Customer Privacy Notice

'Customer' means anyone who receives a service (such as renting a home or other property) from Curo.

Curo Group and its associated companies ('Curo') is a housing association and house-builder based in Bath providing homes and high quality care and support services across the West of England. Curo is committed to respecting your right to privacy and to processing your personal information in a lawful, fair and transparent way. As a Data Controller, all personal data we hold about you will be processed in strict accordance with UK data protection laws. Specifically, this means we comply with the UK General Data Protection Regulations ('UK GDPR') and the Data Protection Act 2018 ('DPA 2018')

The following summarises:

- How we use personal data
- What personal data we need
- Why we need it
- How we use it
- Who we might share it with, and
- How long we will keep it for

It also sets out the rights you have regarding any of the personal data held by Curo. From time to time we may update this Notice. Any updates will be posted on our website. Where changes materially affect how we process your personal data or your rights, we will notify you appropriately.

What is personal data?

Personal data is any information relating directly or indirectly to a living individual. This information includes things such as a name, an identification number, location data, online identifier or factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.

What personal data do we process?

We only collect personal data for specific, clear and legitimate purposes and we will not process it for purposes that differ from those we have notified you about. We will limit our use of your personal data to what is needed, relevant to, and necessary for the purposes we have identified. Access to your personal data is given only to those who need to process it for the purposes identified. We will ensure that we keep your personal data accurate and up to date, and will not store it for longer than is necessary.

The types of personal data we collect includes (but are not limited to):

Name, address, phone number(s), email address(es), other identifiers (for example

social media user names), financial, medical/health, behavioural, criminal offence/conviction, religious beliefs, trades union membership or political opinions, images, CCTV, audio recordings, location data, disability information, copies of ID information for example your national insurance number to verify your identity and support benefit processes, profiling information and other information such as your next of kin.

We collect this information in a number of ways, including (but not limited to):

- Information we collect directly from you, for example when you:
    - interact with our website and social media platforms
    - become a customer
    - access your account online
    - call our customer contact department
    - make an enquiry
    - book a repair
    - participate in surveys
    - attend meetings with us
    - purchase services or products from us
    - raise a complaint or request
    - participate in our events
    - attend our business premises covered by CCTV

- We also collect information from third party sources, for example, credit referencing agencies, landlord and other references, data analysis companies and local authorities.

<u>Why do we process personal data?</u>

Our processing of your personal data is necessary for us to provide services to you, maintain our relationship with you and to fulfil our legal obligations. We use personal data for the following reasons:

- **Finding you a suitable home**
- **Managing your property and delivering home improvements**
- **Managing tenancies and compliance**
- **Providing community services**
- **Health, safety and wellbeing**
- **Managing enquiries**
- **Managing your accounts**
- **Selling properties or shares in properties**
- **Supporting you in your home**
- **Managing our suppliers and contractors**
- **Improving customer experience**
- **The management and governance of our businesses**
- **Fulfilling our legal obligations**
- **Supporting you to build a credit history**

How do we process your personal data?

The UK GDPR gives companies a number of lawful reasons to collect and process personal data. Below are the lawful reasons we rely upon and the types of processing activities that relate to each:

Performance of a Contract: In some circumstances it is necessary to process your personal data in order to fulfil our contractual obligations with you. Without this information we would not be able to provide a service to you. For example:

- Setting up and administering leasehold, shared owner and freehold accounts
- Pursuing overdue payments
- Managing and delivering repairs
- Issuing notices
- Administering customer accounts
- Making payments to customers and suppliers
- Tenancy compliance and management
- Administering resident involvement groups
- Administering grants
- Managing tenancies and Estates queries
- Property sales
- Delivering services to support independent living
- Creating and administering tenancy agreements and lettings
- Trade enquiries and requests and managing subcontractors/suppliers
- Administering abandoned goods

Legal Obligation:

In some circumstances it is necessary to process your personal data so we can comply with our legal obligations. Without this information we would not be able to fulfil our legal obligations to you, the authorities, or regulatory and statutory bodies. For example:

- Service of notices in connection with residential and commercial property management
- Supplier/subcontractor compliance
- Preparation of legal matters
- Administering public liability claims
- Sharing benefit payment information with the relevant authority
- Risk and assurance, including fraud monitoring and investigation
- Tenancy/lettings management and administration, for example processing ID for Right to Rent and Direct Lets, and processing documentation for signature
- Home Safety compliance and complaint resolution
- Providing support to and protection of customers, for example administering safeguarding procedures
- Sharing information with local authorities, such as electoral register

Legitimate Interest:

There are situations where processing your personal data is necessary to pursue our legitimate interests as a business and responsible landlord, or your legitimate interests as an individual.. In doing so, we have to balance our interests as a business with yours as an individual, so that our legitimate interests do not override your interests, rights or freedoms.
For example:

- Planning and delivering home improvements
- Delivering health and safety standards
- Contacting your nominated Urgent Contact where we cannot reach you and there is a risk to your health, safety or property
- Conducting surveys and reports including customer feedback surveys and quality assurance
- Managing our properties and tenancies
- Administering customer accounts and properties
- Providing customer support, for example texting customers about rent statements and referring to other agencies
- Receiving and recording enquiries from the public, customers and suppliers and administration
- Recording calls for monitoring, training, complaint and auditing purposes
- Recording images via CCTV or other photographic means and noise monitoring for security and investigation purposes
- Carrying out audits, quality assurance and maintaining databases
- Investigating, monitoring and reporting issues and reportable events
- Managing complaints and enquiries
- Lettings management, for example administration of credit checks and referencing
- Tendering and procurement processes
- Supporting tenants to build a credit history through the Rental Exchange programme with Experian
- Administering applications for Curo grants
- Housebuilding project work
- Supplier and subcontractor checks and administration
- Carrying out and administering suitability assessments and reports in relation to the Independent Living Service
- Generating records in the course of carrying out our business activities, including notes, meeting minutes and associated documentation, general correspondence
- Organising, planning and administering events, including generic publicity material
- Processing details of properties and tenants on Curo's ICT systems
- Customer segmentation analysis
- Sending customers and stakeholders information about Curo services via email, text, social media and letter
- Providing customers with translations and interpretations
- Management of resident involvement groups
- Risk assessment and social value monitoring
- Case management
- Risk flag management
- Business continuity and emergency
- Progressing open market sales
- Analysing traffic to our website
- To facilitate colleague training and improvement
- Graduate schemes and scholarships

Recognised Legitimate Interests:

This lawful basis allows us to process certain personal data without needing to do a separate balancing test where the law has already identified that the processing is necessary for important reasons. Examples of this are preventing fraud, safeguarding individuals and keeping our services secure.

Consent:

In some situations, we will ask you for your consent to collect and process your personal data, for example:

- When you interact with us via our website and social media, for example Twitter and Livechat
- Through cookies when interacting with our website
- Attending events
- Contact information when purchasing a home from us or making an expression of interest in our properties
- Administering our Working Well and Employability schemes
- Parolee resettlement
- Requests from customers
- Taking photographs for publicity
- Customer support in connection with tenancy compliance
- Recording third party permissions

Vital Interests:

Occasionally, we may need to process your personal data when it is necessary to protect your life, for example, in an emergency situation where you cannot give consent.

Special category data

Sometimes, we will need to process more sensitive personal data, known as 'Special Category' data. This type of information includes personal data about your race, ethnic origin, political opinions, religious beliefs, trade union memberships, biometrics, health/medical information and sexual orientation. We use special category data to better understand your needs, provide a better service and to comply with our legal and statutory duties for example under health and safety, social protection and/or equality legislation, for example, to make reasonable adjustments and to ensure our services are accessible. When we collect and process (including sharing) this data we will rely on one of the following additional purposes to process it:

- **Explicit consent;**
- **Employment, social security and social protection law;**
- **Already made public by you;**
- **Legal claims;**
- **Substantial public interest purposes (for example equality of opportunity, safeguarding and prevention of crime).**
- **Health or Social Care law**

Sometimes it will be necessary to process personal information relating to criminal prosecutions, proceedings, sentencing or convictions. In those circumstances we will rely on one of the following additional grounds to process (including sharing) this personal data:

- **Consent;**
- **Employment, social security and social protection law;**
- **Protecting vital interests;**
- **Already made public by you;**
- **Legal claims;**
- **Judicial acts;**
- **Preventing or detecting unlawful acts or**
- **Health or Social Care purposes**

Who we share your personal data with

In order to provide you with a service and to fulfil our business objectives and legal obligations, there are many situations where it is necessary to share your personal data with third parties. In such circumstances we will share your data with the following categories of organisations/individuals:

- Regulatory requirements, legal and compliance, such as the Department for Work and Pensions, NHS, legal representatives, auditors
- Suppliers and contractors such as mortgage advisors, trades and sites, Sirona, subcontractors, trades or organisations tendering for work, All Pay, MailChimp
- Referencing and credit checking companies. This includes our partner Valid8 IP for the provision of a soft credit search and identity information sourced from e.g. TransUnion, Equifax, or Experian with no impact on your credit score
- Utilities companies
- Other housing associations (including for ASB, safeguarding, crime prevention and NOSP).
- Platforms for electronic signature of documents, such as SignRequest
- CCTV, security and safety device providers
- Local authorities, police, our external partners, social services, contract funders and support agencies, such as HCRG Care Group, to fulfil our contractual or legal obligations
- Independent research companies, for instance carrying out Tenant Satisfaction Measures (TSMs) surveys on our behalf, such as Acuity.
- ICT service providers and software companies, such as Microsoft, Survey Monkey, Eventbrite and hosted and in-house providers including MyCuro and Voicebox, and Google
- Other colleagues, departments and companies within Curo Group

We will only ever share information that is necessary and proportionate to fulfil a specific, lawful purpose.

Security and sharing your personal data outside the UK and European Economic Area (EEA)

We ensure that appropriate security measures are in place when handling your personal data. Occasionally, we may share your data with third party suppliers outside the UK and the EEA, for example we use Survey Monkey which has servers in the USA. In such circumstances, we ensure that your personal data will receive the same protection as if it were being shared within the UK and EEA by ensuring that our contracts contain a requirement for suppliers to adhere to the same strict data privacy requirements as us.

Profiling and Automated Decision-making

Sometimes we use personal data (including personal data obtained from third-party data gathering organisations) to help us generate customer profiles based on lifestyle and behaviours. We use this information to deliver a more customised customer experience and ensure services are delivered appropriately. We may also use automated tools, including AI-assisted systems, to support decision-making and improve our services. Your rights in relation to automated decisions are explained below.

How long will we keep your personal data?

We will only keep your personal data for as long as necessary and for the purpose for which it was collected. When it is no longer necessary to keep your personal data we will delete it. Our policy for deciding how long we keep personal data is based on National Housing Federation best practice guidance and our legal obligations.

Examples:

- When we obtain your bank details to make a refund we will destroy the personal data once the refund has been processed
- Personal data collected from credit checks is kept until the start of a tenancy or acceptance of it
- Tenancy agreements will be retained for six years after the end of the tenancy to comply with our legal obligations and industry guidance.

Sometimes, we may need to retain data for analytical, statistical or research purposes. In these circumstances we will anonymise or pseudonymise your personal data so you will not identifiable.

Your data rights

You have the following rights over the personal data we hold about you:

- **Access** – to ask for a copy of the personal data we hold about you (Subject Access Request or 'SAR').
- **Correction** – to ask us to correct inaccurate or incomplete information.
- **Deletion** – to ask us to delete your personal data, in certain circumstances.
- **Restriction** – to ask us to limit how we use your data, in certain circumstances.
- **Objection** – to object to how we use your data, where we rely on legitimate interests as our lawful reason for processing.
- **Portability** – to ask for a copy of your data in a portable format, where this right applies.
- **Automated decisions** – if a decision is made solely by automated means and has legal or similarly significant effects on you, you have the right to ask for a person to review the decision, to express your view and challenge the decision.

When you contact us to exercise any of these rights, we will respond within one calendar month. If your request is complex, we may extend this by up to two additional months. If this is the case, we will write to you and explain why we need more time. In some cases, the law allows us to refuse a request — for example, if it is clearly unfounded or excessive. If we do refuse, we will explain our reasons and tell you how you can challenge the decision with us or raise your concerns with the Information Commission (contact details below).

The right to withdraw your consent:

Where you have given **consent** for us to process your personal data, you have the right to withdraw your consent at any time. Please contact us at the email or phone number below.

Direct Marketing

You have the right to object to us processing your personal data for direct marketing purposes. If you would like to stop receiving our marketing communications, please contact us at the email or phone number below.

Checking Identity

In order to protect confidentiality we will ask you to verify your identity before responding to any request made under this privacy notice. If a third party makes a request on your behalf, we require proof that you have given your permission for them to act on your behalf.

Contact Details for Further Information

The Curo Group incorporates the following two companies and four charitable registered societies in England and Wales. Each company and society is a Data Controller:

- Curo Enterprise Limited (ICO No. ZA223885)
- Curo Market Rented Services Limited

(ZA236884) Four charitable registered societies:

- Curo Group (Albion) Limited (ICO No. Z659867X)
- Curo Places Limited (ICO No. Z6598589)
- Curo Choice Limited (ICO No. Z6627936)
- Mulberry Park Community Benefit Society (ICO ZA461268)

The registered office for all organisations in the Group is: The Maltings, River Place, Lower Bristol Road, Bath BA2 1EP.

If you have any queries or questions about the data we hold about you, please contact our Data Protection Officer at privacy@curo-group.co.uk or phone 01225 366000.

Data Protection Complaints

If you have concerns about how we process your personal data, please contact us first so we can investigate and respond. You can find further details about how to complain **here** on our website.

If you remain dissatisfied after we have completed our internal process, you can escalate your complaint to the Data Protection Regulator, the Information Commission (ICO). Further details about how to complain to the ICO and about your data protection rights more generally can be found on the ICO website here: https://ico.org.uk/ or by telephoning 0303 123 1113.