

## **GDPR DATA Privacy Notice-Clients**

### **Introduction**

At Stevenage Haven, we are committed to protecting and respecting your privacy as our staff, suppliers and clients

This policy (together with any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The rules on processing of personal data are set out in the General Data Protection Regulations 2017 (the "GDPR").

### **1. Definitions**

**Data controller** - A controller determines the purposes and means of processing personal data.

**Data processor** - A processor is responsible for processing personal data on behalf of a controller.

**Data subject** – Natural person

#### **Categories of data: Personal data and special categories of personal data**

**Personal data** - The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

**Special categories personal data** - The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

**Processing** - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Third party** - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

### **2. Who are we?**

Stevenage Haven is the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are: Stevenage Haven, 6 Ditchmore Lane Stevenage, SG1 3LJ.

For all data matters contact the GDPR Lead at the above given address.

### 3. The purpose(s) of processing your personal data

We use your personal data for the following purposes:

### 4. The categories of personal data concerned

With reference to the categories of personal data described in the definitions section, we process the following categories of your data:

- Personal data [for example your National Insurance Number, housing history, offending history, date of birth, medical history, work and education details and benefit details.
- Special categories of data [for example data regarding your ethnic origin or race; political or philosophical beliefs; your health and details of any disability or long term ill-health]

We have obtained your personal data from you on receipt of a completed referral form from any of our referral partners. And processing commences immediately to establish if we are able to provide individuals with accommodation and support.

### 5. What is our legal basis for processing your personal data?

#### a) Personal data (article 6 of GDPR)

Our lawful basis for processing your general personal data:

<input checked="" type="checkbox"/> Consent of the data subject;	*INCLUDE A GDPR CONSENT FORM
<input checked="" type="checkbox"/> Processing necessary for the performance of housing related contract with the data subject or to take steps to enter into a contract	National Insurance Number, housing history, offending history, date of birth, medical history, work and education details and benefit details.
<input checked="" type="checkbox"/> Processing necessary for compliance with a legal obligation	Right to Reside Check; e.g. Passport/Birth Certificate, drivers licence.  Right to access benefits checks e.g Passport/Birth certificate, Letters from DWP. Proof of national Insurance  Driving Licences;
<input type="checkbox"/> Processing necessary to protect the vital interests of a data subject or another person	

<input type="checkbox"/> Processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller	
<input checked="" type="checkbox"/> Processing necessary for the purposes of the legitimate interests of the data controller or a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of the data subject	Application Form

### **b) Special categories of personal data (article 9 of GDPR)**

#### **Our lawful basis for processing your special categories of data:**

<input checked="" type="checkbox"/> Explicit consent of the data subject	[INCLUDE THE GDPR: PERSONAL DATA CONSENT FORM]  Data pertaining to your ethnic origin, race, marital status, philosophical or religious beliefs; trade union membership; your health; your sexual orientation; any criminal convictions or offences
<input checked="" type="checkbox"/> Processing necessary for carrying out obligations under housing related support	Support plans, needs and risk assessments, further checks with other referral agencies or third parties if necessary
<input checked="" type="checkbox"/> Processing necessary to protect the vital interests of a data subject or another individual where the data subject is physically or legally incapable of giving consent	Next of Kin details in the event of an Emergency; Safeguarding
<input type="checkbox"/> Processing carried out by a not-for-profit body with a political, philosophical, religious or trade union aim provided that the processing relates	

<p>only to members or former members (or those who have regular contact with it in connection with those purposes); and there is no disclosure to a third party without consent</p>	
<p><input type="checkbox"/> Processing relates to personal data manifestly made public by the data subject</p>	
<p><input type="checkbox"/> Processing necessary for the establishment, exercise or defence of legal claims or where courts are acting in their judicial capacity</p>	
<p><input type="checkbox"/> Processing necessary for reasons of substantial public interest on the basis of EU or Member State law</p>	
<p><input checked="" type="checkbox"/> Processing necessary for reasons of preventative or occupational medicine, for assessing the working capacity of an employee, medical diagnosis, the provision of health or social care or treatment or management of health or social care systems and services on the basis of EU or Member State law or a contract with a health professional</p>	<p>Sickness Records, GP reports; details of any disability and adjustments;</p>
<p><input type="checkbox"/> Processing necessary for the reasons of public interest in the area of public health</p>	
<p><input type="checkbox"/> Processing necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes</p>	

[\*TICK MORE THAN ONE BOX, IF MORE THAN ONE APPLIES BUT INDICATE WHICH PURPOSE IT REFERS TO..]

More information on lawful processing can be found on the [ICO website](#).

## **6. Sharing your personal data**

Your personal data will be treated as strictly confidential, and will be shared only with a third party when necessary.

## **7. How long do we keep your personal data?**

We keep your personal data for no longer than reasonably necessary. Please see our Data Retention Policy for more details.

## **8. Providing us with your personal data**

We require your personal data as it is a requirement necessary for us to enter into a housing related contract with you and for our legitimate business interests in supporting you while you reside with us.

## **9. Your rights and your personal data**

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- the right to withdraw your consent to the processing at any time, where consent was your lawful basis for processing the data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable i.e. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority
- **Transfer of Data Abroad**

STEVENAGE HAVEN DOES NOT TRANSFER PERSONAL DATA OUTSIDE THE EEU.

## **10. Automated Decision Making**

WE DO NOT USE ANY FORM OF AUTOMATED DECISION MAKING IN OUR BUSINESS

## **11. Further processing**

If we wish to use your personal data for a new purpose, not covered by our Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

## **12. How to make a complaint**

To exercise all relevant rights, queries or complaints please in the first instance contact our DATA Protection lead at Stevenage Haven, No 6 Ditchmore Lane, Stevenage, SG1 3LJ

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](https://ico.org.uk/global/contact-us/email/) on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.