

Privacy Statement

(Related to Data Protection Policy)



Directorate: Governance, Risk & Assurance

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What is Data Protection & GDPR

The UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA18) provide a set of rules and obligations for processing personal information. The UK GDPR applies to personal information we might hold, process and store about you within our paper files and on the systems that we use. The Data Protection Act 1998 sets out 8 data protection principles, and the UK GDPR sets 7 principles - both sets of legislation ensure that those organisations processing personal data do so in a fair, lawful and transparent manner. For that reason, we are required to ensure that your personal information is:

- Fairly and lawfully processed
- Processed for limited purposes
- Adequate, relevant and not excessive
- Accurate and up-to-date
- Not kept for longer than is necessary
- Processed in line with your rights
- Secure
- Not transferred to other countries without adequate protection.

The Information Commissioner's Office (ICO) is responsible for regulating, enforcing and promoting good practice and transparency of organisations. Salix Homes Limited is registered with the ICO to provide assurance that we use all personal information appropriately.

The information we collect and how we use it

Salix Homes collects and processes information about colleagues, Board Members and customers in order to fulfil our legal obligations as an employer and landlord. This includes, but is not limited to:

- Name and address;
- Contact details;
- Dates of birth for you and, if a customer, any others who live in your household;
- Information about your requirements dependant on the relationship you have with Salix Homes i.e. employer/employee, tenant/landlord etc; and
- Financial details.

We may also collect personal information which includes details about your ethnicity, religion, sexual orientation and any medical conditions. We understand that you may not feel comfortable answering some of these questions and consider them to be private. We ask these questions to make sure that we do not discriminate against any of our customers, colleagues or Board members.

Understanding the diversity of our customers, colleagues and Board members is very important to us, although we understand that you may feel uncomfortable providing this information and so you can refuse.

We primarily collect this information to:

- manage the relationship you have with Salix Homes;
- monitor compliance with the terms of the agreement/contract that is held;

- deliver support, where required;
- conduct surveys in order to monitor and improve our services; and
- monitor equality and diversity.

All calls made to our Contact Centre and our Communities Directorate (e.g. a Housing Officer or an Income Officer) are recorded for management, quality and accuracy purposes. All recorded calls are held within a UK based secure cloud for a maximum period of 12 months. The call recordings can only be accessed by a restricted group of colleagues within the business for security purposes.

Customer Portal

Salix Homes' customer portal – “MySalix” allows Salix Homes customers to manage their own accounts online. MySalix allows customers to update and view their information.

For more information, or to sign up, go to [MySalix | Salix Homes](#)

How we store and protect your information

Information in the main is held on our computer systems and some paper files. All of our computer systems and files have restricted access, which means that only the colleagues who need to see that type of information can see it.

Salix Homes uses software and storage that is predominately based within the UK. In some rare instances, mainly in relation to the information captured on our website, there may be data stored in the US. The information stored with these companies are subject to an International Data Transfer Agreement and any information shared subject to a Transfer Risk agreement. This is acceptable based on the ICO's current guidance.

Our network and infrastructure are protected by industry-leading and globally recognised firewalls.

We also use reputable antivirus and endpoint protection software to block executable files from running from removable media such as CD-ROMs, external hard drives, and USB drives.

Our websites use HTTPS as standard and we regularly monitor our systems for possible vulnerabilities and breaches.

Our infrastructure provider conducts independent penetration testing of their network regularly to identify any vulnerabilities.

How long we keep your information for and how we dispose of it

Salix Homes has a Data Retention Schedule for the data that we collect which may contain personal information.

The Data Retention Schedule lists the principal documentation that Registered Providers of social housing such as Salix Homes should keep, together with details of the statutory and recommended retention periods. The Data Retention Schedule is based on the model schedule as developed by

the National Housing Federation (NHF), and notes that it may be appropriate to keep documents for the longer than the minimum period laid down by law.

Once information has passed its retention deadline, it will be deleted. There are some instances with the software we use that mean we cannot delete the information, as the software does not allow us to do so. When this happens, your personal information will be anonymised or pseudonymised on the system and archived. In some circumstances, our ICT Team are able to delete your information using scripting tools.

Who we share your information with and why

Information held about you is generally for the purpose of managing the relationship with you. There may, however, be occasions when we must share information with others to enable us to deliver our services and fulfil our legal and contractual obligations. Examples include:

- in relation to customer repairs, rents and or benefit requirements;
- for statistical purposes;
- in relation to member and colleague remuneration and tax purposes;
- for legislative and regulatory purposes;
- for tailoring support to individuals;
- for the safeguarding of vulnerable adults and children.

Relevant information may be shared with:

- our contractors;
- our insurers and solicitors;
- other housing associations;
- the government;
- local authority;
- regulators;
- social services;
- the police;
- the fire service;
- health professionals; and
- other organisations we engage to perform data processing on our behalf.

Where we are legally required to do so, we will share information in the following circumstances:

- national security;
- defence;
- public security;
- the prevention, investigation, detection, or prosecution of criminal offences;
- other important public interests, economic or financial interests - including budgetary and taxation matters, utility and council tax, public health and security;
- the protection of judicial independence and proceedings;
- breaches of ethics in regulated professions;
- monitoring, inspection, or regulatory functions connected to the exercise of official authority regarding security, defence, other important public interests or crime/ethics prevention;
- the protection of the individual, or the rights and freedoms of others; or

- the enforcement of civil law matters.

Where necessary, we will aim to obtain a Data Sharing / Processing Agreement with organisations we share personal information with. The Agreement makes clear to the other organisation:

- how they are to use the information;
- who can have access to it;
- how long they can keep the information for;
- how to dispose of the information;
- what security measures they must have in place;
- what process to follow if a customer makes an Individual Rights request;
- what process to follow in the event of a data breach.

Data Sharing/Processing Agreements are regularly reviewed and we only share information that is absolutely necessary.

What communications we may send you

Salix Homes uses various communication methods to keep all customers updated on community events, provide information relating to each neighbourhood and to provide offers of support to all of our customers. We use the following methods to provide information to our customers:

- Newsletters
- E-newsletters
- Magazines
- Texts
- E-mail
- Phone Calls

We will send customers information on the following:

- events in neighbourhoods
- services from our partners
- news and updates affecting specific neighbourhood and services
- how to get involved
- job and training opportunities

Customers can opt out of these communications at any time using any of the below methods by:

- calling our contact centre on 0800 218 2000
- emailing our Data Protection Officer at datarequests@salixhomes.co.uk

Communications sent to colleagues and board members will generally be through email, post, text and phone calls.

Your Individual Rights

The UK GDPR and DPA18 details data rights for all individuals that can be exercised by customers, colleagues, and members. These rights are outlined in the table below and can be exercised by

contacting the DPO on datarequests@salixhomes.co.uk. Where you contact us about one of the rights below, we will seek to action your request within 1 month unless the request is complicated – in which case we may contact you to request an extension on the 1 month period in order to comply with the request.

Right	What this right involves and how to exercise it
Right of Access	You have the right to request a copy of all of your personal data that we process. This request can be made in writing, by email, in person, over the phone, or via the Salix Homes ChatBot facility. We will need to verify your identity before we process your request. These requests are commonly known as Subject Access Requests (SAR)
Right to Withdraw Consent	Where you have given your consent for your data to be processed, you have the right to withdraw that consent at any time.
Right to Rectification	If you believe we hold any incorrect data you have the right to request to have that data corrected, or any incomplete data finalised.
Right to Erasure	If you believe that the data we are processing is no longer necessary, or if you believe we no longer have a legal basis for processing it, you can request that your data is permanently erased.
Right to Restriction of Data Processing	If you believe that the data we are processing is inaccurate, or that we are processing it unlawfully, you can request that we temporarily restrict the use of that data until we can establish whether it should be permanently rectified or erased.
Right to Data Portability	You can request that your personal data is provided, via a commonly used, machine-readable format, to another data controller.
Right to Object	If you feel that we do not have a legitimate lawful basis for processing your personal data, you can object to the processing which may result in us no longer processing specific categories of data. You also have a specific right to object to your personal data being processed for the purposes of direct marketing if you do not wish to receive marketing communication from the Data Controller.
Rights in relation to Automated Decision Making	If a decision is made about you based solely on automated processing, you have the right to request a “human” review of this decision.

If your personal data is being processed on our behalf by a third party, Salix Homes will notify them if you exercise any of these rights above to ensure they comply with your request.

Website Terms & Conditions

Whilst using the Salix Homes website, Salix Homes may collect personal information from users. The information that the website collects, by itself or through third parties, is:

- Cookie and usage information.

- Other personal formation, as described in other sections of this policy or by means of a dedicated, contextual explanation provided at the point of information collection.

The information may be freely provided by the user, by submitting information via a webform for example, or collected automatically when using the website.

Any use of Cookies - or other tracking tools - by Salix Homes' website, or by the owners of third party services used by this website, unless stated otherwise, serves to identify users and remember their preferences, for the sole purpose of providing the service required by the user.

Salix Homes is fully compliant with cookie laws. The Salix Homes website includes a 'cookie consent preferences' tool, to allow website users to manage their consent options. Details of the cookies used by the Salix Homes website, and how they can be managed are published at <https://www.salixhomes.co.uk/privacy-policy/>

Salix Homes' website collects and stores information as follows:

Methods of processing

- Salix Homes processes your information in a proper manner and shall take appropriate security measures to prevent unauthorised access, disclosure, modification, or unauthorised destruction of the Information.
- The information is processed using computers and/or IT enabled tools, in line with Salix Homes' procedures, for the purposes explained in the "The information we collect from you and how we use it" section.

Analytics

- The services contained in this section enable Salix Homes to monitor and analyse web traffic and can be used to keep track of how you use our website. Salix Homes uses Google Analytics (Google), which is a tool for analysing the use of our website (including time of visit, pages visited, type of browser, type of operating system, IP address etc.).
- Google Analytics may also be used to prepare reports on its activities and share them with other Google services. Google may use the information collected to contextualise and personalise the ads of its own advertising network.
- Google Analytics is currently covered by Standard Contractual Clauses.

Additional information about the collection and processing of your information

Legal action - Your information may be used for legal purposes by Salix Homes, in Court or in the stages leading to possible legal action arising from improper use of our website or related services.

System Logs and Maintenance - For operational and maintenance purposes, Salix Homes' website, and any third-party services, may collect files that record interaction with the website (System Logs) or use for this purpose other information (such as an IP Address).

Contact Us

If you require any further information on Data Protection or how Salix Homes uses your personal information, please contact the Governance Team at:

Salix Homes
Diamond House
2 Peel Cross Road
Salford
M5 4DT

datarequests@salixhomes.co.uk

0800 218 2000

Salix Homes has in place a video service for deaf or hard of hearing customers (details can be found via the intranet link below):

www.salixhomes.co.uk/news/salix-homes-launches-new-video-service-deaf-customers