

## ASTER GROUP PRIVACY NOTICE

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## INTRODUCTION

Aster Group is committed to protecting your personal information, being transparent about what data we hold and giving you control over how we use it.

We play a big part in the communities in which we are based – we may have interactions with people who would not normally expect to deal with us; this is because we do not just provide homes, we provide many other services as well.

The purpose of this Privacy Notice is to give you a clear explanation about how Aster Group uses personal information we collect from you.

This is the main Privacy Notice for Aster Group. However, some of our products and services may have additional privacy policies so you should read these when you sign up for these services. It is important for you to read this Privacy Notice in full to understand what information we hold about you, how we may use it and how you can access, update and request to delete your personal information.

It applies to information about;

- Aster's tenants, customers and other service users for example garage account holders and Telecare users,
- Members of the public that may have cause to deal with Aster in relation to a land or property issue,
- Aster's job applicants, employees, non-executive board members, independent committee members, shareholders and temporary agency staff.

Please read on below for more information about how we use your personal information. To make it easier to find the area relevant to you, we have split this into the customer and employee categories above.

In using our website, you are consenting to us collecting and using personal data about you as explained below in accordance with this Privacy Notice. Should we choose to change these terms for any reason, the changes will be posted here so that you are always kept informed about the collection and use of your personal information, and when we disclose it.

This Privacy Notice will be updated to reflect changes either to the way we operate or changes to Data Protection legislation. To make sure that you keep up to date, we suggest that you revisit this notice from time to time.

## PART 1 ASTER CUSTOMERS & SERVICE USERS

Please read this Section as it applies to all customers and service users of Aster

### YOUR PERSONAL INFORMATION

#### Why we collect and store personal information

Aster needs to collect, process and store personal information about you and other household members\* in order to operate as a registered provider of affordable housing, an ethical house builder and to deliver efficient and effective services.

*\* When you provide information about household members we assume that you do so with their full knowledge and consent.*

We will only ask for personal information that's needed to help us deliver our services and enable us to tailor our service offering. We will not collect more information than is needed to provide you with the services you require.

#### How we collect personal information about you and how it is used

- You may provide personal information when communicating with us
- You will provide us with personal information when setting up a tenancy, buying a home or other service with us
- We may receive information about you from your Local Authority Choice Based Lettings Team when you enquire about a tenancy or from government scheme agencies that provide aid with affordable home ownership
- It may be that you provide us with details of your bank account in making payments to us
- You may use our services and give your name and e-mail address to make a comment about our services or website

**We're committed to keeping your personal details up to date, and we encourage you to inform us about any changes needed to make sure your details are accurate. Out of date contact information may result in a delay in getting you help when you need it.**

#### How we protect your information

We have strict security procedures covering the storage of your information in order to prevent unauthorised access and to comply with the terms of Data Protection law. It is our policy to verify your identity before we discuss your account with you and we may ask you for proof of identity or for other personal information before we can process your call or enquiry further.

## Information we may hold about you and how we use it

*(Most of these examples apply to customers who have tenancies with us but may be applicable to other service users)*

The information we hold on our records concerns our relationship with you. For example:

- **Names and dates of birth, photographic ID and information about your previous housing circumstances** – needed to assess housing applications and help prevent tenancy fraud, identity theft and illegal subletting
- **Your contact details including email address** - so we can communicate with you and keep you informed about services we offer which may be useful to you. We will also send an automated email to you to validate your email address
- **Information about your needs and requirements** - needed to make sure our services are accessible; that we take account of any care and support needs in our dealings with you; and to improve our communications with you. For example, if you are involved with a carer or social worker; if you need adaptations in your home or if you need large print or translated text
- **Information to assist us in delivering housing management services** – this may include changes in circumstances and information about housing options (e.g. if you have a medical need which means you need to move), complaints, reports and evidence of anti-social behaviour, including CCTV footage and sound recordings.
- **Financial records** – we keep records about the amount of money you have paid us; any amount(s) outstanding and associated recovery action
- **Information about any additional guidance and care and support services you may need** - for example, in connection with access to training and employment, we may hold information about your job history, skills and experience, or if we support you to improve your financial circumstances, we may hold information about your household income and expenditure
- **Recordings of your telephone calls to us** - some calls to our contact centre are recorded for training and monitoring purposes so we can make sure we are delivering a good service \*\*
- **IP Address** – we may capture your IP address when you visit our website
- **Equality and Diversity data** – for example, ethnic origin, used for monitoring purposes only
- **Your image** – we may capture your image on our surveillance systems if you visit an estate, office or community facility which is covered by this facility \*\*
- **Market research and customer satisfaction surveys** - these help us to monitor our performance and improve our services.

*\*\* Call recordings and surveillance recordings will be held in accordance with our corporate retention policy before being erased.*

This list is not exhaustive as we hold records of the contact we have with you, or about you, and process this information so we can deliver your services in the best way possible. Generally, the information we hold will have been provided by you (on application or via enquiry forms or when we communicate with you), but we may also hold information provided by third parties where this is relevant to your housing or care circumstances, for example, from local authorities, social workers and health professionals such as doctors and occupational therapists.

In some circumstances, you can refuse to provide your details if you think a request is inappropriate. However, this may impact our ability to provide you with some services.

## **Processing Special Categories of Personal Data**

In the course of your contract with Aster, we may need to process Special Categories of your personal information where you have provided these to us.

Special Categories of data include;

- Racial or ethnic origin
- Political opinions
- Religious beliefs, or other beliefs of a similar nature
- Trade union membership.
- Physical or mental health or condition
- Sexual life
- Commission or alleged commission of any offence
- Any proceedings for any offence committed or alleged to have been committed.

Under Data Protection law, Special Categories of personal information can only be processed where there is a specific lawful basis for doing so.

As a provider of social housing and associated services, our primary lawful basis under the Data Protection Act 2018 is *'where the processing is necessary for the purposes of performing or exercising obligations or rights of the controller or the data subject under social security law or the law relating to social protection'*.

This includes providing you with support or signposting in areas such as,

Sickness, healthcare or disability needs,  
Unemployment and training programmes  
Safeguarding and protecting the vulnerable  
Family, lifestyle and children's needs  
Financial and benefits needs/advice  
Bereavement and survivorship

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Social inclusion and helping you to feel part of a community

We may need to share this with statutory agencies such as local authorities, the police and NHS in order to fulfil our responsibilities to you.

We also have a legal obligation to process special categories of data to monitor equal opportunity and treatment of customers, however this is for statistical purposes only and but not in relation to individuals.

Outside of these purposes, our primary lawful basis is 'individual consent'. Therefore where you have opted for an additional service such as a home adaptation or telecare service we will gain your consent to process your Special Categories of information.

We may also refer you to charitable or support organisations with your consent.

## **'My Account' service**

If you have a tenancy with us we encourage you to use 'My Account' which is an online service enabling you to access your account and manage your personal details making sure they are up to date so we are not holding inaccurate information about you.

## **How we manage your personal information**

Your personal information will be processed in accordance with the principles of Data Protection law. This means it will be:

- processed lawfully, fairly and in a transparent manner
- collected for specified, explicit and legitimate purposes
- adequate, relevant and limited to what is necessary
- accurate and where necessary kept up to date
- kept in a form which permits identification for no longer than is necessary for the purposes for which it was processed
- processed in a manner that ensures appropriate security of the information we hold.

Access to your personal information will be restricted to authorised individuals on a strictly need to know basis.

We're committed to keeping your personal details up to date, and we encourage you to inform us about any changes needed to make sure your details are accurate.

To help us ensure that your personal information is kept confidential, we will ask you security questions to confirm your identity when you call us. We won't discuss your personal information with anyone other than you, unless you've given us prior written authorisation to do so by completing a [Permission to Share Form \[link\]](#).

## **Sharing your personal information**

There will be times when we will share relevant information with third parties for the purposes as outlined above, or where we're legally required to do so.

For specific details on who we may share your information with, please refer to the relevant customer or employee Section in this Privacy Notice.

When sharing your personal information, we will comply with all aspects of Data Protection law. Our lawful basis for doing this includes:

- the performance of a contract

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- compliance with a legal obligation
- legitimate interests of Aster
- legitimate interests of the individual concerned
- to protect an individual's vital interests, e.g. *in a medical emergency*

If none of the above applies, we will seek your consent to process your information. Special categories of personal information about health, sexual life, ethnicity, religion and criminal activity are subject to particularly stringent security and confidentiality measures; before we can share this information we will ensure we meet one of the additional conditions under Data Protection law as well as a lawful basis for doing so.

### **Data Sharing and Data Processing Agreements**

It is Aster's operating policy to have agreements in place where we regularly share with third parties. More information on this can be found in our [Data Protection, Privacy & Confidentiality Policy \[link\]](#).

### **How long information is kept for**

For specific details on how long we keep your information for, please refer to the relevant customer or employee section in this Privacy Notice.



## IF YOU HAVE A HOUSING TENANCY WITH US

*This section applies to our customers who have a tenancy with us.*

Aster aims to deliver reliable housing services and deliver an efficient and effective service to you when you take out a tenancy with us.

In order to progress your tenancy, Aster needs to collect, process and store personal information about you, your next of kin and other household members\*.

The lawful basis is:

- the performance of a contract
- compliance with a legal obligation
- legitimate interests of Aster
- legitimate interests of the individual concerned
- to protect an individual's vital interests, e.g. in a medical emergency

*\* When you provide information about your next of kin and household members we assume that you do so with their full knowledge and consent. Next of kin information will only be used in the event of an emergency.*

## **Sharing your personal information**

Where necessary or required, we may share information as follows:

- **Our contractors** - in order to undertake repairs, maintenance, adaptations or improvement works
- **Third party service providers** - in connection with services performed on our behalf
- **Tenant / customer panels** – to review our processes and the services we provide
- **Other housing associations, trusts and landlords** - in connection with tenancy references and associated enquiries, mutual exchanges and management transfers
- **Community partners** - in connection with the delivery of coordinated local services
- **Utility companies, Council Tax Offices and their representatives** - in connection with the setting up and supply of services and unpaid bills (e.g. gas, electricity, council tax and water)
- **Credit reference agencies and debt collection agencies** - in connection with some housing applications and in relation to any outstanding charges owed once residents leave their Aster home
- **Local authorities and government departments** - as necessary for administering justice, or for exercising statutory, governmental, or other public functions including statistical purposes

- **Experian Rental Exchange** – so you can be recognised for paying your rent on time, enhancing your credit record – you can view the rental exchange privacy notice [here](#)
- **The Police and other relevant authorities (e.g. Probation Service, Department of Work and Pensions, HM Revenues and Customs)** - in relation to the prevention or detection of crime and fraud; the apprehension or prosecution of offenders and the assessment or collection of tax or duty
- **Other statutory organisations, e.g. social services and health authorities** - as necessary for exercising statutory functions
- **With our regulators** - the Regulator for Social Housing (RSH), Health & Safety Executive (HSE), The Housing Ombudsman, to comply with our regulatory obligations.

We may use third party providers to enable you to pay your rent to us in different ways and resolve queries relating to your rent payments.

If your household entered a new social housing tenancy after 1989, Aster as a social housing provider are required to share your personal information with the Ministry of Housing, Communities and Local Government (MHCLG) for research and statistical purposes. Their Privacy Notice, explaining how your information is used can be found [here](#).

This list isn't exhaustive as there are other circumstances where we may also be required to share information, for example:

- in connection with legal proceedings (or where we're instructed to do so by Court order)
- to protect the vital interests of an individual (in a life or death situation).

### **How long information is kept for**

Aster will only collect and retain the personal data it needs for each specified purpose and will periodically review whether aspects of data sets can be minimised so individuals (data subjects) are no longer identifiable. Examples of when it would be appropriate to do this include satisfaction surveys or historical schedules of works.

If your application for a home is unsuccessful, we will retain your information for 6 months before securely destroying it.

### **Information we need to retain about you if you leave your Aster property**

When you are no longer a tenant with us, provided there is no ongoing contact with you or outstanding arrears, we will retain your tenancy file for 6 years after which time it will be securely destroyed.

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If after 6 years, there is still ongoing contact with you or you are still in arrears, we will retain your tenancy file for 6 months after the last contact with you after which time it will be securely destroyed.

As a Registered Housing provider we will need to keep a minimal amount of information about your tenancy permanently, should you or we need to prove your tenancy at a future date or you choose to re-apply for an Aster property. The information we retain permanently will be your;

- Name
- Date of Birth
- NI number
- Address of the tenancy
- Tenancy start date
- Tenancy termination date
- A copy of your Tenancy Agreement

## **IF YOU HAVE A SHARED OWNERSHIP HOME WITH US OR ARE LOOKING TO BUY ONE**

*This section applies to the purchase and ownership of a shared ownership property*

### **Why we collect and store personal information**

Aster aims to be an ethical housing provider and deliver an efficient and effective service to you when you choose to buy your shared ownership home with us.

In order to progress your property purchase, Aster needs to collect, process and store personal information about you and other household members\*.

The lawful basis is:

- the performance of a contract
- compliance with a legal obligation
- legitimate interests of Aster
- legitimate interests of the individual concerned

*\* When you provide information about household members we assume that you do so with their full knowledge and consent.*

### **How we collect personal information about you and how it is used**

We will collect personal information directly from you or through your conveyancing solicitor (on your behalf). We may also hold information provided by third parties where this is relevant to your interest in purchasing a property or the progression of your home purchase, for example, estate agents, solicitors, lenders, Help to Buy Schemes and property builders. We will receive information from government scheme agencies that aid with affordable home ownership.

Your information will only be used in relation to the purchase of your home and not for any other purpose.

If Aster will be providing communal area services to your home after your purchase, some of your details will be passed to our Home Ownership and Service Charges Teams.

In addition, we may hold records of the contact we have with you, (e.g. emails, letters or telephone calls) or about you, and process this information so we can sell you a shared ownership property. Generally, the information we hold will have been

provided by you (on application or via enquiry forms or when we communicate with you).

## **Sharing your information with third parties**

Where necessary or required, we may share information as follows:

- **Lenders and solicitors** - to deal with your property purchase
- **With our regulators** – The Council of Mortgage Lenders (CML)
- **The house builder or their contractors** - so that identified defects can be dealt with and the 12 month defects inspections can be dealt with
- **Local Authorities** – to notify of new ownership for Council Tax purposes

This list isn't exhaustive as there are other circumstances where we may also be required to share information, for example in an emergency situation.

## **How long information is kept for**

Aster only holds records during the period of our relationship and for a set period afterwards to allow us to meet our legal obligations including resolving any follow up issues between us.

Our standard retention period is 6 years after you have either purchased the remaining share or sold your property. We will securely destroy any information that we no longer need to use in relation to you and which we are not required to keep under other laws.

## **IF YOU BUY A HOME OUTRIGHT FROM US OR ARE LOOKING TO PURCHASE ONE**

*This section applies to the purchase of new homes and previously tenanted Aster homes.*

### **Why we collect and store personal information**

Aster aims to be an ethical housing provider and deliver an efficient and effective service to you when you choose to buy your home with us.

In order to progress your property purchase, Aster needs to collect, process and store personal information about you and other household members\*.

The lawful basis is:

- the performance of a contract
- compliance with a legal obligation
- legitimate interests of Aster
- legitimate interests of the individual concerned

*\* When you provide information about household members we assume that you do so with their full knowledge and consent.*

### **How we collect personal information about you and how it is used**

We will collect personal information directly from you or through your conveyancing solicitor (on your behalf). We may also hold information provided by third parties where this is relevant to your interest in purchasing a property or the progression of your home purchase, for example, estate agents, solicitors, lenders and property builders.

Your information will only be used in relation to the purchase of your home and not for any other purpose.

If Aster will be providing communal area services to your home after your purchase, some of your details will be passed to our Service Charges Team.

In addition we may hold records of contact we have with you, (e.g. emails, letters or telephone calls) or about you, and process this information so we can sell you a property. Generally, the information we hold will have been provided by you (on application or via enquiry forms or when we communicate with you).

### **Sharing your information with third parties**

Where necessary or required, we may share information as follows:

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- **Lenders and solicitors** - to deal with your property purchase
- **With our regulators** – The Council of Mortgage Lenders (CML)
- **The house builder and their contractors** - so that repairs or the 12 month defects inspections can be dealt with
- **Local Authorities** – to notify of new ownership for Council Tax purposes
- **Utility companies** – in relation to service charges if you are purchasing a previously rented Aster property.

This list isn't exhaustive as there are other circumstances where we may also be required to share information, for example in an emergency situation.

### **How long information is kept for**

Aster only holds records during the period of our relationship and for a set period afterwards to allow us to meet our legal obligations including resolving any follow up issues between us.

For property sales Aster will hold your information for a maximum of 6 years after the sale has been completed unless you are receiving additional services from Aster.

If you exercise the right to buy your property under Right to Buy or Right to Acquire legislation, we will securely destroy any information that we no longer need to use in relation to you and which we are not required to keep under other laws. Our standard retention period is 6 years.

## IF YOU HAVE A LEASEHOLD WITH US

*This section is for individuals living in properties with an Aster leasehold.*

### **Why we collect and store personal information**

Aster needs to collect, process and store personal information about you in order to deliver an efficient and effective service to our leaseholders.

The lawful basis is:

- the performance of a contract
- compliance with a legal obligation
- legitimate interests of Aster
- legitimate interests of the individual concerned

### **How we collect personal information about you and how it is used**

We will collect personal information directly from you or your solicitors when you move into your property. You may complete a questionnaire we send you asking for your personal information so we can contact you about your lease and any charges you need to pay. You may give us your financial information so that you can pay service charges.

This list is not exhaustive as we hold records of most contact we have with you, or about you, and process this information so we can deliver the leasehold service to you. Generally, the information we hold will have been provided by you.

We will only ask for personal information that's needed to help us deliver the service; we will not collect more information than is needed to provide you with the service you require.

In some cases, you can refuse to provide your details if you think a request is inappropriate. However, this may impact our ability to provide you with the leasehold service.

We're committed to keeping your personal details up to date, and we encourage you to inform us about any changes needed to make sure your details are accurate.

### **Who we share your data with**

Where necessary or required, we may share information as follows:

- **Contractors** - to carry our repairs and maintenance work
- **Solicitors** - for queries relating to the sale or purchase of your property
- **Credit reference agencies and debt collection agencies** - in relation to any outstanding charges owed.



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This list isn't exhaustive as there are other circumstances where we may also be required to share information, for example:

- In an emergency
- For the prevention or detection of crime

## **How long information is kept for**

Aster only holds records during the period of our relationship and for a set period afterwards to allow us to meet our legal obligations including resolving any follow up issues between us.

For property owners with an Aster leasehold, we will hold your information for a maximum of 12 years after you have sold your property.

We will securely destroy any information that we no longer need to use in relation to you and which we are not required to keep under other laws.

## IF YOU HAVE A PRIVATE RENT PROPERTY WITH US

### **Why do we collect and store personal information**

Aster needs to collect, process and store personal information about you in order to deliver an efficient and effective service to our private rent customers.

The lawful basis of this, under the Data Protection Act is, the performance of a Contract.

### **How do we collect personal information about you**

- You may provide personal information when contacting us
- We may be given your information by the letting agents when you enquire about a property

### **Information we may hold about you and how we use it**

The information we hold on our records concerns our relationship with you. For example:

- **Names and dates of birth**, – needed to help identify you
- **Your contact details** - so we can communicate with you by your preferred means, and keep you informed about works that may need to be done
- **Financial information** – for example, your bank details to enable you to pay rent
- **IP Address** – when you visit our website
- **Your image** – we may capture your image on our surveillance systems if you visit an estate, office or community facility which is covered by this facility \*\*
- **Recordings of your telephone calls to us** - some calls to our contact centre are recorded for training and monitoring purposes so we can make sure we are delivering a good service \*\*

\*\* Call recordings and surveillance recordings will be held in accordance with our corporate retention policy before being erased.

This list is not exhaustive as we hold records of most contact we have with you, or about you, and process this information so we can deliver the tenancy service to you. Generally, the information we hold will have been provided by you.

We will only ask for personal information that's needed to help us deliver the service; we will not collect more information than is needed to provide you with the service you require.

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In some cases, you can refuse to provide your details if you think a request is inappropriate. However, this may impact our ability to provide you with the tenancy service.

We're committed to keeping your personal details up to date, and we encourage you to inform us about any changes needed to make sure your details are accurate.

Where necessary or required, we may share information as follows:

- **Contractors** - to carry our repairs and maintenance work
- **Debt collection agencies** - in relation to any outstanding rent owed.
- **Deposit Protection Scheme (DPS)** – in relation to the deposit you paid.

This list isn't exhaustive as there are other circumstances where we may also be required to share information, for example:

- In an emergency
- For the prevention or detection of crime

## **How long is information kept for**

Aster only holds records during the period of our relationship and for a set period afterwards to allow us to meet our legal obligations including resolving any follow up issues between us.

For private rent customers Aster will hold your information for a maximum of 6 years after the you have ceased to be a tenant.

We will securely destroy any information that we no longer need to use in relation to you and which we are not required to keep under other laws.

## **IF YOU RENT A GARAGE FROM US**

*This section is for those customers who rent a garage from Aster*

### **Why we collect and store personal information**

Aster needs to collect, process and store personal information about you in order to set up and manage your Garage Licence Agreement with us.

The lawful basis is:

- the performance of a contract
- compliance with a legal obligation
- legitimate interests of Aster
- legitimate interests of the individual concerned

This list isn't exhaustive as there are other circumstances where we may also be required to share information, for example:

- In an emergency
- For the prevention or detection of crime

### **How we collect personal information about you and how it is used**

When you apply for a garage agreement with Aster we will need to collect the following;

- Name, address and contact details
- Any registered disability
- Date of birth and National Insurance Number (to enable us to conduct identity and credit checks)

Once your garage application has been approved we will need to verify your identity by seeing some formal ID such as a passport or driving licence. We will also require your bank details in order to set up a direct debit on your account for rent payable. During the course of your agreement with us, we will use this information to manage your tenancy.

### **Who we share your data with**

In order to carry out maintenance and repairs to your garage we will need to share your contact details with our maintenance contractors. This is to keep you informed of works taking place and also to gain access to the garage.

If you fall into arrears with your rental payments and we do not hear from you, we will pass your details onto our Customer Accounts Team to resolve. If we still do not hear from you we may pass your details onto debt recovery agencies or Courts.



### **How long information is kept for**

If you choose to end your Garage Licence Agreement with us, we will retain your data for 6 years after the end of your Agreement. We will securely destroy any information that we no longer need to use in relation to you and which we are not required to keep under other laws.

## HELPING YOU TO LIVE INDEPENDENTLY IN YOUR HOME – ASTER'S INDEPENDENT LIVING SERVICE

*This section covers customers that receive a disabled adaptation or Telecare service from Aster*

### **IF YOU NEED AN ADAPTATION MADE TO YOUR ASTER HOME**

#### **Why we collect and store personal information**

Aster needs to collect, process and store personal information about you in order to deliver an efficient and effective service.

The lawful basis is:

- the performance of a contract
- compliance with a legal obligation
- legitimate interests of Aster
- legitimate interests of the individual concerned

#### **How we collect personal information about you and how it is used**

We will collect personal information directly from you or in the case of an adaptation that you require from a healthcare professional such as a doctor or occupational therapist.

In some cases, you can refuse to provide your details if you think a request is inappropriate. However, this may impact our ability to provide you with the service you need.

#### **Who we share your data with**

- **Our contractors** - in order to carry out the work or adaptations that need to be done
- **Healthcare professionals** – such as an occupational therapist to ensure you get the adaptation you need.

This list isn't exhaustive as there are other circumstances where we may also be required to share information, for example in an emergency situation.

#### **How long information is kept for**

As you already have a tenancy with Aster we may add some of this information to your tenancy file and we may use it for other aspects of your tenancy with us where it can help us tailor services to meet your needs.

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We will securely destroy any information that we no longer need to use in relation to you and which we are not required to keep under other laws. Our standard retention period is 6 years, although for social housing tenants we will retain enough information to prove your length of tenancy status, should it be required.

## IF YOU RECEIVE A TELECARE SERVICE FROM US

### Why we collect and store personal information

Aster needs to collect, process and store personal information about you in order to deliver an efficient and effective Telecare service.

The lawful basis is:

- the performance of a Contract
- Legitimate interests of Aster
- Legitimate interests of the individual concerned
- Necessary for compliance with a legal obligation

### How we collect personal information about you and how it is used

The information we hold on our records concerns our relationship with you. For example we will hold,

- your name, address and date of birth so we can identify you when you call and also your contact details such as telephone number or email address so we can communicate with you and keep you informed about the services you use
- we will hold the names, addresses and other contact information for your next of kin
- you may tell us about your health and disabilities so we can make sure you get the service you need and that is it accessible to you.
- you will provide us with your financial details, for example, your bank account information so that you can make payments to us. We may also use your information to recover any monies owed to us.

This list is not exhaustive as we hold records of most contact we have with you, or about you, and process this information so we can deliver the Telecare service to you. Generally, the information we hold will have been provided by you (on application or via enquiry forms or when we communicate with you), but we may also hold information provided by third parties where this is relevant to your circumstances, for example, from your relatives, from health professionals such as doctors and occupational therapists.

We will only ask for personal information that's needed to help us deliver the service; we will not collect more information than is needed to provide you with the service you require.

In some cases, you can refuse to provide your details if you think a request is inappropriate. However, this may impact our ability to provide you with the Telecare service.



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We're committed to keeping your personal details up to date, and we encourage you to inform us about any changes needed to make sure your details are accurate. Out of date contact information may result in a delay in getting you help when you need it.

Special categories of personal information about your health is subject to particularly stringent security and confidentiality measures; before we can share this information we will need to consider the lawful basis for doing so.

### **Who we share your data with**

Where necessary or required, we will share information as follows:

- **the out of hours contact centre** – to be able to respond to you if needed
- **credit reference agencies and debt collection agencies** to recover any monies owed to Aster.

This list isn't exhaustive as there are other circumstances where we may also be required to share information, for example in an emergency situation or for the prevention or detection of crime.

### **How long information is kept for**

When you end your Telecare contract, we will retain your information for 1 year, after which time we will securely destroy any information that we no longer need to use in relation to you and which we are not required to keep under other laws.

If you enquire about a Telecare service but do not go ahead with the installation of Telecare equipment, your paperwork will be securely destroyed after 6 months.

## IF YOU RECEIVE SEWERAGE AND WATER SERVICES FROM US

### Why we collect and store personal information

Aster will collect, process and store personal information about you and your household members\* in order to set up and manage the provision of sewerage and water services to you.

*\* When you provide information about household members we assume that you do so with their full knowledge and consent.*

The lawful basis is:

- the performance of a Contract
- Legitimate interests of Aster
- Legitimate interests of the individual concerned
- Necessary for compliance with a legal obligation

### How we collect personal information about you and how it is used

The information we hold on our records concerns our relationship with you. For example your name, address and other contact details such as your telephone number enable us to identify you when you contact us and also to keep you informed about the services you use.

We will also need to know the completion date of sale so we know when to start charging you for water and sewerage services and your bank details to set up a direct debit so you can pay for the services.

This list is not exhaustive as we hold records of most contact we have with you, or about you, and process this information so we can deliver your services in the best way possible. Generally, the information we hold will have been provided by you but we may also hold information provided by third parties where this is relevant.

In some cases, you can refuse to provide your details if you think a request is inappropriate. However, this may impact our ability to provide you with some services.

### Who we share your data with

Where necessary or required, we may share your information as follows:

- **Contractors** - in order to carry out maintenance and repairs we will need to share your contact details with our maintenance contractors. This is also to keep you informed of works taking place.
- **Debt recovery agencies** – If you fall into arrears with your payments and we do not hear from you, we will pass your details onto our Customer Accounts Team to resolve. If we still do not hear from you we may pass your details onto debt recovery agencies or Courts.



**How long information is kept for**

We will securely destroy any information that we no longer need to use in relation to you and which we are not required to keep under other laws. Our standard retention period is 6 years after you no longer receive a service from us.

## **IF YOU HAVE ANY OTHER ENQUIRY OR MAKE A COMPLAINT TO US (NON CUSTOMERS)**

*This section is for individuals who make an enquiry or complaint to Aster for any reason, but are not a customer*

### **Why we collect and store personal information**

Aster will collect, process and store personal information about you and your household members\* in order to deal with your enquiries, for example, queries about our services, our estates, boundary and access queries and complaints.

*\* When you provide information about household members we assume that you do so with their full knowledge and consent.*

The lawful basis is:

- compliance with a legal obligation
- legitimate interests of Aster
- legitimate interests of the individual concerned

### **How we collect personal information about you and how it is used**

The information we hold on our records concerns our relationship with you. For example you will give us your name, address and other contact details such as your telephone number when you contact us.

## **IF YOU MAKE A GENERAL ENQUIRY TO US**

We will need to collect enough information to respond to your enquiry, for example your name, address and contact telephone number. We will only use this information for the purpose of the enquiry you have made.

## **IF YOU MAKE A COMPLAINT TO US**

When we receive a complaint from a person we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to process the complaint and to check on the level of service we provide. We do compile and publish statistics showing information like the number of complaints we receive, but not in a form which identifies anyone.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for one

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year from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Similarly, where enquiries are submitted to us we will only use the information supplied to us to deal with the enquiry and any subsequent issues and to check on the level of service we provide.

### **IF YOU HAVE A QUERY ABOUT ASTER OWNED LAND BEING SOLD OR REDEVELOPED NEAR YOU**

We have an ambitious programme of land and property regeneration in order to provide more affordable homes, and as a neighbouring resident you may have cause to speak to us, either by you making an enquiry or if we need to contact local residents with updates.

We would not normally hold your information but if you wish to be in contact with us regarding the intended use of the land or planned works going on, we will need to collect and store your contact details.

We may also need to pass these onto our land and property development consultants or contractors so that they can liaise with you directly. If this is the case we will always ask your consent to do so.

As you have contacted us, your contact details, including details of any correspondence with us, may be retained, as part of the relevant regeneration project file.

We will retain this for as long as is necessary, after which time it will be made anonymous or securely destroyed.

### **IF YOU HAVE A GENERAL ENQUIRY RELATING TO ASTER LAND OR PROPERTY**

You, or an agent acting on your behalf (e.g. a solicitor), may have cause to speak to us regarding land and property issues including (but not limited to): ownership enquiries, restrictive covenants, boundary and party wall issues, rights of access and land sales.

If you are not an Aster customer or tenant, we would not normally hold your information but if you make contact with us regarding land or property, we will need to collect and store your contact details on our systems to address your query.

As you have contacted us, your contact details, including details of any correspondence with us, may be retained, as part of the relevant property file. We

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will retain this for as long as is necessary, after which time it will be made anonymous or securely destroyed.

### **IF YOU ARE SERVED WITH A PARTY WALL NOTICE BY ASTER**

This may occur if your privately owned property adjoins an Aster owned property and we need to serve notice on you to carry out works affecting the party wall (or vice versa).

If you are not an Aster customer or tenant, we would not normally hold your information but if you make contact with us regarding the notice or intended works, we will need to collect and store your contact details on our systems to address your query.

As you have contacted us, your contact details, including details of any correspondence with us, may be retained, as part of the relevant property file. We will retain this for as long as is necessary, after which time it will be made anonymous or securely destroyed.

### **DIRECT MARKETING**

We would like to provide you with information about events, services and other information which we think you may find interesting. We may send you such information by mail or telephone unless you have registered with the appropriate Preference Service or have asked us not to.

We don't provide your personal information to other companies for their marketing purposes. However, we may aggregate anonymised information based on your personal information and disclose this to third parties, for example, local government for statistical purposes.

The information you provide us with will never be disclosed outside of the European Economic Area.

### **UNDER 18S AND CHILDREN**

We will collect names and dates of birth of other people living in your home to assess your suitability for certain properties. This could include information about your children or other people under 18 living with you. Their information will only be used for the purpose of providing tenancy services.

## WORK EXPERIENCE

### What we collect on you

If you do a work experience placement with Aster we will need to collect some personal information about you such as your name, address, date of birth, email address, telephone number, next of kin and school/college name.

### Why do we need this information?

This information is used by Aster to set up your work experience placement and also to ensure we comply with health and safety requirements while you are on your placement.

Sometimes Aster needs to collect information relating to health and disabilities (known as 'special categories' of information).

We need to know if you have a health issue or disability so that we can make sure you are safe and to ensure reasonable adjustments are made so you can have a full and enjoyable experience of working at Aster.

Your information will not be shared with any other organisations unless there is a medical emergency.

### What we do with it

We will only keep your information for the purpose of arranging your work experience placement with Aster. We will keep your information for 6 months after your placement / work experience has ended, after which time we will securely delete it.

## PEOPLE WHO CONTACT ASTER VIA SOCIAL MEDIA

If you interact with us via one of our social media accounts, for example, Twitter or Facebook, we may collect information about you for the purpose of informing you about our services. **Please be aware that any communication shared with us in this way, even direct messaging is not owned or controlled by Aster and we cannot be held responsible for how these sites manage data.**

## PRIVACY NOTICE PART 2 (EMPLOYEES, JOB APPLICANTS, AGENCY STAFF, NON EXECUTIVE DIRECTORS/ INDEPENDENT COMMITTEE MEMBERS OR SHAREHOLDERS)

### Why we collect and store personal information

We will need to collect, process and store personal information about you relating to your application, appointment or employment with Aster.

Our lawful basis is:

- the performance of a contract (*i.e. your employment contract*)
- compliance with a legal obligation
- legitimate interests of Aster
- legitimate interests of the individual concerned
- to protect an individual's vital interests, *e.g. in a medical emergency*

If none of the above applies, we will seek your consent to process your information.

### IF YOU APPLY FOR A POSITION AT ASTER

#### How we collect personal information about you and how it is used

- You may provide personal information when communicating with us
- You will provide us with information when completing a job application form or when submitting a CV to us.

As part of processing your job application we will collect the following personal data about you,

- Name
- Address and contact details
- CV and career history, including written and/or video formats
- Answers to application questions
- Any other information you wish to provide in support of your application
- Disability information\*
- Any criminal or driving convictions (for certain roles)\*
- Probity and declarations of interest

\*known as a 'Special Categories' of information

Data will be stored, used and shared in accordance with Data Protection legislation and will not be used for any purposes other than processing your application.



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If you are invited for an interview and consider yourself to have a disability, you will have the opportunity to request any reasonable adjustments that need to be made for the interview. This information will only be used for the purposes of the interview.

If you provide us with employment referees we will ask for your consent before contacting them.

### **Who we share your data with**

We use a third party (or 'Data Processor') to carry out aspects of the recruitment processes on our behalf. Data processed may only be used in accordance with our instructions and Data Protection legislation.

As part of our recruitment process, you may be requested to complete an online test with a third party provider. We only send them the minimum amount of data required to perform this action.

### **How long information is kept for**

If you are successful in your job application, the data you provided during your application and interview processes will be stored in your Aster employee file for the duration of your employment. It will then be retained for 6 years after you leave employment after which time it will be securely destroyed.

If your application is unsuccessful, the data you have provided as part of your application will be kept for 6 months after which time it will be securely destroyed. It will not be used for any other purpose.

## IF YOU ARE AN ASTER EMPLOYEE

### **How we collect personal information about you and how it is used**

During the course of your employment contract we will need to collect, store and process personal data you have given us, relating to your employment. This will include, but is not limited to,

- Name
- Address and contact details
- Equality & Diversity information; gender, ethnicity, religion, marital status, sexual orientation, disability (known as 'Special Categories')
- Photographs
- Health information
- Next of kin and family details\*
- Bank and financial details
- Driving licence, vehicle details
- Any criminal or driving convictions (for certain roles)
- Declarations of interest

\*to be used in the case of an emergency. When you provide this information, we assume that you do so with their full knowledge and consent

Data will be used for, but is not limited to,

- Paying and reviewing salary and other remuneration benefits
- Paying your pension
- Conducting appraisals, 1:1 reviews and other management interventions
- Providing appropriate health, medical and welfare support to support you in performing your role
- Providing Health assessments for night workers (if applicable)
- Lone Worker Risk Assessments
- Providing reasonable adjustments in the workplace including Personal Evacuation Plans if you have a disability or physical impairment
- Providing or arranging training and qualifications relevant to your role
- Identifying you as an Aster employee, ID badges etc.
- Company vehicle tracking
- Providing references and information to future employers or other third parties such as landlords
- Providing information to governmental and statutory bodies such as the HMRC, Department of Work and Pensions, Health & Safety Executive, Child Support Agency, Courts Service
- Providing information to third parties in the event of closure, merger, transfer or takeover of all, or part of, Aster Group.

## Processing Special Categories of Personal Data

In the course of your employment with Aster, we may need to process Special Categories of your personal information where you have provided these to us.

Special Categories of data include;

- Racial or ethnic origin
- Political opinions
- Religious beliefs, or other beliefs of a similar nature
- Trade union membership.
- Physical or mental health or condition
- Sexual life
- Commission or alleged commission of any offence
- Any proceedings for any offence committed, or alleged to have been committed.

Under Data Protection law, Special Categories of personal information can only be processed where there is a specific lawful basis for doing so.

As an employer, our primary lawful basis under the Data Protection Act 2018 is *'where the processing is necessary for the purposes of performing or exercising obligations or rights of the controller or the data subject under employment law'*. This includes processing activities such as administering your work pension, providing reasonable adjustments in the workplace in terms of disability or health needs and administering maternity, paternity and sickness benefits relating to your employment.

In line with our Equality and Diversity Policy Aster endeavour to provide employment and a working environment equally accessible to all staff without discrimination or prejudice. To allow us to monitor this, employee equality and diversity ('Special Category') data will be on your employee records but will also be used for monitoring and statistical purposes where it will be aggregated and anonymised.

Outside of these purposes, our primary lawful basis is 'individual consent', where you have opted for an additional employee benefit or programme such as healthcare benefits. In these cases we will gain your consent to process your Special Categories of information.

Providing your equality and diversity data is voluntary. You may amend or delete this data at any time during your employment through your employee self-service portal or by contacting People Services.

## **Who we share your data with**

We are required by law to provide data relating to your employment to statutory agencies such as HMRC, Department of Work and Pensions, Health & Safety Executive, Child Support Agency, Courts Service.

In the course of your employment we may also share your data with third party agencies acting on our behalf (our 'Data Processors'). Any such parties are only permitted to act on our instructions and in accordance with Data Protection legislation.

We may also share your data with third parties such as prospective employers or letting agencies for reference purposes if requested. In these cases we will seek your consent prior to sharing.

## **Sharing 'Special Categories' of information**

If applicable to your role, information will be shared with an Independent Safeguarding registered body regarding suitability for working with children and vulnerable adults.

To comply with our Transport Operators Licence, we will need to share any driving convictions employees in certain roles may have.

We may need to share medical information with contracted third party medical advisory bodies if applicable to your role or health needs, e.g. if you are a night worker or are on a recuperative work plan due to ill health.

We offer various colleague welfare support options for staff, including colleague support networks and third party counselling however we do not share your data, instead you share data directly. In these cases, we ensure that any information you give is treated in the strictest of confidence, in accordance with Data Protection guidelines and not shared or used for any other purposes.

## **Employee Benefits**

Aster employees have the option to opt into a number of benefits schemes provided by third parties. As your employer we will signpost you to these third parties only. In these cases, the providers are the 'Data Controller' regarding your data, not Aster. Any personal data you have provided to these parties will not be shared back to Aster other than where it has been aggregated and anonymised for statistical and monitoring purposes or for payroll purposes.

## **Employee Surveys**

We may on occasion ask you for your feedback on working for Aster. This information will be used to improve the employee experience of working for Aster. This data will always be anonymised and will not be held on your employee records.

## **Promotional photographs and articles**

During your employment at Aster, our Communications and Media teams may obtain promotional photographs or articles relating to your role or team. These may be published in articles on the Aster website, social media platforms and other web or hard copy communications.

We'll cease to hold or use photos of which you are a key figure within 2 months of you leaving, however should you be captured in a group photo, these may continue to be used for up to 6 years then destroyed, but informal images may continue to exist. Photographs in print publications previously circulated may continue to exist past this time

## **How long information is kept for**

The information you provided both during your application process and the course of your employment will be stored in your Aster employee file for the duration of your employment. If you leave your position with Aster it will then be retained for 6 years after which time it will be securely destroyed, unless there is a legal reason for retaining it e.g. *your pension*.

## **DRIVING ASTER FLEET VEHICLES**

If your role at Aster involves driving a fleet vehicle, e.g. a works van, you should be aware that Aster uses vehicle tracking devices within its fleet. Aster fleet vehicles are not authorised for private use.

Devices can record or transmit information such as the location of a vehicle, the distance it has covered, the hours in operation and information about the user's driving habits. Monitoring of vehicle movements, where the vehicle is allocated to a specific driver, and information about the performance of the vehicle can therefore be linked to a specific individual, fall within the scope of Data Protection Law.

Within Aster, the purposes for using these devices include,

- Working Time Directive: monitoring the number of hours the vehicle has been in use, to ensure operatives are not working excessive hours,
- Health & Safety: enabling the location of lone working operatives to be pinpointed should there be any concerns for their welfare,

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- Taxation: ensuring vehicles are not being used for private purposes as this has tax implications for individuals,
- Emergency work allocation: in the event of an emergency trackers allow Aster to deploy the nearest available vehicle to the address,
- Identifying the unauthorised use of vehicles outside of agreed working hours or location.

More details can be found in Asters Vehicle and Tachograph Procedure.

### EMPLOYEE PRIVACY AND USE OF ASTER IT SYSTEMS

As an employee you will need to use IT applications on the Aster network in the course of carrying out your role and in relation to your employment with us. This may include, but is not limited to;

- Communication applications such as email and Skype
- Operational databases and case management systems in relation to your role
- Personal and shared document drives
- Employee record systems (holding your personal information, leave, sickness, appraisals, expenses claims etc)
- Internet explorer applications

#### **What personal data we will collect**

We will collect records on your usage of the Aster network applications such as levels of activity.

We will obtain your IP address if you log onto the Aster network using a personal device.

We will obtain your social media activity if you tag Aster in a post from a personal or Aster social media account.

## IF YOU ARE ON AN EMPLOYMENT AGENCY PLACEMENT WITH ASTER

### **How we collect personal information about you and how it is used**

Aster may use employment agency staff to perform roles on a temporary basis. In these cases, the Data Controller is the Employment Agency and staff will give consent to the Agency direct.

Aster will obtain and process the following data about you,

- Your name
- Your contact details

This information will be used by your line manager to contact you and to keep a record of your placement e.g. for invoicing by the employment agency

### **How long information is kept for**

These details will be kept for 6 months after you leave your placement with Aster after which time they will be securely destroyed.

## IF YOU ARE A NON-EXECUTIVE DIRECTOR (NED), INDEPENDENT COMMITTEE MEMBER OR SHAREHOLDER AT ASTER

### **How we collect personal information about you and how it is used**

During the course of appointment ('Agreement for Services') we may need to collect, store and process personal data you have given us, relating to your appointment. This will include, but is not limited to,

- Name
- Address and contact details
- Equality & Diversity information; gender, ethnicity, religion, marital status, sexual orientation, disability (known as 'Special Categories')
- Photograph of you
- Next of kin details\*
- Bank details
- Driving Licence, vehicle details
- Any driving convictions (for certain roles)
- Declarations of interest

\*to be used in the case of an emergency. When you provide this information we assume that you do so with their full knowledge and consent

Data will be used for, but is not limited to,

- Paying or reviewing your remuneration and other benefits
- Conducting appraisal reviews
- Providing reasonable adjustments if you have a disability or physical impairment to enable you to fulfil your duties
- Providing or arranging training relevant to your role
- Identifying you as an Aster NED or Independent Committee Member, e.g. *ID badges, Director photographs etc.*
- Publishing your membership details, name, Board Member role, biography on our website and other media publications necessary in the course of our business
- Publishing details and minutes of Board meetings (which will include your name)
- Providing information to governmental, regulatory and statutory bodies (e.g. *NHF Register of Directors*)
- Providing information to third parties in the event of closure, merger, transfer or takeover of all, or part of, Aster Group.

### **Processing Special Categories of Personal Data**



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In line with our Equality and Diversity Policy Aster endeavour to a working environment equally accessible to all colleagues without discrimination or prejudice. To allow us to monitor this, employee equality and diversity ('Special Category') data will be used for monitoring and statistical purposes and will be aggregated and anonymised.

Special Categories of data include;

- Racial or ethnic origin
- Political opinions
- Religious beliefs, or other beliefs of a similar nature
- Trade union membership.
- Physical or mental health or condition
- Sexual life
- Commission or alleged commission of any offence
- Any proceedings for any offence committed, or alleged to have been committed.

Under Data Protection law, Special Categories of personal information can only be processed where there is a specific lawful basis for doing so.

Special Category data relating to you will not be used for individual measures or decisions, or shared with others unless this specifically relates to supporting you in your position e.g. *reasonable adjustments*, and in this case, we will always tell you we are using your data in this way and seek your consent where necessary.

### **Who we share your information with**

We are required by law to provide data relating to your appointment to statutory agencies and regulatory bodies such as HMRC, Companies House, Financial Services Authority (FSA), Financial Conduct Authority (FCA), Office of Fair Trading (OFT), National Housing Federation, Transport Commissioners Office and the Regulator of Social Housing (RSH).

In the course of your appointment we may also share your data with third party agencies acting on our behalf (our 'Data Processors'). Any such parties are only permitted to act on our instructions and in accordance with Data Protection legislation.

### **Promotional photographs and articles**

During your employment at Aster, our Communications and Media teams may obtain promotional photographs or articles relating to your role or team. These may be published in articles on the Aster website, social media platforms and other web or hard copy communications.

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We'll cease to hold or use photos of which you are a key figure within 2 months of you leaving, however should you be captured in a group photo, these may continue to be used for up to 6 years then destroyed, but informal images may continue to exist. Photographs in print publications previously circulated may continue to exist past this time

## **How long information is kept for**

The information you provided both during your application process and the course of your appointment will be stored in your Aster file for the duration of your position. If you leave your position with Aster it will then be retained for 6 years after which time it will be securely destroyed, unless there is a legal reason for retaining it.

## **PART 3 YOUR RIGHTS**

**(applies to anyone whose data is processed by Aster)**

Under Data Protection legislation you have following rights regarding your personal data,

- The right to be informed
- The right to submit a Subject Access Request
- The right to have data rectified or deleted
- The right to restrict or object to processing
- The right to data portability

Aster will ensure it has appropriate organisational and technical measures in place to allow individuals to exercise these rights;

### **The right to be informed**

We will be transparent about how we collect, use, store and share your data. This Privacy Notice is our way of keeping you informed.

### **Subject Access Requests**

Under the General Data Protection Regulation (GDPR), you have the right to ask us what personal data we hold about you and to request a copy of this information.

*This is known as a 'Subject Access Request' (SAR). We can best understand and support your request if it is made in writing. If you would like to know what information Aster holds about you, [click here to download the Subject Access Request Form](#). Your request must be accompanied by proof of your identity as detailed in the SAR form.*

We then have 1 month to provide you with the information you've asked for, although we will try to provide it as promptly as possible. The more detail you give us describing what you wish to receive, the quicker we will be able to locate it and respond.

In response to SARs, we will provide you with a copy of the information we hold that relates to you. This will not include information that relates to your property such as repair logs, surveyor reports or details of contractor visits, as this is not considered personal information.

If your SAR is being submitted by a third party (e.g. a solicitor or relative) on your behalf, the request must be accompanied by a signed authority to confirm that they have permission from you.

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If you need us to correct any mistakes contained in the information we hold about you, you can do so by contacting the Data Protection Officer at the address below.

### **How much does it cost?**

There is no charge for submitting a Subject Access Request.

### **How long will it take?**

By law we must reply to your SAR application within 1 month. However, failure to provide proof of identity may delay the processing of your application.

Once we have confirmed your identity we will send you a letter to acknowledge receipt of your request and let you know the date the information will be sent to you.

If you do not receive the information by the stated date, please let us know by:

- Emailing us: [dataprotection@aster.co.uk](mailto:dataprotection@aster.co.uk)
- Calling us: 01749 832118
- Writing to us: Data Protection Officer, Risk & Compliance, Aster Group, Flourish House, 2 Cathedral Avenue, Wells, Somerset, BA5 1FD

### **The right to have data rectified**

You are entitled to have personal data rectified if it is inaccurate or incomplete. We ask that you support us in this by informing us of any changes to your personal details or circumstances where relevant.

If Aster has disclosed the personal data in question to others, for example, other Housing Associations, or your Local Authority, we must contact each recipient and inform them of the rectification - unless this proves impossible or involves disproportionate effort. Aster will respond within one month unless the request for rectification is complex.

If we are not taking action in response to a request for rectification, Aster will explain to you why, informing you of your right to complain to the supervisory authority and to a judicial remedy.

### **The right to have data deleted**

Under Data Protection legislation, you have the right to have data deleted from any computer systems or paper records that Aster (the 'Data Controller') holds on you. This is also called 'the right to be forgotten'.

This could be for a variety of reasons such as there is no longer a reason for us to process your data or simply that you have withdrawn your consent, or that you no longer have a Tenancy or service agreement with us, or have left our employment.

This right will be upheld providing there is no legitimate or statutory (lawful) reason for Aster to retain the data.

You should be aware that if you decide to withdraw your consent, whilst you still have a Tenancy, other service agreement or are employed with us we may not be able to continue to supply you with services or employment. If our Legitimate Interests require us to retain this data we can lawfully refuse your request.

As the 'Data Controller' it is also our responsibility to notify any third parties processing data on our behalf ('Data Processors') if you request to have data deleted.

### **The right to restrict processing**

You have the right to restrict the processing of your personal data where you have a particular reason for wanting the restriction. This may be because you have issues with the content of the information we hold or how we have processed your data. Restriction would normally be used as a temporary measure whilst the reason for restricting applies, taking the data out of general use.

We will respond to any reasonable requests that are not unfounded or excessive, or unless there is a lawful basis to continue processing.

As the 'Data Controller' it is also our responsibility to notify any third parties processing data on our behalf ('Data Processors') if you request to have data processing restricted.

### **The right to object to processing**

You have the right to object to processing of your data being carried out for the purposes of our legitimate interests\*, research or marketing purposes (including profiling).

*\*if you have legitimate grounds relating to your particular situation.*

### **The right to data portability**

Under Data Protection legislation, the right to data portability allows individuals to obtain and reuse their personal data for their own purposes across different services. This applies to the data an individual has previously supplied to the Data Controller only.

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In line with the digital age, it allows them to move, copy or transfer personal data digitally from one IT environment to another in a safe and secure way, without hindrance to usability.

If you wish to discuss exercising this right, please contact the Data Protection Officer at [dataprotection@aster.co.uk](mailto:dataprotection@aster.co.uk)

### **The Right to withdraw consent**

You have the right to withdraw your consent to your personal data being processed, however this may prevent us from being able to provide you with the services you require.

### **Automated Decision Making**

Automated decision making is not used at Aster.

### **Transfer of personal data outside of the European Economic Area (EEA)**

Aster does not transfer personal data outside of the European Economic Area (EEA)

## PART 4 COOKIES

### What are cookies and how do you deal with them?

A cookie is a small text file that's stored on your computer, tablet or phone when you visit a website. It can help identify your device - like your PC or mobile phone - whenever you visit that website. They're used by most website, including Aster. To make the best use of our website, on whichever device you use, you will need to make sure your web browser is set to accept cookies.

The cookies used by Aster Group websites don't contain any of your personal information and we can't use them to find out who you are.

### What are cookies used for?

We use cookies and some other data stored on your device to:

- Give you a better online experience
- Allow you to set your personal preferences
- Protect your security
- Measure and improve our service
- Work with partners and measure marketing.

### What information is kept by the cookie?

A cookie will typically hold:

- The name of the website it has come from
- how long the cookie will stay on your computer or phone
- A value - usually a randomly generated unique number.

### What cookies does Aster use?

We use cookies set by the Aster web domain known as 'first-party' cookies.

Some are necessary for the functionality of the site, others provide information that we analyse to monitor and improve the site. These first-party cookies do not store or collect any personal information or anything that make you personally identifiable to us. Typically, the cookies generate a random, unique number to store information about a user.

Cookies for measuring website usage:

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- Google Analytics cookies: \_utma, \_utmb, \_utmc, \_utmz. Its purpose is to record how many people are using the website and how they move around the site once they've arrived.

Data stored by cookies:

- \_utma stores each user's number of visits, time of the first visit, the previous visit and the current visit
- \_utmb and \_utmc checks how long a visitor stays on the site: when a visit starts and ends
- \_utmz tracks where a visitor came from (search engine, search keyword, link).

Duration of cookies:

- \_utma expires two years after your last visit to this site
- \_utmb expires 30 minutes after your visit, or after 30 minutes of inactivity
- \_utmc expires at the end of a session (when you close your browser)
- \_utmz expires six months after it was last set.

### Third party cookies (cookies set by other websites through our pages)

Some cookies are served by an external service when you use a page on our site, known as 'third-party' cookies.

For example, on a number of pages we use 'plugins' such as Twitter, Facebook and Flickr. These cookies are specific to the third-party site domain - the data stored in them can be seen and managed by the third party, not by us.

Although we can control whether we use the third-party services within our websites, we do not have control over the cookies themselves. It is not always possible to identify precisely the information that the cookies store.

### How do cookies affect my privacy?

You can visit our website without revealing any personal information. We protect your personal information very carefully. The security and safety of your personal information is very important to us. We may ask you for personal information for security reasons or so you can use our services.

### How to control and delete cookies

We will not use cookies to collect personally identifiable information about you. However, if you wish to restrict or block the cookies which are set by our websites, or indeed any other website, you can do this through your browser settings. The 'Help' function within your browser should tell you how.



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Alternatively, you may wish to visit the [About Cookies website](#), which contains comprehensive information on how to do this on a wide variety of browsers. You will also find details on how to delete cookies from your machine as well as more general information about cookies.

### **What happens if I don't accept cookies?**

If you decline cookies, some aspects of the Aster site may not work on your computer or mobile phone and you may not be able to access areas you want on the website. For this reason, we recommend that you accept cookies.

### **What happens if I delete my cookies?**

If you delete all your cookies, you will have to update your preferences with us again and some aspects of our site may not work.

### **Traffic data**

We may provide aggregate statistics about sales, customers, traffic patterns and information to third parties, but these statistics will not include any information that identifies you.

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## PART 5 CONTACTING US

If you would like to talk to us about how we handle your personal data, please contact our Data Protection Officer:

**Email:** [dataprotection@aster.co.uk](mailto:dataprotection@aster.co.uk)

**Call:** 01749 832118 or 01380 735327

**Write to:** Data Protection Officer, Risk & Compliance, Aster Group, 2<sup>nd</sup> Floor, Priory Medical Centre, Wells, Somerset, BA5 1XJ.

The Information Commissioner (ICO) can also advise you about your data protection rights. The ICO is an independent official body responsible for the Data Protection Act 2018. For more information, call 0303 123 1113 or [visit the ICO website](#).

If you need our ICO registration number, please see the list below:

| Entity            | Service area                | ICO Registration |
|-------------------|-----------------------------|------------------|
| Aster Group       | Corporate services          | Z9842654         |
| Aster Communities | Tenancies                   | Z2964186         |
| Aster Property    | Property maintenance        | Z9436053         |
| Aster Living      | Independent Living services | Z9435976         |
| Aster Homes       | Property sales              | Z2708504         |
| Synergy Housing   | Tenancies                   | Z2945053         |
| Aster 3 Limited   | Tenancies                   | ZA273995         |