

# Customers & Third Parties: Privacy Notice



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# 1 Introduction

1. Jigsaw Homes Group Limited recognises the importance of respecting your personal privacy and the need to have in place appropriate safeguards surrounding the processing of personal data. Carrying out our role as landlord, service provider and employer requires us to collect, store and use personal data about a range of data subjects; including tenants, residents, employees, partners and other third parties.
2. As a company who has access to and controls your personal data (a 'Data Controller') we are required to provide you with certain information about how we collect, store, destroy and otherwise process your personal data. We have in place, and will continue to develop, measures that promote strong privacy and security of that personal data, so that:
  - Your privacy rights are understood and upheld.
  - The risk of identity related crime is diminished.
  - The Group earns and retains a reputation for trustworthiness and transparency.
  - The requirements of data legislation on 'data controllers' are complied with.
3. In doing so, we have developed a range of internal policies and processes which ensure robust data protection arrangements are in place to protect your personal data. We also undertake regular monitoring and reporting, provide regular training to all our employees and are registered with the Information Commissioner's Office ('ICO').
4. In addition:
  - We are committed to safeguarding the privacy of our website visitors. For more details on how we treat information that we gather about your activities on our websites please view our [Web Privacy Policy here](https://www.jigsawhomes.org.uk/information-article/website-privacy-policy/). <https://www.jigsawhomes.org.uk/information-article/website-privacy-policy/>
  - We use closed circuit television (CCTV). For more details please view our [CCTV Policy here](https://www.jigsawhomes.org.uk/information-article/cctv-policy/). <https://www.jigsawhomes.org.uk/information-article/cctv-policy/>
  - We collect data on behalf of CORE. For more details, please [view their privacy notice here](https://www.jigsawhomes.org.uk/wp-content/uploads/2018/10/core-data-sharing-a). <https://www.jigsawhomes.org.uk/wp-content/uploads/2018/10/core-data-sharing-a>

## 2 Who Is the Data Controller and What Are Their Contact Details?

5. The Data Controller is the company that decides the purpose for and the way in which any personal data is processed. Jigsaw Homes Group Limited and some of its subsidiaries are data controllers registered with the Information Commissioner's Office ('ICO'):

- Jigsaw Homes Group Limited. ICO registration number: Z832622X. Registered as a Community Benefit Society with FCA. Registration number: 29433R. Housing Regulator registration number: LH4345
6. Jigsaw Homes Midlands. ICO registration number: Z1599688. Registered as a Community Benefit Society with FCA. Registration number: 8378. Housing Regulator registration number: L4532
  7. Jigsaw Homes North. ICO registration number: Z1657414. Registered as a Community Benefit Society with FCA. Registration number: 16668R. Housing Regulator registration number: LH0131
  8. Jigsaw Homes Tameside. ICO registration number: Z1599674. Company number 3807022. Charity Commission number 1146435. Housing Regulator registration number: LH4266
  9. Jigsaw Support . ICO registration number: Z6749053. Registered as a Community Benefit Society with FCA. Registration number: **8241**.
  10. The registered office address for the above companies is Cavendish 249, Cavendish Street, Ashton-under-Lyne, OL6 7AT

In most cases the Data Controller will be the landlord responsible for your personal data as a tenant or the company who you are in receipt of any other services from. If you are in any doubt as to who your Data Controller is please get in touch with our Data Protection Officer (DPO).

### **3 Who Is Your Data Protection Officer?**

11. The DPO for the Jigsaw Group is contactable via email on [dpo@jigsawhomes.org.uk](mailto:dpo@jigsawhomes.org.uk) and in writing to our Head Office Cavendish 249, Cavendish Street, Ashton-under-Lyne, OL6 7AT or by telephone on 0300 111 1133.

### **4 What Information Do You Collect About Me and How Do You Collect It?**

12. We collect and hold personal information about customers who wish to, currently or previously either lived in one of our properties or accessed our support services. This includes members of these customers' family and people associated with them, along with visitors to our website and our offices, and anyone who makes a complaint or enquiry to any of the Jigsaw Homes Group companies.
13. Members of the Jigsaw Homes Group may share with other members of the Group personal information that they collect about you.
14. We hold personal data such as your household's names, dates of birth, contact details and records of any transactions such as payments or requests for information as well as sensitive personal data such as income information, gender, ethnicity, religion

or other beliefs, sexual orientation and medical history. We may collect information about you or any of your household members in a variety of ways including (this list is not exhaustive) when:

- we receive a nomination from a local authority or referring partner;
- you complete various forms and contracts (such as application forms, tenancy agreements, employment support programmes, etc.);
- you apply to become a customer; we obtain information to determine your housing or support needs and in order to help us assess your application we may take up references from other housing providers/private landlords, your mortgage lender (if you own/have owned your own home), statutory agencies, local authorities, medical practitioners and third party agencies;
- you become a customer; for example if we were offered a tenancy we would require details of your household income, employment status, any welfare benefit entitlements and bank details.
- you request any of our services;
- you apply for one of our home ownership products;
- you voluntarily complete our customer surveys;
- you provide feedback or make a complaint;
- our officer/agents/contractors attend appointments with you;
- you contact us or use our services and we note any action taken, for example logging repairs, so that we have a record of what happened;
- we engage in other aspects of routine contact with you;
- we work with support agencies and third parties which relate to you;
- we have contact with people who are either your household members or associated with you such as family, friends and neighbours;
- you use our 'guest' wi-fi services in one of our buildings, websites, social media sites or self-service portal; In relation to 'guest' wi-fi we collect and retain device ID's (MAC addresses and IP addresses) which may be linked to other personnel records and so constitute personal data;
- we take photographs, audio sounds, videos and comments at events organised and/or hosted by Jigsaw or one of the companies within the Jigsaw Homes Group. The photographs, audio sounds, videos and comments may be used by us in a variety of online/offline platforms and may be provided to the media for publication in local or national media outlets. Distribution of these materials may be geographically diverse to promote the products and services of Jigsaw Homes Group. The material may be edited to enable use in a variety of formats but this will not change the sentiment of the views expressed therein. If you do not wish your image/material to be used by us in this way, please make this known to a Jigsaw employee at the event you are attending or, if it is after you have attended the event, by emailing [comms@jigsawhomes.org.uk](mailto:comms@jigsawhomes.org.uk)



- recordings of public meetings for the purpose of holding accurate records. In such incidences attendees will be notified of this prior to the recording commencing.
  - we record calls to and from our landlines in Connect (our contact centres) and retain these records for up to six months. All telephone calls made to our Contact Centre are recorded and are used to train and coach staff to improve the services that we provide to you;
  - we may collect data through technologies about you and your property. For example, about your energy usage via smart apps in the equipment we install in your home;
  - where we have CCTV cameras to record events in public areas and we monitor and collect visual images and audio for:
    - security reasons;
    - prevention and detection of crime; and
    - staff safety and monitoring purposes.
15. If you provide us with personal information relating to members of your family, your household or any other person we will assume that you do so with their knowledge and consent.
16. The Group may use mobile phone footage, still photographs or audio recordings supplied by residents to assist it in taking action against alleged perpetrators of anti-social or criminal behaviour.
17. It is important that you notify us of any changes to your personal information as soon as possible so that we can contact you easily.

## **5 What Is the Lawful Basis Under Which You Use My Data?**

18. Processing personal data is lawful if the data subject (for example, you as our customer) has given consent or where the processing of personal data is necessary for the performance of a contract to which the data subject is party to, or in order to take steps at the request of the data subject prior to entering into a contract.
19. Processing of your data is lawful if you apply for housing with us, apply for a job with us or have been housed by us. We do not need your explicit consent to process your data in these circumstances.

## **6 Do I Have to Provide This Information and What Will Happen if I Don't?**

20. In order to deliver our services, we will use your personal data to engage with you. The consequences of not providing accurate and up to date personal data may mean that we can not effectively manage either the service we provide, or the contract we have with you.

## 7 How Will You Use the Information You Hold About Me?

21. We use your personal information to:

- enable us to provide you with services, accommodation and to communicate with you;
- confirm your Right to Rent;
- provide social and other types of housing;
- 
- determine any service adjustments
- undertake property and grounds maintenance, repairs and improvement/upgrade works;
- manage your housing, your tenancy or lease and your accounts as your landlord or provider of another service to you;
- ensure we meet all our legislative, regulatory and funding requirements;
- promote equal opportunities and fair treatment for all our customers;
- provide information (e.g. about products and services) you request from us;
- help with addressing reports of anti-social behaviour (including civil proceedings), crime prevention, prosecution of offenders and resolution of disputes. Where an allegation of a tenancy breach is made we will record the details on our case management system and will retain the details in accordance with our adopted document retention schedule. Allegations of anti-social behaviour, whether or not they are proven, may be used to support subsequent neighbourhood safety case work;
- assess your ability to afford our home ownership products by sharing your name, address and contact details with our appointed contractor. We will also notify any third parties involved in the sale of the property you are buying of the outcome of your application;
- prevent and detect fraud and money laundering;
- promote safety and the quiet enjoyment of our neighbourhoods and communities in our capacity as social housing providers;
- engage with customers and make improvements to our products and services;
- improve services by gathering your feedback in automated surveys;
- protect individuals from harm as part of our safeguarding duties;
- provide you with welfare services including advice and appropriate support;
- provide support for elderly and vulnerable customers;

- to appropriately indemnify and protect the data controller or members of the Group against loss;
- comply with grant funding requirements placed upon us by other organisations;
- keep in touch with our customers, understand your needs and preferences and invite you to events;
- apply for grants to make improvements to your home; and
- carry out research and to provide anonymised information to help improve our services.
- we may record public meetings for the purposes of holding accurate records

## 8 What Is Sensitive Personal Data?

22. Certain personal information is classified as ‘special categories data’ and means any personal data which tells us about your ethnic origin, political opinion, religious or philosophical beliefs, trade-union membership or anything revealing your genetic data, biometric data or anything which has the purpose of uniquely identifying you, anything concerning health or data relating to a person’s sex life or sexual orientation, allegations of criminal offences and criminal convictions and offences.
23. We minimise our holding and use of special categories data but, given the services we provide, there are times when we use it to understand our customers and their needs better. Examples of this include when providing accommodation for disabled persons, when resolving neighbourhood disputes involving alleged criminal activity or anti-social behaviour or when helping someone to access care services. When we collect specific sensitive data we will notify you of how we will use it, including who it may be shared with, and seek your consent to this.
24. We also use sensitive personal data to ensure that we are complying with our obligations under the Equality Act.

## 9 Will You Be Using My Information to Make Any Automated Decisions?

25. If you hold a tenancy or lease with us no automated decisions are made that could result in reducing the security of your tenure.
26. For services that are provided to an individual who does not hold a tenancy or lease we do not propose to use your personal data to make any automated decisions. Should our policy change, we will write to you and tell you this.



## 10 Who Do You Share My Information with?

27. Your personal information will be kept secure and confidential. Access to it by staff of Jigsaw Homes Group is managed and monitored. We may share information with contractors to facilitate landlord services or with agencies we work with such as the Regulator of Social Housing, the Housing Ombudsman Service, local authorities, organisations that prevent and detect crime or fraud, payment solutions companies, other social landlords, solicitors acting on behalf of the data controller, advocacy partner organisations, mediation services, professional advisors and consultants, charities and voluntary organisations, energy hubs, government departments and any other situation where we are required by law and/or where we believe it is in your, or the public's interest, to do so.
28. We may share your data with companies who provide cloud-based information services and systems, and those companies that support our IT infrastructure. Any third party asked to process your personal data on our behalf will be bound to strict terms and conditions outlined by us and will not be permitted to share your data with other organisations.
29. We will not transfer your data to any organisation outside of the European Economic Area; with the exception of the following;
- our material supply arrangements which, in some cases, may require property addresses to be processed in India as part of our supplier's purchase ledger activities.
  - US hosted Jigsaw Foundation application process.
  - US hosted Jigsaw Rewards and My Jigsaw activities with customer personal data pseudonymised for security.
30. The list below sets out specific examples of where we may share your information but this is not an exhaustive list. In processing your personal data we may:
- share current or forwarding addresses with utility companies and council tax offices to ensure billing details are correct;
  - share information about you with authorised debt recovery agencies to enable them to recover the debt if you default on any tenancy/licence conditions. This may affect future applications for tenancies, credit and insurance;
  - discuss your financial situation and share information about rent payments (including any arrears) and any claims made for welfare benefits with the local authority housing benefit department, the local authority's housing advice and homeless prevention team or the Department of Work and Pensions to make sure that you receive any entitlement that you are due;
  - share information about you, including your bank account details, with payment solutions companies who collect rent, services charges and other monies on our behalf;
  - pass data about your rent payment record to credit reference agencies to enable them to assist other organisations to assess your financial standing if you apply for products and services;

- provide your contact details and other relevant personal data to contractors, sub-contractors, insurers and associated businesses/organisations in order to assess/manage your property and carry out repairs, maintenance and improvements to your home.
- pass your contact information to a third party to conduct surveys and research on our behalf which allow us to comply with regulatory requirements, gather feedback and improve the services we offer you;
- share your National Insurance number with the Department for Works and Pensions to verify your Universal Credit application and manage these payments;
- share your details with statutory agencies and other registered providers in order to prevent and investigate tenancy and Right To Buy/Acquire application fraud;
- Share your details with the commissioning/funding body if you are enrolled on a service commissioned by a third party for us to deliver you a support service;
- share your energy usage data with energy companies (other than your preferred energy supplier) and with heating product manufacturers.

## **11 Changes to This Privacy Notice**

31. This privacy notice will be updated to reflect any changes either to the way in which we operate or changes to data protection legislation. We will bring any significant changes to your attention but to make sure that you keep up to date, we suggest that you revisit this notice from time to time.

## **12 How long Will You Store My Personal Data for?**

32. We store personal data in line with our adopted document retention policy, a copy of which is available on request.

## **13 How Will My Personal Data Be Stored and Kept Secure?**

33. The Group applies technical measures to store personal data securely on information systems, including controls over the organisation's information network perimeter, such as firewall, anti-virus software and back-up/replication measures to prevent data loss. Access to personal data held on systems is controlled by password and can be monitored by audit records. Sharing of data with third parties is controlled by the use of secure transfer measures such as encrypted email and secure file transfer protocols.
34. Data held on mobile devices (smart phones, tablets and laptops) used by staff is encrypted. Staff are not permitted to use an unsecured wi-fi network to perform their

duties and are equipped with lockable bags for carrying personal data files outside of the office. A clear desk policy is in operation at all of our offices.

35. The technical measures are supported by training and awareness raising to ensure that staff understand the risks and their responsibilities for keeping personal data secure.

## 14 Your Rights in Relation to the Personal Data You Provide

36. We have set out below some information on the rights you have under the General Data Protection Regulation. More information can be found by visiting the ICO website at [www.ico.org.uk](http://www.ico.org.uk).

37. You have the right to:

- be informed about our collection and use of your personal data;
- access the personal data we hold about you;
- ask us to rectify any personal data we hold about you if it is inaccurate or incomplete;
- ask us to delete any personal data we hold about you. We will hold your personal data in accordance with our adopted data retention schedule but if you would like us to delete data sooner please contact us. We do need to maintain certain records to enable us to comply with our contractual, statutory and tenancy/lease management obligations so certain information may still be retained by us even if you make such a request. Due to this we may decline a request for data deletion;
- restrict the processing of your personal data;
- data portability (obtaining a copy of your personal data to re-use with another service or organisation);
- object to us using your personal data for particular purposes;
- be informed about when we are using your personal data in automated decision making and profiling and object to this. We will inform you where such decisions and profiling occur; and
- withdraw consent you have given us to use your personal data although certain data will still be required to enable us to fulfil our contractual responsibilities. Request to withdraw consent should be made in writing to [dpo@jigsawhomes.org.uk](mailto:dpo@jigsawhomes.org.uk) or the Data Protection Officer at Cavendish 249, Cavendish Street, Ashton-under-Lyne, OL6 7AT.

## 15 How Do I Complain About How You Use My Data?

If you have any cause for complaint about our use of your personal data, please contact the DPO using the details set out earlier in this document.

If you remain dissatisfied with our response you have the right to lodge a complaint with the ICO. Further details are available at [www.ico.org.uk](http://www.ico.org.uk).

## 16 Accessing Your Information

38. You have the right to access any personal information we hold about you, which we call a Subject Access Request (SAR).
39. If you make a request to the Group or any member of it we will review the personal information held about you by all members of the Group when compiling our response.
40. It should be noted that the right of access is there to provide you with your personal data rather than giving the right to see copies of documents containing your personal data. We are not obliged to provide copies of original documents and some personal data may therefore be provided in the form of transcripts of relevant documents, sections of documents, or extracts of relevant information from our systems.
41. Where we process a large volume of data about you then we will ask that you specify the information or processing activities your request relates to. The time limit for responding to your request (outlined below) will be paused until clarification is received.

### 16.1. How to Make a SAR

42. You can make a request verbally or in writing to [dpo@jigsawhomes.org.uk](mailto:dpo@jigsawhomes.org.uk) or by letter to our registered office - Cavendish 249, Cavendish Street, Ashton-under-Lyne, OL6 7AT

### 16.2. Can We Ask for ID/Proof of Authority?

43. We need to be satisfied we know the identity of the person making a SAR (or the person the request is made on behalf of). To do this we may require proof of identity from you before releasing information. Depending on the circumstances this may include:
  - Proof of signature/photo ID (for example driving licence / passport)
  - Proof of address.
  - If you are a tenant or a leaseholder we may accept verbal confirmation via Connect once their security checks have been completed with you.
44. Where a request is received from a third party claiming to represent you, we will also ask them for proof of this, which must include your signature that is verifiable against documentation we already hold. We also reserve the right to contact you directly to confirm the third party's appointment.
45. In the case of verifying ID and consent for a third party to act on your behalf the timescale for responding to a SAR will not begin until we have received the requested information.

### **16.3. How long Will a SAR Take?**

46. Ordinarily we are required to provide the information requested within one calendar month of receiving your request. This can be extended to three calendar months should a request be considered complex.

### **16.4. When Can We Refuse to Comply with a Request?**

47. In certain circumstances we can refuse to fulfil a SAR. These are:
- Where the request meets the manifestly unfounded and/or manifestly excessive criteria laid out by the ICO.
  - Where an exemption under UK GDPR applies.
48. Should we refuse your request we will clearly outline the reason why along with your rights to make a complaint to the ICO.

### **16.5. Can We Charge a Fee?**

49. We will not normally charge for information requested via subject access request. However we can charge a 'reasonable fee' for the administrative cost of complying with a request if a data subject requests further copies of their data previously provided through SAR provisions.
50. Updated 29th November 2024



## Creating homes. Building lives.

Jigsaw Homes Group Ltd.

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Regulated by the Regulator of Social Housing Registration No. LH 4345

Registered under the Co-operative and Community Benefit Societies Act 2014 Registration No. 29433R

Document produced on 17 December 2024.