

## HOUSING PARTNERS LIMITED (HPL) AND DATA PROTECTION

### ***Data protection***

It is a legal requirement for HPL to comply with Data Protection Legislation. It is also HPL's policy to ensure that every employee maintains the confidentiality of any personal data held by HPL in whatever form.

### ***Data protection principles***

HPL needs to keep certain information about employees, clients and contracts to enable us to undertake our contractual responsibilities. To comply with the law, information must be:

- collected and used fairly and appropriately, stored, transmitted and handled safely and not disclosed to any other person unlawfully;
- processed lawfully, accurately, fairly and in a transparent manner;
- adequate, relevant and limited to what is necessary and kept up to date;
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed;
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.

"Data Protection Legislation" means all applicable privacy and data protection legislation and regulations including the Privacy and Electronic Communications (EC Directive) Regulations 2003 (SI 2426/2003) (PECR), General Data Protection Regulations (GDPR), and all applicable laws and regulations relating to processing of personal data and privacy of electronic communications so far as they are still in force, including where applicable, the guidance and codes of practice issued by the Information Commissioner.

"GDPR" means the Regulation (EU) 2016/679 of the European Parliament and of the Council of the 27 April 2016 on the protection of natural persons with regards to the processing of personal data and on the free movement of such data as applicable as of 25 May 2018.

In light of GDPR, we have undertaken a full review of our data protection policies and procedures.

### **Roles:**

- We confirm that HPL acts as a data processor on your behalf.
- As you are the data controller we act on your instructions, and as agreed in our terms and conditions.

## Housing Partners Limited

### Our Details:

**Registered Address:** Teme House, Whittington Hall, Whittington Road, Worcester, WR5 2RY

**Company Registered Number:** 04667857

**VAT Number:** 834858294

**Contact Names:** Lesley Westwood, Head of Finance

**Contact Email:** [lesleywestwood@housingpartners.co.uk](mailto:lesleywestwood@housingpartners.co.uk)

**Insurance:** We confirm that we hold Employers & Public Liability & Professional Indemnity Insurance. We will confirm level of cover on request.

### Service Provided:

Provide a short description of the service provided

A solution for the recovery of former tenant debt – PayBack traces former tenants and presents an overview of their circumstances.

### 1. Our appointed Privacy Officer:

Jason Fudge, Compliance Manager

Email: [jasonfudge@housingpartners.co.uk](mailto:jasonfudge@housingpartners.co.uk)

Housing Partners,  
Teme House,  
Whittington Hall,  
Whittington Road,  
Worcester,  
WR5 2RY

### 2. Data Storage:

PayBack is securely hosted on the Microsoft Azure Cloud.

Microsoft Azure Cloud is the industry leader's solution for cloud-based architecture offering outstanding resiliency and high availability services with endless capabilities. Microsoft Azure meets a broad set of international and industry-specific compliance standards, such as ISO 27001, HIPAA, FedRAMP, SOC 1 and SOC 2, as well as country-specific standards, such as Australia IRAP, UK G-Cloud and Singapore MTCS. Rigorous third-party audits, such as by the British Standards Institute, verify Microsoft Azure's adherence to the strict security controls these standards mandate. Our cloud infrastructure utilises Microsoft data centres located in Dublin, Ireland (Primary) and Amsterdam, Netherlands (Secondary) for backup purposes.

### 3. Suppliers and Third Parties:

Our suppliers are: TransUnion who verify and append data related to former tenants. Our 3<sup>rd</sup> party security checks have identified that TransUnion are UK based.

### 4. Housing Partners Data Retention:

In order to undertake our role as a data processor:

- HPL processes the Personal Data for as long as the Contract is in place with the Customer
- Data relating to former tenants is retained for 12 months from the date that HPL returns the first dataset to the customer. After this date HPL may delete or anonymise this data for statistical purposes

### 5. Access to Data:

With any exceptions noted in Section 3, access to your data is restricted to Housing Partners staff. Access is controlled by our IT team and accounts are password protected.

### 6. Training:

All Housing Partners' staff have received training on GDPR in 2018, and they have all undertaken a test to confirm their understanding of GDPR.

All Housing Partners' staff receive information security training as part of their induction process upon joining the organisation and all staff receive refresher training every 12 months.

### 7. Data Security:

Housing Partners Ltd are ISO27001:2013 certified. Certificate number: 561436

Housing Partners also regularly participate in Penetration Testing (Pen Test) conducted by third party PEN testers to check solutions for vulnerabilities.

### 8. Data Breach Procedures:

We will contact you without undue delay, in the event that we reasonably believe that there has been a personal data breach in respect of personal data.