

# Housing Partners Ltd

Data Processing Annex

## Data Processing Annex

### 1. Nature and purpose of the Processing

HPL processes the Personal Data in order to provide the Services to the Customer that enables customers to record incidents of tenancy breach, anti-social behaviour or domestic abuse, and offer support to safeguard victims and discourage repeat offences. Thereafter, HPL processes the Personal Data to store in line with HPL back up policy. Recovery in the event of data loss in line with HPL disaster recovery process.

### 2. Duration of Processing

HPL processes the Personal Data for as long as the Contract is in place with the Customer and as determined by clause 14.4 of the Terms. Thereafter, HPL processes the Personal Data in accordance with data retention policy.

Data is retained for 7 years from tenancy end date. However, after this date HPL may anonymise this data for statistical purposes.

### 3. Types of Personal Data

HPL processes the following types of personal data:

- Name
- Address
- Contact information
- Medical
- Behavioural
- Religious beliefs
- Criminal activity
- Sexual behaviour
- Sexual preference
- Ethnicity
- Family information

### 4. Categories of Data Subjects

- Victims
- Alleged perpetrators
- Witnesses including children
- Users of Streetwise

### 5. Sub-Processors

<b><u>Sub-Processor</u></b>	<b><u>Data Shared</u></b>	<b><u>Purpose of Data Sharing</u></b>
Microsoft Azure	Full dataset	The data is securely hosted on the

		Azure cloud, as such, this data is not 'shared with Microsoft Azure' as it is protected and only visible to us.
Scanii	Attachments uploaded to Streetwise	Scanii provides real time virus scanning for documents uploaded by end users. Data is only in their servers for the extent of time necessary to process and fingerprint it (usually milliseconds), after that they store metadata about the content to help them improve the overall engine accuracy
Salesforce	End user names and contact details	Help desk/customer service software solution. Hosted in the EU.
Solvous Marketing Limited	Customer contact details	Solvous Marketing Limited distribute Housing Partners' product related material such as newsletters, product updates, features and enhancements.  Solvous do not market non-Housing Partners products to customers and do not pass customer contact details on to any other parties.  No data is stored by Solvovs on their infrastructure.
Mailchimp	Name and email address and email contents	MailChimp provides a bulk email marketing solution.  Data is hosed within the USA. MailChimp participates in and has certified its compliance with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework.  MailChimp complies with the Privacy Shield Principles for all onward transfers of Personal Information from the EEA, United Kingdom, and Switzerland.