

HOUSING PARTNERS PRIVACY POLICY

1. INTRODUCTION

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

This privacy policy 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. By visiting www.housingjigsaw.co.uk and/or making use of our products/services you are accepting and consenting to the practices described in this privacy policy.

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. INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

- **Information You Give Us.** 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. The information you give us may include your name, gender, date of birth, address, e-mail address, postal address and phone number, and other personal data that you provide us.
- **Information We Collect About You From You.** We may also collect, the following information:
 - technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
 - information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service team.
- **Aggregated Data and Statistics.** We may use aggregate data and statistics for the purpose of monitoring the site usage in order to help us develop the site and

our services. We may provide such aggregated data to third parties for advertising or other purposes. The statistics will not include information that can be used to identify any individual.

3. USES MADE OF THE INFORMATION

We use information held about you in the following ways and on the associated lawful grounds for processing as set out below. The lawful grounds that we utilise are:

1. Our processing is necessary for the performance of a contract to which you are subject or in order to take steps at your request prior to entering into that contract (**Performance of Contract**)
2. Our processing is necessary for the purposes of our legitimate interests or those of a third party, except where such interests are overridden by your interests or fundamental rights and freedoms (**Legitimate Interests**)

Information You Give Us

Purpose	Ground for Processing
To manage your account and contract with us	Performance of Contract
To carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us	Performance of Contract
To notify you about changes to our products and services	Legitimate Interests
To ensure that content from our site is presented in the most effective manner for you and for your computer	Legitimate Interests

Information We Collect About You From You

Purpose	Ground for Processing
To administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes	Legitimate Interests
To improve our site to ensure that content is presented in the most effective manner for you and for your computer	Legitimate Interests
To allow you to participate in interactive features of our service, when you choose to do so	Performance of Contract and/or Legitimate Interests
As part of our efforts to keep our site safe and secure	Legitimate Interests
To provide you and third parties with our products and services	Performance of Contract and/or Legitimate Interests

4. COOKIES

Our site uses cookies to distinguish you from other users of our site. This helps us to provide you with a good experience when you browse our site and also allows us to improve our site.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our site. They include, for example, cookies that enable you to log into secure areas of our site.
- **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our site when they are using it. This helps us to improve the way our site works, for example, by ensuring that users are finding what they are looking for easily.

- **Functionality cookies.** These are used to recognise you when you return to our site. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

For more information about cookies, including how to change your browser settings and find and delete cookies on your hard drive, please visit www.aboutcookies.org.

To opt-out of being tracked by Google Analytics across all websites visit <https://tools.google.com/dlpage/gaoptout>

5. DISCLOSURE OF YOUR INFORMATION

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 share your personal data with selected third parties (on the basis of Performance of Contract or Legitimate Interest, unless the personal data is sensitive or special category, in which case on the basis of Public Health) including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you, including housing associations, councils, landlords and any other third parties that we consider may be able to assist you in finding housing opportunities.
- Analytics and search engine providers that assist us in the improvement and optimisation of our site.

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.

6. 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. If you are a registrant of our services your identity shall be confirmed by reference to unique information such as a user name and password. The user name and password shall enable you to use the services. It is your responsibility to keep your user name and password confidential.
- All personal data you provide to us is stored on our secure servers and we take all reasonable steps to ensure, and require all third parties to whom your personal data is disclosed, to treat your personal information as fully confidential and to fully comply with the Act. We will keep your personal data only for so long as is necessary for Housing Partners to process your personal data for the purposes and legitimate interests set out above.

7. 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.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

8. 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.

9. 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.