

LiveWest Privacy Notice

Updated: 25 April 2025

We are committed to keeping your personal information safe. Our privacy notices explain how we collect, use, and protect your data.

What we do with your data

- We collect different types of information depending on your relationship with us.
- We use, store, and keep your data for a certain amount of time.
- We have extra privacy notices for specific services, which give more details. These are available on our Website <https://www.livewest.co.uk/privacy-notice> and include:
 - Renting a home from us
 - Shared ownership homes
 - Buying or looking to buy a home
 - Living in a property with a LiveWest leasehold
 - Renting a garage from us
 - Supported, sheltered, or extra care accommodation from us
 - Tenancy sustainment services
 - Community events and Connectors
 - Customer research and engagement
 - Under 18s and children
 - Your rights

Keeping up to date

- Our privacy information might change due to new laws or changes in our services
- Please check our privacy information regularly to stay updated

This page was last updated on 25 April 2025. We aim to make our privacy information clear and easy to understand. If you have any feedback, please let us know.

Overseas transfers and LiveWest's data protection responsibilities

Most of our data processing happens in the UK. Sometimes, we use 'cloud' systems that might be based in other countries. When this happens, we make sure the data transfers follow data protection laws. We might also use IT systems from other countries.

Data protection laws require us to:

- Use your personal data fairly, legally, and clearly
- Only use your personal data for the reason it was collected
- Collect, use, and store only the minimum amount of data needed
- Make sure the data we collect and hold is accurate
- Keep data according to LiveWest's rules and legal requirements
- Have security measures to protect the data we hold

Why do we collect your personal data?

We collect, process, and store your personal data to provide an efficient and effective service to our customers, communities, and members of the public. We also have obligations to provide certain information to our regulators such as the Regulator for Social Housing and the Housing Ombudsman Service through membership of the scheme.

What types of information do we hold?

We keep different kinds of information about you, depending on our relationship. Here are some examples:

- Basic personal information like your name, address, and date of birth.
- Your contact details.
- Information about equality and diversity, such as your ethnic origin, sexual orientation, health, and disability.
- Information to help us provide services to you, like support needs or health conditions.
- Contact details for support services or people working with you.
- Information about your rent account.
- Recordings of some phone calls.
- Photos or images from CCTV cameras.
- Feedback you give us through customer research.
- Records of your contacts with us.

Lawful Basis for using your personal data

We need a legal reason to use your personal data. There are five legal reasons we rely on:

- Contractual Necessity
- Legitimate Interest
- Vital Interest
- Legal Obligation
- Consent

Public task or personal interest

There is another legal reason for using personal data called "public task" or "public interest." We are not a public authority, so we usually do not use this reason for collecting, storing, or using your personal data.

Contractual Necessity

Most of the information that we collect is used to manage a tenancy in accordance with your tenancy agreement, leasehold agreement, or other contract for example:

- Managing your rent account or payments.
- Managing the maintenance of our properties.
- Managing tenancies and licences to ensure that conditions are met, such as managing antisocial behaviour.
- Fulfilling other duties as a landlord.

Legitimate Interest

We can legally use your data if it helps us and our customers. When we do this, we think about how it affects your privacy and other interests. We use this reason when it benefits us unless it would harm our customers' interests. Our reasons for using your data might include:

- Preventing or detecting crime.
- Doing research to improve our services and understand our customers' needs.
- Informing utility companies and council tax departments about who lives in our properties, when they move in or out, and meter readings for accurate billing. This might include sending documents if needed.
- Checking for fraud prevention.

Vital Interests

In an emergency and in the interests of health, wellbeing, and safety, we may share your personal data. For example, we may share your information with the emergency services.

Legal Obligation

We may use your data if we are required to do so by law. For example, we may be required to provide evidence or information to the courts, the Regulator of Social Housing, and through membership of the Housing Ombudsman Scheme. We may also process your data to meet our obligations set out by our regulators, and under UK housing law.

Consent

Sometimes we need your permission to use certain types of personal information, especially special category data*. If we ask for your consent, you can choose not to give the information, refuse to let us use it, or say "prefer not to say." We might also ask for your permission to use your data for publicity or promotional materials, like photos of you, taken at a LiveWest event.

* Please see the special category data section of the privacy notice below.

Where do we get your information, and when do we collect your personal data?

We may collect your personal data in different ways:

- When you rent or buy a home from us, either directly from you or from other agencies, like choice-based lettings or Government programmes.
- When you or a household member contacts us.
- When you visit our schemes and offices.
- When we manage your housing, including your rent account.
- From third-party organisations working for you.
- From your feedback during customer research.
- From you through our Customer Portal.

Our main sources of personal data are:

- You and other people in your home
- Your neighbours
- Our colleagues and systems
- Other agencies we work with, like local authorities involved in housing or benefits

How do we use your personal data?

- Managing housing, like renting and selling homes, and dealing with antisocial behaviour
- Collecting rent, housing benefits, and service charges
- Making sure utility companies and council tax departments bill you correctly
- Recovering debts, including unpaid rent and repair costs
- Repairing and maintaining homes and other facilities
- Meeting your health and support needs
- Following housing regulations
- Doing research to understand our customers better
- Preventing and detecting crime and fraud
- Monitoring equal opportunities

This is not a complete list. We may use your personal data in other legal ways.

Who gets to see your personal data?

In general, only LiveWest staff see your personal data on a 'business need to know' basis. This can include staff from other companies in the LiveWest group; all group companies are registered with the Information Commissioner. But there are circumstances where we may share personal data with others, including:

- Our contractors.
- Agents such as our legal advisers.
- Agents contracted to carry out services on our behalf, including customer research.
- To other social and private landlords.
- To local authorities, such as the Council Tax and benefits departments.
- Government departments. This could include the Housing Ombudsman through membership of the scheme, the Regulator of Social Housing when required to do so by law, the Health & Safety Executive, and the Information Commissioners Office.
- To the police.
- To Local authorities and utility companies as part of the moving in and moving out process. This could include names of those responsible for paying the bills, tenancy start and end dates and forwarding address. This could also include sharing copies of some documentation if necessary.

This is not a complete list. We may use your personal data in other legal ways.

Where we regularly share data with a third party organisation, we have data sharing agreements and protocols in place.

We also share information with contractors who provide services on our behalf. We expect them to respect the security of your data in accordance with data protection law. We do not allow these contractors to use your personal data for their own purposes, and only permit them to use your data for a specific purpose in accordance with our instructions.

Our lawful basis for sharing your personal data

Sometimes we may share your relevant personal data with third parties for the reasons above, or if we have to by law. For more details on when we might share your personal data, please check the additional privacy notice that applies to you.

When sharing personal data, we will comply with data protection law and will have a lawful basis to do so. The lawful basis for sharing data is:

- We have a contractual obligation
- We have a legal obligation
- We have a legitimate interest
- It is in the legitimate interests of our customers or staff
- We need to protect an individual's vital interests
- It is in the public interest.

If none of the above apply, then we will seek your consent before we share your data.

When sharing special category data (see below), we will ensure that it also meets one or more of the additional conditions for processing this type of data under data protection law.

Where we regularly share data with a third party organisation, we have data sharing agreements and protocols in place.

We also share information with contractors who provide services on our behalf. We expect them to respect the security of your data in accordance with data protection law. We do not allow these contractors to use your personal data for their own purposes, and only permit them to use your data for a specific purpose in accordance with our instructions.

How can you find out what personal data we hold about you?

You can ask us if we have any personal information about you by making a "subject access request" under UK GDPR. For more details on how to make a subject access request, check the Your Rights section of this privacy notice or visit the Information Commissioner's Website:

<https://ico.org.uk/for-the-public/your-data-matters-blog/>

Special category data

We may need to collect and use special category data about you. Special category data includes information about your:

- Racial or ethnic origin
- Political opinion
- Religious or philosophical beliefs
- Trade union membership
- Data concerning physical or mental health conditions
- Sex life or sexual orientation

We may share your special category data to provide you with support, or signpost you to other appropriate services, this could include sharing data to:

- Provide support due to sickness or disability
- Safeguard and protect vulnerable people.
- Provide support with finances or benefits.
- Help with employment or training.
- Support families and children's needs.
- To promote social inclusion.

In addition to this we may, on occasion share special category data with statutory agencies, such as:

- The police.
- Local authorities.
- Health care, such as GP's or mental health services.
- Government departments. This could include the Housing Ombudsman through membership of the scheme, the Health & Safety Executive, and the Information Commissioners Office, when required to do so by law.
- As a housing provider, we also have a legal obligation to provide special category data to monitor equal opportunities for statistical purposes. However, this does not relate to an individual person.

Special category data is only seen by LiveWest staff who need to know it. We usually do not collect or use this sensitive data unless it is necessary for housing, legal reasons, or important public interest. We might use this data to keep you safe and healthy, or if you cannot give consent.

We usually let you know when we use your special category data, but we do not always ask for your permission. We can use and share this data if the law allows it, even without your consent.

Criminal conviction data

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

Photographs, publicity and promotional media

We may take and place pictures of our homes and customers in promotional materials or in communications to staff and customers. However, we would only publish photographs which specifically identify you with your permission. Group photographs and recordings may be taken at LiveWest events. Signage at the event will advise you if photography or recordings are taking place.

We may use your photograph or recordings on our website:

- The internet including social media platforms and third-party websites such as other housing associations, shares on social media, or with third-party partners that we work with.
- Printed and digital publications and promotional materials including reports, publications, display material, websites and other forms of literature and electronic media and posters.
- Other channels used to promote the work of LiveWest and with our partners.
- Press releases to external sites such as media outlets, regional and local media, and their social media accounts. This will include third -party websites such as other housing associations, shares on social media, or with any LiveWest partners.

We will on some occasions employ a third-party professional photographer to help us obtain images and recordings.

Audio recordings

We may at times use audio recordings and quotes given by our customers. If you are specifically identified, we will obtain your permission to use the recording and quotes. We may use audio recordings and quotes:

- To support the creation of promotional case studies.
- In press releases to external sites such as media outlets, regional and local media, and their social media accounts. This will include third-party websites such as other housing associations, shares on social media, or any LiveWest partners.

Consent

We may take photographs or video recordings at our community or promotional events. If photography or recording of images is taking place at the event, you will be made aware of this via appropriate signage. By participating in the event, you are giving your consent for your image to be captured.

Where we obtain consent to use your specific recording of video, audio, or quotes, we will do so in writing. We will retain your consent form for six years; however, we may continue to hold your photograph, quote or any recordings in our archive in line with our retention schedule. If we wish to use your information in publications beyond the six-year period, we will contact you to obtain fresh consent.

Withdrawing your consent

You can withdraw consent at any time by contacting our Communications by email at: communications@livewest.co.uk at this point, your data will be removed from our archive, and we will not use your data in the future.

CCTV

CCTV Cameras (and other surveillance devices like body worn cameras) are used in a variety of locations. When installing CCTV, we follow good practice as set out by the Information Commissioner's Office and the Surveillance Camera Commissioner's code of practice.

CCTV images are kept securely and normally deleted after 3 months. We have a review process to monitor CCTV management and to endeavour to ensure compliance with our CCTV policy and procedure.

Access to CCTV is limited to staff members who have a legitimate reason to view it, and will only be shared with third parties, such as the police, under certain circumstances such as the prevention and detection of crime, or other third parties where we have a lawful basis for sharing.

Customers are not permitted to access LiveWest CCTV footage although we may provide footage containing personal data as part of a Subject Access Request.

Body worn cameras are used as a Health and Safety tool by our frontline colleagues as a deterrent from, and to capture evidence of, harassment and abuse when they are in difficult situations and feel at risk of harm. They are not used for routine recording of meetings.

How do we keep your data secure?

We are committed to ensuring that your information is secure. 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.

When you contact us via our Customer Service Team, you will be asked to verify your identity via password, or by providing other personal data. Without this, we will not be able to discuss your account and may not be able to process your enquiry any further.

How long do we keep your data?

Different types of data are kept for varying lengths of time. However, LiveWest has a retention schedule which outlines how long we keep information relating to you. Our retention periods are set in line with regulatory and legal requirements.

Information that we collect when you make contact with us

When you contact us, we may collect and retain certain information, for example, when you:

- Visit our website
- Contact us by social media
- Call our Customer Service Team
- Visit our offices

Visiting our website

Our website uses analytical software to allow us to track how popular our site is, to record visitor trends over time and to maximise our customer experience by obtaining feedback. Analytical software uses cookies to help track which pages are accessed. The cookies contain 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. We may ask you to provide certain identifiable information to access certain areas of our website, for example we may ask you to provide your postcode so you can find out who your housing officer is. Our Cookies Policy can be accessed via a 'pop up' each time you visit our website.

From time to time, we may embed external content from third-party websites, for example Twitter or YouTube. These external websites may utilise cookies or other similar technologies, and the privacy notice that will apply to such third-party content will be published on the third-party provider's website.

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 no longer have control of your personal data. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites as they are not governed by this privacy notice. You should exercise caution and look at the privacy statement applicable to the website in question.

Information that we collect when you call our Customer Service team

When you call our Customer Service team, we collect your phone number (Calling Line Identification or CLI). We use this to make our service better.

Calls to and from our Customer Service team, and other teams that help customers, are recorded. If your call is transferred to another LiveWest colleague, it will still be recorded. We keep these recordings in a secure system for 90 days, then delete them. However, if a call is abusive, problematic, or involves a complaint, we might save it for longer. Only a LiveWest senior manager can access these saved calls. Written transcripts of calls are kept according to our retention schedule.

How do we use call recordings?

We may use call recordings to make our services better for our customers and to help our colleagues do their roles. We also use them to investigate complaints or for legal reasons. When we use recordings for colleague training in public, we will not include any personal details that identify the caller unless they have given permission. Only authorised people, like a LiveWest team leader or senior manager, can listen to the recordings, and they will do this in a private setting.

Contacting our Customer Service team using our website, email, and social media

When you contact our Customer Service team via our website, by email or via social media, the information that you have provided will be transferred into the relevant housing management system. For example, if you contact us to report a repair, the information will be used within our systems to enable a repairs request to be raised. Emails and social media contacts may be copied and stored within your contact log.

Visiting our offices

When you visit our offices, we may collect the following personal data:

- Name, car registration number, and data relating to your visit. This is for fire safety purposes and is collected via a sign in/out book in our reception area
- Images captured on CCTV. CCTV is installed in public areas within our offices. We follow good practise as set out by the Information Commissioners Office and The Surveillance Camera Commissioners code of practise when using CCTV. Footage is kept securely and deleted after 3 months. CCTV is installed to ensure the health, safety and security of all staff and visitors to our offices.

Contact us

If you have any concerns about how we handle your personal data, you can get in touch with our data protection team or data protection officer:

Email: data.protection@livewest.co.uk

Call: 0300 123 8080

Or you can write to:

LiveWest
1 Wellington Way
Exeter
EX5 2FZ

You can also find more information about your data protection rights by looking at:

Your Rights section of this privacy notice: <https://www.livewest.co.uk/privacy-notice>

The Information Commissioners Office (ICO) website, along with information on how you can raise a concern with them: <https://ico.org.uk/make-a-complaint/>