

GreenSquare Group – Privacy Statement for our Customers



Purpose of this Statement

GreenSquare Group (“**GreenSquare**”) 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.

Laws apply to GreenSquare’s use of anyone’s personal information and everyone has rights regarding how their personal information is handled.

We have published this Statement to tell 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

Information we may collect from you

We may collect the following personal information about you:

When you first come to see us

- Your name and contact details for use across GreenSquare and by our suppliers and partners
- Detailed personal information (including sensitive personal information) such as age, sex, date of birth, ethnicity, particular needs or preferences so that we can understand our customers and their needs better

For housing management purposes

- Your housing needs, so we can ensure your nominated property suits you
- Bank details and direct debit information to make payments such as rent or service charges (we only exchange details with the account holder and the third party who manages our Direct Debits)
 - NB If you pay us using your payment card we do not store the details, for your added security (and we only exchange the details with the person we believe to be the card holder or permitted third parties)
- Benefit and council tax information to verify your circumstances
- Details relating to the repair and maintenance of your home
- Information that you provide through the Contact Centre
- Information that you provide to other members of staff of GreenSquare Group companies
- Feedback from our contractors, about their appointments with you
- Voice and video recordings for safety, crime reduction and quality management

To enhance your experience with GreenSquare

- You can give us details of your friends, relatives or neighbours who you trust to contact us on your behalf e.g. to arrange one of our services for you

- You can give us details of anyone whom you have given a Power of Attorney to to contact us on your behalf
- Your name and contact details for customer satisfaction surveys, newsletters and service information
- With your consent, your name, photo, video or story for brochures, advertising or press releases or use by the media
- Any information about complaints about our service or other individuals, or accidents or incidents involving you or your home
- Your comments about services from us or our suppliers

If you ask for additional GreenSquare services:

- If you ask us for care and support requirements we will hold detailed information about your needs and your families needs
- We will hold records of payments for the services
- If you contact us about money problems we will hold detailed information about your income and debts; we keep this separate from our other information about you
- If you use any of our training and/or employment projects we will ask about your employment and learning history
- If you access any of our other involvement and support projects we will ask you for personal information relevant to those projects

In addition

- We may hold information about your history e.g. regarding credit, or offences, if we need it to look after our colleagues, business or anyone else
- If you make a complaint we will keep the details separate from our other information about you

Where we provide a bureau service

- We will receive information from your service provider and we will exchange the information we need in order to provide a service to you on their behalf
- We may receive management information about the accounts we manage

We may get the information, or related information, from your or our partner organisations (see below), your family, friends or neighbours, our colleagues or public information sources including credit reference agencies or the Criminal Records Bureau.

We may also record factual information whenever you contact us or use our services and of other action we take, so we have a record of what happened.

Where we store 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.

What we use your personal information for

- As above and generally for providing our services for you
- Data sharing between organisations that are within the GreenSquare group of companies, which include, but are not limited to: GreenSquare Group Limited, GreenSquare Community Housing, Westlea Housing Association Limited, GreenSquare Homes Limited, GreenSquare Construction Limited, GS Energy Services Limited and GreenSquare Estates
- Keeping in touch with our customers, understanding your needs and preferences, inviting you to events and offering and booking appointments with you
- Telling you about changes to GreenSquare and its services
- Meeting your housing management needs and requirements including (but not limited to) repairs, maintenance, relocation, exchange or purchase and routine inspection
- Managing payments from you to your or on your account and for accounting purposes
- Providing additional services, where available, at your request including skills training, adaptations and every day support services
- Prevention, detection and prosecution of crime
- Quality management
- Informing our staff, contractors or others (as appropriate) about past incidents e.g. anti-social behaviour, for their protection, in line with our policies
- Meeting our legal obligations including our funders or regulators
- Us or your other suppliers exercising legal rights, including under contract with you
- Other purposes. We may anonymise your information so that it cannot be linked to you. In that case we may use the data for any purpose

Who else we may pass on your information to

Normally, only GreenSquare will be able to access your personal information. However there may be times when we disclose your details to others, as follows:

- Organisations that are within the GreenSquare group of companies, which include, but are not limited to: GreenSquare Group Limited, GreenSquare Community Housing, Westlea Housing Association Limited, GreenSquare Homes Limited, GreenSquare Construction Limited, GS Energy Services Limited and GreenSquare Estates
- Our suppliers who enable us to provide our services to you, or who provide services on our behalf
 - Housing contractors e.g. to undertake repairs or improvements to your home
 - IT providers who own or manage the computers, phones or systems we use
 - Our contractors who handle your out of hours service calls for us
 - Banks e.g. to carry out payments through a secure system
 - Companies that assist us in mailing out our letters, leaflets and newsletters
 - Additional staff resources, such as consultants or agency staff
 - Our professional advisors and providers of financial services

- Our partner organisations whose purposes dovetail with ours
 - Training providers or learning institutions
 - Other housing associations
 - External assistance where you have agreed to the referral, for example to do with money problems or domestic abuse
 - Local authorities and Government departments who provide relevant services for you, including benefits
 - Credit reference agencies; to help assess your applications, manage your tenancy, verify your identity and undertake checks to prevent or detect crime
 - The police, fire services, health authorities or medical staff who provide services for you
- Others who may request information from us for their own purposes
 - Utility companies
 - Debt collection agencies acting for others
 - For crime prevention or detection, risk assessment, resolution of complaints or other issues
 - Local authorities, Safeguarding Boards, regulators, Government departments and other public authorities, such as for preventing payment errors or fraud
 - The police, fire service, health authorities or medical practitioners

We may sometimes be obliged to disclose your personal data by law such as by a regulator with appropriate power (e.g. the Homes and Community Agency) or court order. Information held by public bodies can be subject to freedom of information legislation.

We do not give anyone else access to your information, in return for payment, for their marketing or commercial purposes.

Unless you pay our bills using direct debit we will not usually retain your payment details. Whoever pays your bills will have to give us the payment card details each time they make a payment.

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.

Social media

We may get your information from social media, whether on our own sites or elsewhere. Where you use our own website or social media you grant us an irrevocable, royalty-free, non-exclusive licence and give us your consent, to copy, use and reproduce any of your contributions for any purpose.

Where you make a contribution to **any** social media (whether on our own site or elsewhere) we may use that information for any of the purposes stated in this Privacy Statement.

Where a contribution to **any** social media (whether on our own site or elsewhere) constitutes a breach of GreenSquare policy, terms and conditions or laws that apply, we may take the following actions:

- Issue of a warning to you.
- Start legal proceedings against you for reimbursement of all costs on an indemnity basis (including, but not limited to, reasonable administrative and legal costs) resulting from the breach.

- Take further legal action against you (including, but not limited to, proceedings for a breach of your contract of employment or other contract you may have with us).
- Report you and disclose such information to law enforcement authorities in any jurisdiction as we reasonably feel is necessary.
- Report you and disclose such information to any local government or statutory body in the United Kingdom as we reasonably feel is necessary.
- Report you and disclose such information as we reasonably feel is necessary to the site administrator and/or take action against you through the site administrator's procedures to enforce the policies and terms and conditions that apply between you and the site administrator and/or between you and us.
- Publish such information about you as we reasonably feel is appropriate, publicly (which may include social media).

We exclude liability for actions taken in response to breaches of any GreenSquare policy. The responses described in this Privacy Statement are not limited and we may take any other action we reasonably deem appropriate and we are not obliged to take any action.

Where you make a contribution to our social media, we may also take the following actions in addition to any other actions described above:

- Immediate, temporary or permanent withdrawal of your right to use our Facebook pages.
- Immediate, temporary or permanent removal or editing of any posting or material uploaded by you to our social media.

Your rights

You have the right to ask us not to process your personal information; however we may be unable to provide our services to you if we are unable to record and process certain details.

Accessing the information we have about you

You have a legal right to access information that we hold about you. If you ask us, we will charge a fee of £10 to meet our costs. You can ask any of our Customer Support Officers in the Contact Centres or write to our Information Management Officer at our registered office address.

We will acknowledge your request within 10 working days and normally give a full response within 40 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.

Changes to our Privacy Statement

This Statement may change. We will display the new Statement in all places where it can usually be found, such as on our website and at our offices and outlets.