

## **PRIVACY INFORMATION FOR USERS OF ONLINE SERVICES INCLUDING CUSTOMER SURVEYS**

CHS is committed to protecting your personal data. This privacy notice sets out how your personal data will be collected and processed in relation to use of the CHS website, myCHS, Live Chat and customer surveys. Please note that this privacy notice will be regularly reviewed and may be updated from time to time.

### **What information do we collect?**

We may ask you for information including:

- Contact details for you and your household (we will assume you have consent if you submit details for anyone else in your household)
- Information about you and your household (this might include your age, sex, ethnicity, health, any money issues)
- Your views on how well or not you feel we are providing our services, and what we could do to improve

You may also provide us with any other information you think we need to know.

We collect this information through:

- Forms you complete/submit on the website/myCHS
- Details you write on Live Chat to our Customer Service Advisors
- Survey Responses you complete online (or by phone or on paper)

We store the data obtained on our Housing System (QL) and other internal systems, all of which have strict access controls. Information and forms you send by email may be forwarded to the relevant department(s). If you complete a survey administered for us by an external survey company, they abide by all relevant data protection legislation and never sell or share your data with any third parties, only us.

When someone visits [www.chsgroup.org.uk](http://www.chsgroup.org.uk) we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour 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 any attempt to find out the identities of those visiting our website.

You can read more about how we use cookies on our website in our [Cookie Policy](#).

## **Why do we process personal data?**

We collect this information to help us deliver effective services and to improve the service we offer to you. We will use it to help us keep up to date with your details. We are required by our Regulator (Regulator of Social Housing) to ask our customers how satisfied or not you are with your home and with our service. We will also use it to answer your queries, give other feedback, and provide you with relevant news and information.

We rely on different legal bases for processing this information, including:

- our legitimate interests (such as improving services, providing relevant support and community services, understanding more about who our customers are)
- compliance with legal obligations (for example, to our Regulator)
- your consent, or where you make the information public

Where we process special category data (such as health information), we do so only where it is necessary and proportionate to our purposes. This processing may be on the basis of substantial public interest, your consent, or for health and social care reasons.

NB: participation in any customer survey we invite you to complete is voluntary, and you do not have to answer any question you prefer not to answer.

## **Who has access to the data?**

The information you supply will be kept securely and in accordance with our document retention policy. We may need to pass your details on to one of our contractors or partner organisations, which provide services on our behalf (such as property maintenance or courier services, or external survey companies). These third parties are also required to keep your personal information in accordance with Data Protection legislation. We will not pass on your personal details for commercial purposes.

We reserve the right to access and disclose individually identifiable information to comply with applicable laws and lawful government requests, to operate our systems properly or to protect ourselves and our users. We also reserve the right to disclose individually identifiable information to third parties where a complaint arises concerning your use of the website, and that use is deemed by us inconsistent with this privacy notice and/or any additional terms.

If you apply for a job at CHS by either completing an application or submitting a CV via e-mail then you will be providing personal data, which will only be used for assessing your suitability for the job you have applied for and any subsequent interview process.

This privacy notice does not cover the links within this site to other websites. We encourage you to read the privacy statements on the other websites you visit.

## **How do we protect your data?**

We take data security very seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties. Your data may be held securely in electronic and/or manual records. All of our staff receive data protection training and are made aware of how data should be handled and stored in accordance with data protection legislation. Where appropriate, IT systems have restricted access arrangements in place to ensure that only authorised staff have access to your data.

### **For how long do we keep your data?**

We will keep your personal data within our secure systems as a current or former tenant in accordance with our retention guidelines. We keep your survey responses within the external survey and Housing Contact systems for no more than three years.

### **What are your rights?**

Even if we already hold your personal data, you still have various rights under Data Protection legislation. We will seek to deal with your request without undue delay and in accordance with any legislative requirements. We may keep a record of your communication to help us resolve any issues or requests that you raise.

- Right to object – if we are using data because we deem it necessary for our legitimate reasons to do so and you do not agree, you have the right to object. You also have the right to object to being subject to automated decision making, including profiling and direct marketing.
- Right to withdraw consent – where we have obtained your consent to process personal data for certain activities (including marketing), you may withdraw your

consent and request that your personal data be deleted at any time.

- Right to access (subject access request) – you have the right to ask us to confirm what information we hold about you at any time and may ask us to modify or update such information. We may ask you to verify your identity, provide more information and/or where legally permitted decline your request and explain why.
- Right to erasure – in the following circumstances, you have the right to request that your personal data be erased: if the data is no longer necessary for the original purposes it was collected or processed, it has been processed unlawfully, it should be deleted due to a legal obligation or you object to processing and there is no overriding legitimate interest for us to continue processing. We may only decline your request if certain limited conditions apply.
- Right to portability – you have the right to ask us to transfer your data to another data controller.
- Right to block or restrict processing whilst the organisation considers your requests exercised under data protection legislation.

If you would like to exercise any of these rights, please e-mail [data.protection@chsgroup.org.uk](mailto:data.protection@chsgroup.org.uk) or write to the Data Protection Officer, Endurance House, Vision Park, Chivers Way, Histon, Cambridgeshire, CB24 9ZR.

If you remain dissatisfied then you have the right to complain directly to the Information Commissioner (<https://ico.org.uk/make-a-complaint/>)

### **Automated decision-making**

Use of our online services (website, myCHS, Live Chat) or the completion of satisfaction surveys do not involve automated decision-making functions.

### **Contact details of the Data Protection Officer**

CHS Group has a Data Protection Officer who can be contacted by e-mailing [data.protection@chsgroup.org.uk](mailto:data.protection@chsgroup.org.uk) or writing to our offices at Endurance House (at the address given above).