

HOUSING PARTNERS CRM PRIVACY POLICY

1. Introduction

Housing Partners Limited are committed to protecting and respecting your privacy.

This privacy policy explains when and why we collect personal information, how we use it, the conditions under which we may disclose it to others and how we keep it secure. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. For the purpose of the General Data Protection Regulation (**GDPR**) and other UK data protection laws (**Data Protection Laws**) that apply from time to time, the data controller is Housing Partners Limited of Whittington Hall, Whittington Road, Worcester, Worcestershire WR5 2ZX (company number 04667857).

2. When do we collect and process personal data about you?

- You may give us information about you when communicating with us by any means with our sales team or other representative of Housing Partners.
- You may give us information about you by filling in forms on our site, by registering with us or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our site, subscribe to our service, search for a product and when you report a problem with our site and/or products or services.
- We may collect personal data if it is considered to be of legitimate interest, and if this interest is not overridden by your privacy interests. Before data is collected we make sure an assessment is made, ensuring that there is an established mutual interest between you and Housing Partners.

3. Why do we collect and use personal data?

- We may collect and use personal data information held about you to contact you about our products and services that maybe of interest to you
- We may collect and use personal data because it is necessary to manage your account and contract with us
- We may collect and use personal data because you have requested more information about a product or service that we offer
- We may collect and use personal data to investigate a problem with a product or service that you have notified us of

4. Our legal basis for collecting personal data

Collecting personal data based on consent

Some of the personal information we process is provided to us directly by you because you have made an enquiry or information request to us.

Collecting personal data based on legitimate interest

We may use personal data if it is considered to be of legitimate interest, and if the privacy interests of the data subjects do not override this interest. Normally, to establish the legal basis for data collection, an assessment has been made during which a mutual interest between Housing Partners and the individual person has been identified. This legal basis is primarily related to our sales and marketing purposes, and we may send information on products and services to our customers based on legitimate interest. We will always inform individuals about their privacy rights and the purpose for collecting personal data.

Collecting personal data based on contractual necessity

We use personal information for fulfilling our obligations related to contracts and agreements with customers and suppliers.

5. What type of personal data is collected

The information that we process may include:

- name
- title
- e-mail address
- job title
- employer/organisation
- telephone number

6. Disclosure of your information

We will not share your information with any third parties for the purposes of direct marketing.

We may share your personal data with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We may transfer or share your personal data with third parties that process your personal data in a country outside the European Economic Area (EEA) but we will only do so if:

- We have a data transfer agreement in place with the third party containing the standard data protection clauses as required by the Data Protection Laws;
- The relevant country is subject to a current adequacy decision; and/or
- The third party is based in the United States and has a valid Privacy Shield (as Privacy shield may be replaced or amended from time to time) certification in place.

We may disclose your personal information to third parties:

- For our Legitimate Interests, in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- For our Legitimate Interests, if Housing Partners Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- Either for our Legitimate Interests or if the sharing is necessary for compliance with a legal obligation to which we are subject:
 - if we are under a duty to disclose (including, without limitation, to local authorities, police or other statutory bodies) or share your personal data;
 - in order to enforce or apply our terms of use or terms and conditions of supply and other agreements;
 - to protect the rights, property, or safety of us, our customers, or others;
 - for the purposes of fraud protection and credit risk reduction.

7. Where and how we store your personal data

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access, including those set out below.

- Our security procedures include those relating to storage, access and disclosure of your personal data.
- We use data processors who are third parties who provide elements of services for us. We have contracts in place with our data processors. This means that they

cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

8. Your rights

You have a number of rights relating to your personal data pursuant to the Data Protection Laws including:

- The right to rectification or erasure of your personal data;
- The right to restrict or object to certain processing of your personal data;
- The right to portability of your personal data;
- The right to request appropriate copies (which may contain redactions) of any data transfer clauses or certification mechanisms that allow the transfer of your personal data outside of the European Economic Area;
- Where we are relying on your consent to process your personal data, the right to withdraw consent at any time;
- The right to lodge a complaint with the Information Commissioner's Office in the UK or other applicable supervisory authority;
- The right to ask for a copy of your personal data.

9. Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

10. Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to: The Data Protection Officer, Housing Partners Limited of Whittington Hall, Whittington Road, Worcester, Worcestershire, WR5 2ZX.