



Paradigm Privacy Statement February 2022

The purpose of this document	<p>This privacy notice tells you what you can expect us to do with your personal information when you contact us or use one of our services. It applies to information about housing applicants (both potential tenants and potential shared owners), residents, job applicants, business partners or stakeholders, visitors to our website, and other service users.</p> <p>We keep our privacy notice under regular review to make sure it is up to date and accurate, so we may update it at any time. We may also notify you in other ways, from time to time, about the processing of your personal information. We will place any updates to this privacy notice on our website https://www.paradigmhousing.co.uk</p> <p>We encourage you to periodically review the statement to stay informed about how we are helping to protect the information we collect.</p>
Our Role	<p>We are a "data controller". This means that we are responsible for deciding how we hold and use personal information about you.</p> <p>Our role is to comply with UK data protection law and ensure the personal information you provide to us is:</p> <ul style="list-style-type: none">● used lawfully, fairly and in a transparent way;● collected only for valid purposes and used only in any way that is compatible with those purposes;● relevant to the purposes we have told you about and limited to those purposes only;● accurate and kept up to date;● kept only as long as is necessary for the purposes we have told you about;● kept securely.
The kind of information we hold about you	<p>Personal data, or personal information, means all information about a living individual from which that person can be identified, directly or indirectly, from that data. It does not include data where the identity has been removed (anonymous data). Most information we hold about you and other household members, will be collected from you. We hold all recognised types of personal data as described below.</p> <ul style="list-style-type: none">● Personal and Contact information - name, age, gender, date of birth, relationship status, home address, shipping address, email address, and phone number(s), employment status, caring responsibilities.● Financial information - bank details, account numbers, and financial transactions, income and benefits details, council tax, access to financial services such as credit unions.● Behavioural information – information revealing web browsing, and application usage.● Identifiers – ID numbers, National Insurance number, social security numbers, IP addresses and cookies.● Password information or authentication data - such as user accounts or information that confirms your identity.● Photo, audio, or video material in context - call recordings, surveillance cameras,● Consumption data - that relates to individuals such as from smart meters. <p>We collect your name and contact details (including those of other household members and of anyone you may choose to represent you) for use across the organisation and by our contractors, suppliers, and partners.</p> <p>We also hold "special categories" of more sensitive personal data that require a higher level of protection. This may include personal data concerning or revealing:</p>

	<ul style="list-style-type: none"> • racial or ethnic origin, religious or philosophical belief; • a person's sexual orientation; • gender identity; • a person's health - medical history, prescriptions, relationships with doctors/healthcare providers, physical or mental health including disabilities or impairments, communication and accessibility requirements, and the provision of health care services; • criminal offences - personal data about criminal allegations, proceedings, or convictions. <p>As a social landlord, we may collect, create, or otherwise obtain the following information relating to tenancy records or additional support needs:</p> <ul style="list-style-type: none"> • your name, address, gender, contact details such as telephone, number(s), and email address(es), marital status, date of birth, National Insurance number, health information, information about other occupants (including any children), next of kin, proof of identity; • bank account details and other financial information such as employment information, benefits entitlement, and your household income; • information relating to applications to exchange your home with another social housing tenant, or the succession of your tenancy to next of kin; • cases of anti-social behaviour or any concerns about your welfare; • information about your health and support needs to ensure appropriate care or support is provided by us, or another agency involved in your care; • other information to enable us to manage your tenancy effectively, monitor our housing allocations and for statistical and regulatory reporting purposes. This includes your ethnicity, nationality, religion, language preference, and gender identity. <p>When planning new development schemes, we may hold planning and consultation events to obtain feedback from the public and local residents about proposed schemes. When we do this, we will hold the information given to us by those participating in such events for as long as is required to complete and conclude the survey.</p> <p>We do not provide services directly to children but do collect their personal information to meet our need to know all the occupants in our properties and to meet any child safeguarding obligations. The information in the relevant parts of this notice applies to children as well as adults.</p>
<p>How your personal information is collected and where it is collected from</p>	<p>Most information we hold about you and other household members will be collected from you. Depending on your needs we may also collect information in a variety of ways including from:</p> <ul style="list-style-type: none"> • your local authority; • your doctor or other health professional; • your previous landlords or property agents; • professional advisers such as financial or mortgage advisers; • solicitors or legal representatives; • law enforcement agencies; • publicly accessible sources or market research organisations to validate, or where appropriate, enhance the information that we hold; • our websites; • various forms and contracts; • our ongoing contact and correspondence with you or with other support agencies which relate to you; • people associated with you such as family, friends, and neighbours. <p>We record calls to and from our Customer Services team.</p> <p>At some offices, sites, and estates we have CCTV cameras to record events in public areas.</p>

<p>Why we need information about you</p>	<p>We collect and process personal information to enable us to provide social housing accommodation and services which include:</p> <ol style="list-style-type: none"> a. assessing housing applications and service eligibility; b. letting, renting, and leasing properties; c. administering waiting lists; d. carrying out research; e. using your data to test, maintain, and improve our systems; f. administering housing and property grants; g. providing associated welfare services, advice, and support; h. maintaining our accounts and records; i. supporting job applicants; j. supporting and managing our employees, agents, contractors, and other business stakeholders. <p>Personal information is only collected, created, or otherwise obtained for specific and legitimate purposes relating to different aspects of your relationship with us and will not be used for any other incompatible purpose.</p> <p>We must identify the most appropriate lawful basis for processing personal data. These set out why it is legally necessary to control and process that personal data. There are 6 possible Lawful Bases but only 4 of these, listed below, are likely to apply to processing we undertake.</p> <ol style="list-style-type: none"> 1. Contractual: Necessary for the performance of a contract with you or to take steps to enter into that contract. 2. Legal obligation: Necessary for compliance with our legal obligation(s) 3. Legitimate Interest (of ours or a relevant Third Party): Necessary for our legitimate business purposes as a provider of social housing (including commercial benefit), except where such interests are overridden by your interests, rights, or freedoms. 4. Consent: Where you have given your consent to the processing of your personal data. <p>We need personal data about you to provide the services you would reasonably expect from us, and that enable us to comply with our legal obligations. In some cases, we will use your personal information for our legitimate interests. Where none of these reasons apply, we will request your consent.</p>
<p>How we use information about you</p>	<p>We only use your personal information for the purposes that we have collected it for or are reasonable and compatible with that original purpose.</p> <p>To meet contractual requirements we use information:</p> <ul style="list-style-type: none"> • that enables us to accept an application to let or purchase a property, and verify your identity; • that enables you to enter into a contract with us to let or purchase a property; • that enables you to sign up for a service or online account so we can manage your account and provide your service. <p>To fulfil our legal obligations we hold and use personal information:</p> <ul style="list-style-type: none"> • about your personal history, or those of your household members, including anti-social behaviour and offences, if we need it to look after our staff, business, or anyone else; • to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). • to establish support needs relevant to a housing application or tenancy, including child support needs; • to prevent fraud, and illegal sub-letting and to confirm eligibility for housing, we will verify your identity and, dependant on your type of housing, we will ask for proof of ID and may take your photograph; • to prevent money laundering we may request proof of funds, the source of those funds, and identification of the provider;

	<ul style="list-style-type: none"> • to assist with personal security and prevention and detection of crime, we use CCTV systems to monitor and collect visual images if you visit an estate, office or community facility which is covered by these systems; • to demonstrate to our regulator that we are fulfilling our obligations, for example around anti-discrimination laws; • to prevent and detect crime, and for quality management thereby meeting the requirements of our funders or regulators. <p>To meet our legitimate interests, or those of a relevant third party, we use your contact and other information to:</p> <ul style="list-style-type: none"> • communicate with you and keep you up to date with news and events in your area, and those relating to the essential services we provide to you; • tell you about services (some provided by other organisations we work with) that we think may help you and assist us in meeting our objectives, such as accessing training and employment, financial guidance, and energy efficiency; • contact you in the event of an emergency; • manage, or enforce the terms of, your tenancy or lease; • reach you when we need to. This may be to discuss issues relating to your tenancy or lease, arrange essential servicing, gain access for maintenance and improvements, organise a home visit, contact you in the event of an emergency, and to resolve or investigate complaints; • know who will be living in our premises so we can check that accommodation offered is adequate for current and near future needs; • ensure our services are accessible, and that we take account of any support needs; • hold records of all our contact with you, or third parties representing you, or about you, including call recordings for training and quality monitoring purposes; • maintain financial records (including bank details) about the money you have paid us, any amount(s) outstanding and associated recovery action, and about your credit status; • maintain records of your household members and ensure we are meeting the needs and expectations of all service users; • correctly calculate chargeable rent to eligible tenants and advise local authorities of rent or service charge changes; • identify and monitor tenants at risk of rent arrears to help prevent this happening; • carry out statistical analysis, market research and customer satisfaction surveys so we can monitor our performance and improve our services; • monitor our website usage so we can make our website better. <p>When we request your consent.</p> <p>In some instances we will request your consent to collect and use your personal information such as when conducting equality and diversity surveys or for customer profiling. In these instances, we will tell you why we are requesting the information and what the information will be used for. We may also request your explicit consent when collecting and using particularly sensitive information as described in the section below.</p> <p>In all instances where you have provided your consent, you can withdraw this at any time—please see the section headed “Right to Withdraw Consent” below.</p>
<p>How we use particularly sensitive personal information</p>	<p>"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing, and using this type of personal information. We may process special categories of personal information in the situations listed below.</p> <ul style="list-style-type: none"> • In limited circumstances, with your clear written consent. • Where we need to carry out our legal obligations. • Where it is needed in the public interest. • Where you have already made your personal information public. • Where we or another person needs to bring or defend legal claims. <p>We use this special category data to ensure services are delivered appropriately and to monitor equality, diversity, and inclusion. In the case of certain health information, this may</p>

	<p>be needed for health and safety purposes and / or social protection, or to provide additional support services. Where provision of this information is optional, we will make this clear at the point of collection and we will ask for your specific informed consent at the time of collecting this type of data. You have the right to withdraw this consent at any time. Please see section headed “Right to Withdraw Consent” below.</p> <p>There may be times where we will not need your consent to process and/or share this type of data. It may also apply where we need to protect the vital interests (i.e. the health and safety) of you or another person, where you have already made your personal information public, or where we or another person needs to bring or defend legal claims.</p> <p>This will apply where we are permitted or required to do so by law, such as under Health and Safety Legislation, or where processing is necessary to meet our obligations under Social Protection Law. It may also apply where we need to protect the vital interests (or another person) and you are not capable of giving your consent, or where you have already made the information public.</p>
<p>How we use website information</p>	<p>As a website user, we collect information:</p> <ul style="list-style-type: none"> • about your computer and about your visits to and use of this website, including your Internet Protocol (IP) address, your cookie preferences, geographical location, browser type, referral source, length of visit and number of page views; • relating to transactions carried out between you and us on or relating to this website; • you provide to register with us or subscribe to our services including name, address, email, telephone number and, where relevant, the type of property you are looking for; • other information you choose to send to us. <p>We will use this to:</p> <ul style="list-style-type: none"> • monitor usage, administer the website, and improve your browsing experience; • provide relevant website services, such as contact requests complaints reporting and payment services; • produce anonymous statistical information about our website users to help us develop our website and services; • occasionally collect information for surveys, or competitions. Participation is voluntary, which means that individuals choose whether or not to provide their information. <p>If at any time you submit personal information for publication on our website, (say to submit a CV or request information) we will use that information in accordance with the permission you grant to us, and only for the specific purpose for which it is submitted.</p> <p>Our website may provide links to third party websites as a service to our users. This privacy notice does not apply to those sites.</p> <p>Use of Internet Protocol (IP) Addresses An IP address is a set of numbers which is automatically assigned to a visitor’s computer whenever they log on to their internet service provider or through their organisation’s computer network. Their computer is identified by the IP address assigned to it during their session on the Internet. We may collect IP addresses for the purposes of systems administration and to audit the use and activity of the website. We do not link a visitor’s IP address to any other personal information that may be held about them.</p> <p>Use of Cookies ‘Cookies’ are small files saved to your computer or device to collect information about how you browse the site. Using www.paradigmhousing.co.uk means you agree to our use of cookies. See our separate cookie policy to find out how to manage cookies or turn off this function We use cookies to measure how you use our site so it can be updated and improved, but these are not used to identify you personally.</p>

<p>What we share with third parties and why.</p>	<p>We may share your personal information with third parties where required by law, where it is necessary to manage our relationship with you, or where we have another legitimate interest in doing so. We may also need to share your personal information with a regulator or other statutory bodies to comply with the law.</p> <p>Where ‘sharing’ is in our legitimate interests, we may share your information with:</p> <ul style="list-style-type: none"> • our contractors to facilitate repairs, maintenance or improvement works, address “snagging” issues after you have moved into a newly developed scheme; • utilities companies and relevant local authorities so they can update their account information after you have moved into a property; • debt and money management advisors; • local authority teams such as housing, social services, environmental health, and benefit agencies; • Council Tax Departments to ensure billing details are correct; • system providers of on-line payment services; • independent mortgage advisors, legal advisers, and solicitors; • insurance intermediaries, insurance advisers, and insurers; • estate agents who help us market our properties and schemes; • third parties providing services on our behalf, such as a mailing company distributing customer correspondence, a research company carrying out customer surveys, or a debt collection agency pursuing former tenant arrears. <p>We are also legally permitted, or obliged, to share your information with organisations such as:</p> <ul style="list-style-type: none"> • agencies committed to protecting public funds and/or preventing fraud; • police and other relevant authorities (e.g. Department of Work & Pensions, Probation Service, HM Revenue and Customs) in relation to the prevention and detection of crime, the apprehension of offenders or the collection of tax or duty; • other statutory organisations e.g. social services, health authorities, and the National Housing Federation, as required to meet statutory functions; • our solicitors or the courts if we’d been unable to access your home for an annual gas safety check or to carry out any of our other duties as a landlord. <p>We may also share information when required by law, or to protect an individual from immediate harm. This may include sharing specific concerns about children’s safety and wellbeing with the relevant local authority and other agencies if we were obliged to make a ‘safeguarding’ referral or following an eviction affecting a child. It may also include sharing information about anti-social behaviour with the police, a relevant local authority or community mental health services.</p> <p>CORE Data sharing If your household has entered a new social housing tenancy after 1989, we would have shared your personal information with the Government for research and statistical purposes.</p> <p>The information is provided via CORE (COntinuous REcording). CORE was set up in 1989 and initially only recorded data from private registered providers, but from 2004 local authority lettings are also recorded. It collects information on the tenants/buyers, tenancy/sale and dwelling itself. Data is only shared for research and statistical purposes. The information shared is anonymous and used to help the government understand better the social housing market and inform social housing policy.</p>
<p>How we protect the information we hold about you</p>	<p>We apply appropriate technical and organisational measures to ensure your personal information is secure. For example, we have secure customer management systems in place to ensure that access to personal information is restricted to authorised individuals on a strictly need-to-know basis.</p> <p>To help us ensure confidentiality of your personal information we will ask you (and any of your authorised representatives) security questions to confirm your identity when you call us and, as may be necessary, when we call you.</p>

	<p>We limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.</p> <p>All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes.</p>
Data retention - How long we keep and use your information	<p>We are committed to retaining your personal information only for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. The personal information you give us, or which we collect from other parties to meet our legitimate interests, legal obligations or contractual needs is held during the period of our relationship with you and for a set period afterwards to allow us to meet certain legal obligations. As a general rule, we will keep it for 6 years from the end of your relationship with us.</p> <p>The limited and specific information collected and shared with the Government for research and statistical purposes is kept by us for 1 year only then deleted.</p> <p>Information you give us with your consent is deleted when no longer required or when you withdraw that consent.</p>
Automated decision-making	<p>We sometimes use automated systems and tools to inform the decisions we make but do not make decisions about you using solely automated means.</p>
Transferring information outside the UK, EU, or EEA	<p>We do not transfer your personal information outside of the UK, EU (European Union) or EEA (European Economic Area).</p>
Your rights in relation to personal information	<p>Under certain circumstances, and depending on the reasons why we hold and process your personal data, you have the right by law to:</p> <ul style="list-style-type: none"> ● request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it; ● request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected; ● request that your personal information is erased. This allows you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to stop processing personal information where we are relying on a legitimate interest and there is something about your situation that makes you want to object to processing on this ground; ● request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it; ● object to the processing of your personal information in certain circumstances; ● request the transfer of the personal information you gave us to another party, or to you, in certain circumstances; <p>If you want to exercise any of these rights, please contact Customer Services in writing; please see section headed "Paradigm's Contact details" below.</p>
No fee usually required	<p>You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.</p>

Right to withdraw consent	<p>In the limited circumstances where you may have provided your consent to the collection, processing, and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact Customer Services in writing. Please see section headed “Paradigm’s Contact details” below.</p> <p>Once we have received notice that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law. We will tell you if this is the case.</p>
Your duty to inform us of changes	<p>It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.</p>
How to complain	<p>If you have any concerns about our use of your personal information, you can make a complaint to us by calling us on 0300 303 1010, or emailing us on enquiries@paradigmhousing.co.uk, or by writing to us at the address in “Paradigm’s contact details” below.</p> <p>You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. ICO’s contact details are in the section headed “The Information Commission’s Office’s contact details”.</p>
Data Protection Officer	<p>We have appointed a Data Protection Officer, Ewan Wallace, to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the Data Protection Officer. Please see section headed “Paradigm’s Contact details” below.</p>
Paradigm’s contact details	<p>Customer Services’ Email: enquiries@paradigmhousing.co.uk</p> <p>Telephone: 0300 303 1010</p> <p>Or write to: 1 Glory Park Avenue Wooburn Green Buckinghamshire, HP10 0DF</p> <p>Data Protection Officer’s Email: dataprotectionofficer@paradigmhousing.co.uk</p>
The Information Commissioner’s Office’s contact details	<p>Postal Address:</p> <p>Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF</p> <p>Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number Fax: 01625 524 510</p> <p>Website: https://ico.org.uk/</p>
Date of Review	February 2022