacy Statement may change from time to time, so we suggest you check it before you request a new service or meet with GreenSquare, to make sure you are kept up to date. If we make any significant changes affecting how we use your personal information, we will make changes to this Privacy Statement, and we will contact you to inform you of these changes.

Our mission is: 'Passionate about great places to live'

2. Who we are

GreenSquare Group is the Data Controller. Our head office is located at Methuen Park, Chippenham, Wiltshire, SN14 0GU.

We own around 12,000 properties in Wiltshire, Gloucestershire and Oxfordshire and employ around 600 staff.

We are a Registered Social Landlord (RSL) regulated by the Homes and Communities Agency (HCA). Normal activities can be summarised as:

- providing social and other types of housing
- property and grounds maintenance and repair
- managing your housing, tenancy/lease and account as your landlord

We also provide additional optional services including:

- organising and assisting community events
- providing welfare, benefits and debt advice
- adaptations made to the properties we manage.
- selling properties

Where we refer to 'we' or 'us' in this Privacy Statement, we are referring to GreenSquare Group (GreenSquare). GreenSquare Group are a 'Group' of companies. In this Privacy Statement, when we refer to 'Group', we mean other members of our 'Group' of companies, including holding and subsidiary companies.

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GreenSquare Group companies – ICO Registrations

GreenSquare Group Company	ICO Reference
GreenSquare Group Limited (Parent)	ZA225832
GreenSquare Community Housing	ZA094918
GreenSquare Construction Limited	Z3140835
GreenSquare Estates Limited	ZA094904
GreenSquare Homes Limited	Z8805001
GS Energy Services Limited	ZA062570
Westlea Housing Association Limited	Z6710635

3. What is personal information?

Personal information is information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

We do not consider personal information to include information that has been anonymised or aggregated so that it can no longer be used to identify a specific natural person, whether in combination with other information or otherwise.

We collect personal information from you when you use our services.

4. Why do we collect and store your personal information?

We need to collect and process personal information for us to provide you with our services, such as related to your tenancy, lease or support.

The word ‘process’ covers most things that can be done with personal information, including collection, storage, use and destruction of that data.

We also process personal information to pursue our legitimate interests. This means helping us to do our job as a housing provider, for example making sure our properties are let to appropriate people or reducing the risk of damage to our properties.

If you do not provide the information we need then we may not be able to provide all our services to you, and ultimately you may not be able to hold a tenancy or lease with us or sell or purchase a property through us.

We are committed to collecting and using your data fairly and in accordance with the requirements of the General Data Protection Regulation (GDPR).

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5. How we collect your information

GreenSquare obtains information from you by various means, such as face-to-face, by email, telephone, correspondence or when you respond to a survey.

We may receive information about you from third parties including:

- your family, friends or neighbours
- your council or benefits office relating to your housing
- prior landlords and credit agencies when you apply for housing
- police, welfare or support organisations dealing with you
- councillors, MPs or other representatives acting on your behalf/instruction
- financial institutions when you apply for our services
- public information sources including credit reference agencies or the Criminal Records Bureau

We operate CCTV systems at our office premises for the detection and prevention of crime. It operates continuously, and recordings are held for one month.

From time to time we may operate CCTV / sound recording and / or use photography to capture evidence of breach of tenancy, alleged anti-social behaviour or crime.

We may also 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.

6. Why do we record telephone calls?

When you speak to someone at GreenSquare on the telephone we may record the conversation. We record calls for training and monitoring purposes to help us do our job well and to provide excellent customer service. This may include:

- verifying information that you have given to us
- reviewing calls to respond to complaints, and
- protecting our staff from verbal abuse.

Whenever you telephone us we will tell you that we are recording the call. Call recordings are kept for six months and then securely destroyed.

7. What information do we collect?

When you apply to become a GreenSquare customer, we request and hold on file any information necessary to assess your application including: (as appropriate but not limited to) references from other housing providers/private landlords, your mortgage lender (if you own/have owned your own home), the police, the probation service, support workers, social workers, mental health workers and credit reference agencies.

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If you provide us with personal information relating to members of your family or your associates we will assume that you do so with their knowledge and their consent to the collection and processing of the information.

It is important that you notify us of any changes to your personal information.

8. How we use your personal information

We collect, process, share and securely store personal information in compliance with the GDPR. We collect and process personal information to allow us to allocate and manage homes and to improve services.

We will do our best to keep your data accurate and up to date, and not keep it for longer than is necessary. We are required by law to keep some data, for example information needed for income tax and audit purposes. Some other types of personal information may need to be kept for longer periods depending on the reasons we have collected it. You can ask us about how long we need to keep your data and why we need it when we collect it from you.

9. What we will not do with your personal information

We will not send you unsolicited marketing material. We will not sell your personal information on to third parties.

Unless you pay our bills using direct debit we will not usually retain your payment details.

We will not pass on your personal information to unrelated third parties unless we are allowed or required to do so by law or we have your explicit permission to do that.

We will not share your personal information with anyone who claims to represent you unless we are satisfied that you have appointed them, or they act in some recognised official capacity. There may be a delay to us dealing with requests whilst we confirm the caller's identity or check that we have your approval to deal with them.

We will not transfer or store your personal information outside of Europe (the European Economic Area) outside of the control of the UK / European regulations.

10. Our legal basis for using your personal information

We only use your personal information where that is permitted by the laws that protect your privacy rights. This will be where:

- we need to use the information to comply with our legal obligations;
- we need to use the information to perform a contract with you; and/or
- it is fair to use the personal information either in our interests or someone else's interests, where there is no disadvantage to you – this can include where it is in

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- our interests to contact you about products or services, market to you, or collaborate with others to improve our services;
- where we need to seek your consent (if consent is needed).

Where we have your consent, you have the right to withdraw it. We will let you know how to do that at the time we gather your consent.

Special protection is given to certain kinds of personal information that is particularly sensitive. This is information about your health status, racial or ethnic origin, political views, religious or similar beliefs, sex life or sexual orientation, genetic or biometric identifiers, trade union membership or criminal convictions or allegations. We will only use this kind of personal information where:

- we have a legal obligation to do so (for example to protect vulnerable people);
- it is necessary for us to do so to protect your vital interests (for example if you have a severe and immediate medical need whilst on our premises);
- it is in the substantial public interest;
- it is necessary for the prevention or detection of crime;
- it is necessary for insurance purposes; or
- you have specifically given us ‘affirmative’ consent to use the information.

11. How we might share your personal information

We may share personal information within our organisations that are within the GreenSquare group of companies and with others outside GreenSquare where we need to do that to make products and services available to you, market products and services to you, meet or enforce a legal obligation or where it is fair and reasonable for us to do so.

Who we share your personal information with depends on the products and services we provide to you and the purposes for which we use your personal information. For most products and services we will share your personal information with our own service providers such as our IT Suppliers, with credit reference agencies and fraud prevention agencies.

Most of the time the personal information we have about you is information you have given to us or gathered by us while providing products and services to you. We also sometimes gather personal information from and send personal information to third parties where necessary for credit checking and fraud prevention or marketing purposes, for example so you can receive the best offers from us and our partners.

12. How long we keep your personal information

How long we keep your personal information for depends on the services we deliver to you. We will never retain your personal information for any longer than is necessary for the purposes for which we need to use it.

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13. How do we protect your personal information?

We are committed to holding your personal information securely. This means only those of our colleagues and contractors that need to see it have access.

If we can store your personal information solely on computers we will, however there will be cases where we have paper copies instead, or as well. Our computer system is at our offices but we do use computers (including laptops and tablets) outside our offices if they are secure and under our control. Sometimes we also use computers which are owned or managed by our suppliers, if the computers are secure and under our control.

We maintain commercially reasonable security measures to protect personal information against unauthorised access and disclosure and that are consistent with our business operations and generally accepted industry standards.

14. Your privacy rights

You have eight rights relating to the use and storage of your personal information. These are:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling

Further information about your privacy rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

In brief, you have the right to be informed who is obtaining and using your personal information, how this information will be retained, shared and secured and what lawful grounds will be used to obtain and use your personal information. You have the right to object to how we use your personal information in certain circumstances. You also have the right to obtain a copy of the personal information we hold about you.

In addition, you can ask GreenSquare to correct inaccuracies, delete or restrict personal information or to ask for some of your personal information to be provided to someone else. You can make a complaint if you feel GreenSquare is using your personal information unlawfully and/or holding inaccurate, inadequate or irrelevant personal information which if used may have a detrimental impact on you and/or has an impact on your rights.

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15. Accessing the information we have about you

You have a legal right to access information that we hold about you. You can ask any of our Customer Support Officers in OUR Contact Centre or write to our Data Protection Officer at our registered office address.

We will acknowledge your request within 10 working days and normally give a full response within 30 days. In most cases we will be able to comply with your request, however we may not be able to fulfil your request if your personal information contains details about another person.

You can find more information and a Subject Access Request form on our website. You do not have to use this form but it may help us to process your request more efficiently if you do.

16. Keeping you up to date

We will communicate with you about products and services we are delivering using any contact details you have given us, for example by post, email, text message, social media and notifications on our app or website.

Where you have given us consent to receive marketing, you can withdraw consent, and update your marketing preferences by contacting us directly. For contact details, visit the [Contact Us page on our website](#).