

Privacy Notice

Our privacy policy sets out what to expect when LiveWest collects personal information and how we use and protect any information that you give us when you use this website. We are committed to ensuring that your privacy is protected. If we ask you to provide information which can identify you when using this website, then we will only use it in accordance with this privacy statement.

We will hold information about you such as the names of household members and maybe health or special needs. The law on data protection gives you rights in relation to information we hold about you and requires us to use it fairly and properly in ways you understand.

This guide includes:

- Why we hold and process data
- What we do with personal data
- Who gets to see personal data, and
- How you can find out what information we hold on you

In this guide we use terms that have special meanings under the law on data protection. We have not set these out in detail but, in summary, the main terms are:

Personal data: Sensitive personal data: This includes personal information relating to an identifiable individual; personal data can be held on computer or in organised filing systems.

data relating to what may be sensitive matters such as physical or mental health, racial or ethnic origin, religious beliefs, sexuality, criminal offences or allegation of such offences.

Processing: This is a very wide term including obtaining, holding, disclosing, updating or deleting information.

Why do we hold and process your personal data?

We may process your personal data for a number of reasons, including:

- Housing management, including letting and selling homes (this includes advising utility companies of names and addresses, including forwarding addresses of those responsible for paying gas, electricity and water supplies)
- Rent collection, including housing benefits and collection of service charges;
- Debt recovery (this includes rent and repair recharges not paid by current or former tenants)
- Repair and maintenance of homes and other facilities
- Meeting the health and support needs of tenants
- Regulatory purposes such as meeting housing regulatory requirements
- Research
- Prevention of crime and crime reduction, and
- Equal opportunities monitoring

These are the main purposes for which we process data. Sensitive personal data are normally only held if you or someone authorised by you (e.g. a doctor or social worker or someone living with you) has given us the data. We will use all information held by us in order to undertake those functions efficiently and effectively.

livewest.co.uk

LiveWest has notified the Information Commissioner in detail of the purposes for which it uses the data and what it does with the data. Further details are available from the office of the Information Commissioner:

Helpline: 0303 123 1113 (local rate)
Email: casework@ico.org.uk
Website: www.ico.org.uk

Head Office address:
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF

What do we do with personal data?

LiveWest is known as a data controller. What we do with data depends on particular circumstances and the needs of particular residents and those living with them. We can only use it for purposes we have set out in advance. We have to comply with principles designed to protect the individuals on whom we hold data.

The principles include the requirement that data:

- Must be processed fairly and lawfully and only for specified purposes
- Must be accurate, relevant and not excessive
- Must be kept no longer than necessary, and
- Must be protected against accidental loss and unauthorised use or other processing

We will use the information collected to understand your needs and provide you with a better service.

We may also use your information to contact you for research purposes, if you have advised that you are happy for us to do so. We may contact you by email, phone, fax or mail, depending on the preference you have given. The data processor used when carrying out this research is located in the EU and is governed by GDPR.

Visitors to our website:

This site uses Google Analytics to allow us to track how popular our site is and to record visitor trends over time. Google Analytics uses a cookie to help track which pages are accessed. The cookie contains no personally-identifiable information, but it does use your computer's IP address to determine where in the world you are accessing the site from, and to track your page visits within the site. 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.

For information on our cookie use please see our cookies guidance note.

From time to time, we may embed external content from third-party websites, for example Twitter or YouTube, within our website. These external websites may utilise cookies and the privacy policy that

will apply to such third-party content will be that published on the website of that third-party content provider.

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

People who call our offices:

When you call any of our LiveWest offices, we collect Calling Line Identification (CLI) information. We use this information to help improve its efficiency and effectiveness.

If a call is made to our Customer Call Centres then the call may be recorded in order to improve the quality of the service provided to LiveWest's customers and to support staff in carrying out their role. They will also be used to support the investigation of complaints.

When used for staff training purposes in a public arena, recordings will not include any personal details that identify callers unless those involved on the recording have given consent. Monitoring of call recordings will only be undertaken by authorised personnel, for example a senior manager, who has a business need to monitor the recordings. Any playback of recordings will take place in a private setting.

The recordings will be stored securely within the call recording software for 90 days. However, some recordings may be saved where calls have been abusive or otherwise problematic, or where complaints have or are expected to result. These calls will be saved for only as long as there is a business need and can only be accessed by a senior manager.

CCTV Cameras:

CCTV Cameras are used in a variety of locations. Handling of these cameras is covered by the ICO's CCTV Code of Practice and The Surveillance Camera Code of Practice.

Photographs on publications and our website:

Occasionally we may place pictures of our properties and tenants on our website. However, we would only identify you specifically in pictures with your permission. Group photos at company events may also be taken and placed in our newsletters or on our website. If you do not want your photo to appear in group photos then please advise the person taking the photographs, or contact our office to ask for the photo to be removed from display.

Document retention and disposal:

Under the GDPR (EU Regulation 2016/679), it is a requirement that we do not keep data longer than is necessary. Therefore, we will use our document retention and disposal procedures to ascertain when the personal and sensitive personal data is no longer required. All such paper data will be shredded in-house at our offices or by a mobile shredding company. All electronic personal and sensitive personal data, when no longer required, will be deleted and when computers are obsolete the hard-drives will be wiped by a professional recycling company and a certificate issued to prove this has happened.

Queries:

LiveWest tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we received 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 an exhaustive detail of all aspects of LiveWest'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 at the bottom of this notice.

What we do with personal data?

Generally only LiveWest staff see personal data on a business need to know basis. This can include staff of other companies in the LiveWest Group; all Group companies are registered with the Information Commissioner. But there are circumstances where we disclose data to others, including our contractors and agents such as our legal advisers; to other social landlords, to local authorities; and to government departments and to the police. We would not disclose data for purposes other than those mentioned above. When we do disclose data, we do our best to ensure it is kept secure and used properly.

The lawful basis we rely on when we use your sensitive personal information

In general, we will not process particularly sensitive personal information about you unless it is in the substantial public interest for us to do so. We will use information about your physical or mental health, or disability status, to ensure your health and safety and to safeguard your wellbeing or where you are incapable of giving consent (for example if you are very unwell).

As with ordinary personal data, sensitive data is normally seen only by LiveWest staff on a need to know basis. Generally, this is done with your knowledge, for example, where we are confirming information with a doctor or social worker or giving it to another social landlord in relation to a request by you or those living with you to move home. We do not routinely request your consent to process your sensitive personal information or information about criminal convictions and we do not require your consent when we process that information. We may also disclose sensitive personal data where processing such data is permitted by data protection legislation without obtaining consent.

We have an appropriate policy document in place which explains how we process sensitive personal information and information about criminal convictions

Information about criminal convictions

We may hold information about criminal convictions. We will only collect information about criminal convictions if it is appropriate given the nature of the service we provide and where we are legally able to do so. We may receive information about criminal convictions where that is relevant to a service we provide. We will use information about criminal convictions and offences where it is in the substantial public interest for us to do so or in bringing or defending legal claims.

Disclosures of your personal data

We may share your personal data with third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Access to personal information

LiveWest tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information about them by making a 'subject access request' under the GDPR (EU Regulation 2016/679). If we do hold information about you we will:

- Tell you who it has been disclosed to; and
- Let you have a copy of the information in an intelligible form

To make a request to LiveWest for any personal information we may hold, you need to put the request in writing, either by letter, email or fax, to the address at the bottom of this notice. You will also be asked to prove your identity before any information is sent to you.

If we do hold information about you, you can ask us to correct any mistakes by, once again, contacting LiveWest at the address at the bottom of this notice.

Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect.

How to contact us:

If you would like to know more about this Privacy Notice, including about how we look after your information, please contact the Data Protection Team on [**data.protection@livewest.co.uk**](mailto:data.protection@livewest.co.uk) or via 1 Wellington Way, Skypark, Clyst Honiton, Exeter, EX5 2FZ or telephone 0300 123 8080.