

**Privacy Notice for Clients**

**Who are we?**

Housing Matters (Bristol)

Easton Business Centre, Felix Road, Easton, Bristol, BS5 0HE (Postal address only)

Advice Line: 0117 9351260

Charity Number: 1180341

Company Number: 10675390

We are registered on the Information Commissioner's Office Register; registration number ZA442269 and act as the Data Controller when processing your data.

Our designated Data Protection Officer is Alice Tibbert who can be contacted at director@housingmatters.org.uk

This Privacy Notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

**Information That We Collect**

Housing Matters (Bristol) collect and use your personal information to give you advice and support, improve our services and tackle wider issues in society that affect people's lives.

We only ask for the information we need. We always let you decide what you're comfortable telling us, explain why we need it and treat it as confidential.

We handle and store your personal information in line with data protection laws. We log all your information, correspondence, and notes into our secure case management system. Some of your information might also be kept within our secure email and IT systems.

We'll only ask for information that's relevant to your problem. Depending on what you require help with, this might include:

* Name and contact details so we can keep in touch with you about your support
* Date of Birth
* Equalities Data - information like your gender, ethnicity or sexual orientation
* Health/Medical information (where relevant)
* Next of Kin (where relevant)
* Children’s Details (where relevant)
* Personal information - for example about family, work, or financial circumstances
* National Insurance Number or Passport (where relevant)
* Personal information about other people involved in your case or enquiry
* Details of other professional involved in your case or enquiry

If you don't want to give us certain information, you may not have to. For example, with equalities data we will always give the option of “prefer not to say”.

**How We Use Your Personal Data**

Housing Matters (Bristol) take your privacy very seriously and we will never disclose or share your data without your consent; unless required to do so by law. We only retain your data for as long as is necessary and for the purpose(s) specified in this notice.

We will always process your personal data in a way that is lawful and fair. We will not process the data in a way that is unduly detrimental, unexpected or misleading.

The legal basis for processing your personal data is detailed below:

* Legitimate Interest – we may collect information about you so we can help you with your case or enquiry, or your support needs.
* Consent – we will use this where we can offer you a choice as to whether or not we collect, store, share or otherwise process your information. This will be made clear to you and will not be done unless we have your consent.
* (Substantial) Public Interest – where we are working to assist with public law or social policy we will collect your information under public interest. We will be clear about why we have to collect this information, how it will be used, who you can expect it to be shared with and why.
* Legal obligation – where we need to comply with a legal obligation, such as for our insurance.

Where we rely on Legitimate Interest, we have carried out a thorough Legitimate Interests’ Assessment (LIA) to ensure that we have weighed your interests and any risk posed to you against our own interests; ensuring that they are proportionate and appropriate.

**Special Categories Data**

We sometimes need to process sensitive personal information (*known as special category data*) about you, to ensure we are providing our services to a wide range of people (equalities data) or health/medical information about you that is important for us to know to help to support you.

We will only ever process special category data where one or more of the following apply: -

* The data subject has given explicit consent to the processing of the personal data. We will always ensure clients have the option to decline sharing sensitive data.
* Processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent.
* Processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.
* Processing is necessary for reasons of substantial public interest.

**Sharing and Disclosing Your Personal Information**

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement. This could include situations where we have to use or share your information:

* to comply with the law – for example, a safeguarding issue or if a court orders us to share information. This is called ‘legal obligation’.
* to protect someone’s life – for example, sharing information with a paramedic if a client was unwell at our office. This is called ‘vital interests’.
* to carry out our legitimate aims and goals as a charity – for example, to create statistics for our national research. This is called ‘legitimate interests’.
* for us to carry out a task where we’re meeting the aims of a public body in the public interest – for example, delivering a government or local authority service. This is called ‘public task’.
* to defend our legal rights – for example, sharing information with our legal advisors if there was a complaint that we gave the wrong advice.

If we use a third party to provide services and business functions; we will ensure all data processors acting on our behalf only process your information in accordance with instructions from us and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures.

**Your Rights**

You have the right to access any personal information that Housing Matters (Bristol) processes about you and to request information about:

* What personal data we hold about you
* The purposes of the processing
* The categories of personal data concerned
* The recipients to whom the personal data has/will be disclosed
* How long we intend to store your personal data for
* If we did not collect the data directly from you, information about the source

**Access:** You can request a copy or some or all of the information we hold about you. We will aim to get all the required information to you within one calendar month, unless there are complicated circumstances, in which case, we will explain what they are within one month and provide you with an idea of what you can expect, up to a maximum of a further two months. We will not charge for supplying you with this information.

**Rectification**: If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible, within one calendar month; unless there is a valid reason for not doing so, at which point you will be notified.

**Erasure:** You have the right to request erasure of some or all of your personal data in accordance with the data protection laws. If we cannot fulfil this request, we will let you know the reason within one calendar month. There may be reasons why we cannot erase your data. This may be to ensure we comply with our legal obligations or our insurer’s requirements, or in case we need to review the work we did for you.

**Portability:** Where applicable, you have the right to data portability of your information from one IT environment to another in a safe and secure way.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

**Security Measures**

Housing Matters (Bristol) takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, including password security, encryptions, restricted access, IT authentication, firewalls and anti-virus/malware.

Staff who access your data have had data protection training to make sure your information is handled sensitively and securely.

**Transfers Outside the EU**

Personal data in the European Union is protected by the General Data Protection Regulation (GDPR) but some other countries may not necessarily have the same high standard of protection for your personal data. Housing Matters (Bristol) does not transfer or store any personal data outside the EU.

**How Long We Keep Your Data**

Housing Matters (Bristol) only ever retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations.

We will normally keep all of the information for 7 years from when our work comes to an end. This is to comply with our legal obligations and our insurer’s requirements, and in case we need to review the work we did for you. After that time, it will be securely destroyed unless we have a legitimate reason to keep it.

A copy of our Data Retention and Erasure Policy is available on request.

**Visitors to our website**

When you visit our website [www.housingmatters](http://www.housingmatters).org.uk we use a third party service i.e. Google Analytics, to collect standard internet log information and details of visitor behaviour patterns.

We do this to track interest on specific pages, see how the site is being used and look at how we can make improvements to the site. The information is only processed in a way that does not identify anyone.

We do not make, and do not allow our providers to make, any attempts to find out the identities of those visiting the website. If we do ever try and link our cookies and tracking information, we will be up front about it, explaining why and what we intend to do with it.

**Cookie Notice**

A ***‘cookie’*** is a small piece of data sent from a website and stored on the user’s computer by the user’s web browser while the user is browsing. When you visit a site that uses cookies for the first time, a cookie is downloaded onto your computer/mobile device so that the next time you visit that site, your device will remember useful information such as items added in the shopping cart, visited pages or logging in options.

Cookies are widely used in order to make websites work, or to work more efficiently, and our site relies on cookies to optimise user experience and for features and services to function properly.

Most web browsers allow some control to restrict or block cookies through the browser settings, however if you disable cookies you may find this affects your ability to use certain parts of our website or services. For more information about cookies visit: <https://www.aboutcookies.org>.

**Lodging A Complaint**

Housing Matters (Bristol) only processes your personal information in compliance with this Privacy Notice and in accordance with the relevant data protection laws.

If, however, you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to complain to the Data Protection Officer.

If you are not satisfied with how your complaint has been dealt with, you have the right to lodge a complaint to the supervisory authority: Information Commissioners Office<https://ico.org.uk/>