



shaped around you

PRIVACY STATEMENT

New legislation called The General Data Protection Regulations (GDPR) will take effect from 25 May 2018. The regulations are designed to set out the way in which Alpha must deal with the data you provide to us. Regulations also require Alpha to tell you how this will be done and to advise you of your rights under this policy. This privacy statement sets out how Alpha will do this.

Alpha respects an individual's right to data privacy and data protection in line with data protection legislation. By this we mean the Data Protection Act 1998 up to and including 24 May 2018 and the General Data Protection Regulation (GDPR) thereafter.

This Privacy Statement has been developed in order to advise you of how Alpha will collect, store, use, share, and protect (collectively known as 'process') the personal/sensitive personal/special category information (collectively known as 'information') it comes into contact with. If you have a tenancy or other written agreement with us it may contain further information about our processing of your information.

By giving Alpha your information or by using our website or platforms you are confirming that you are accepting the practices outlined in this Privacy Statement. If you do not accept the outlined practices, you are entitled not to give us the information, however for some of the services provided by Alpha, it is necessary to obtain certain personal information and in some circumstances if you refuse to give us the data we require, we may be unable to provide such services. We will advise of the circumstances appropriate to the situation at the time, if that situation occurs.

We reserve the right to make changes to this Privacy Statement at any time and we recommend that you regularly review this Privacy Statement to ensure that you are aware of any changes and how your information may be used. We anticipate making further changes to this Privacy Statement as part of our compliance and planning for the introduction of the GDPR.

For the purposes of the data protection legislation, Alpha is the Data Controller (i.e. the company which is responsible for and controls the processing of your personal data) of the information that you supply it. On occasion this information may be shared with a third party who will act as a Data Processor to carry out a specified function on behalf of Alpha.

If you have any requests concerning your personal information or any queries with regard to this Privacy Statement please contact us on enquiries@alpha-living.co.uk

Who are we?

Alpha RSL Limited ('Alpha') is a registered provider of social housing whose registered office is Thursby House, 1 Thursby Road, Croft Business Park, Bromborough, Wirral, CH62 3PW.

Alpha is listed with the Office of the Information Commissioner as a Data Controller with the reference number Z7513055.

What does this Privacy Statement apply to?

This Privacy Statement applies to personal/sensitive personal/special category information (collectively known as 'information') that we collect from or about our applicants, residents or visitors to our websites, platforms or portals.

The methods we use to collect this information are:

- The Alpha web site
- Third party social platforms such as Facebook and Twitter
- Application forms
- Personal interviews
- Data from other sources

This is information that we may obtain about you from other sources. An example of this is that we may hire a third-party organisation to collect information on our behalf to conduct satisfaction surveys, this would be to shape service delivery.

What information is being collected?

How you interact with us determines what information we collect from you.

We aim to limit the amount of information we process to that which is reasonably necessary to provide you with our services.

In order to limit information requests, we will combine information that we receive from different sources and process it together.

The information we collect from you can be categorised under the following terms:

Personal Information

This is information that could be used to identify you as an individual:

- name (including previous names)
- date of birth
- marital status
- nationality
- residential status
- and national insurance number

Alpha would have collected this type of information from you in order to access a service or apply for or enter into a contract with Alpha.

Sensitive Personal Information/Special Category Information

In order to access some Alpha services and for legislative requirements it may be necessary to collect your sensitive personal/special category information. This type of information includes details on your:

- gender
- race
- ethnicity
- physical or mental health medical needs
- incomes and outgoings, and
- bank details

Criminal convictions and offences

In order to manage anti-social behaviour cases, it may be necessary for existing residents or applicants to disclose their unspent criminal convictions and offences.

Personal contact information

This is the information you have given us in order for us to be able to contact you and includes:

- telephone numbers
- email addresses
- alternate postal addresses and in case of emergency, and
- Next of kin details

Account Log in Information

If you set up an online account with Alpha this would refer to the username, password and answers to the security questions you would have use to manage your online account.

Technical Computer Information

This is information about the computer/smart phone/tablet used to access a website, platform or portal. This information is usually collected through cookies and can include the IP address, operating system and browser; if accessing through a smart phone this can also include the phones unique ID.

Residents/Visitor Feedback

This is information you voluntarily share with us about your experiences with Alpha and includes unsolicited comments, suggestions and feedback which is typically collected in surveys, user groups, contact forms and emails.

Social Network Information

This refers to any information that is part of your profile on a third-party platform (i.e. Facebook and Twitter) that you allow the third party social network to share with us. For example, your name, birthday and profile picture.

Monitoring

We may monitor and record communications with you (such as telephone conversations and emails) for the purposes of quality assurance, staff training, fraud prevention and dispute resolution.

What do we use your information for?

The following describes the various purposes for which Alpha might process your information and the different types of information that might be collected from you.

Please note that not all of the uses will be relevant to every resident / visitor / applicant.

Tenancy Management

In order to maintain your account with us we may use the information given to us when the account was initially set up. This would include your personal information and contact information.

Service Provision

In order to for us to provide services to assist the sustainability of a tenancy it may be necessary to process a resident's or applicant's sensitive personal/special category information.

An example of this is when accessing our welfare advice, with consent we would use a resident's income and outgoings to establish benefit entitlements.

For the management of anti-social behaviour, it may also be necessary to process information on unspent criminal convictions and offences.

Customer Service

Customer services can be provided through different means such as in person, by email or over the phone. During these interactions we may collect and use your personal and Alpha account information to validate your identity and your contact information to respond to your enquiry.

Resident Engagement

In order to encourage resident/visitor engagement we may collect contact or feedback information.

Contests and Promotions

On occasion we may run competitions whether through Alpha or a third party platform such as Facebook and Twitter which for entry purposes requires personal and contact information.

For compliance purposes the winner's names and general location may be published or shared.

Marketing Communications

We may collect and use your personal and contact information to send you marketing communications such as emails, text messages, and postal mailings. These communications will keep you up-to-date on the latest news and events, from Alpha that may be of interest to you.

We will only send you marketing materials that you have consented to receive and consent can be withdrawn at any time. Legally there are communication items that we are legally obliged to send you and from which you cannot withdraw consent, an example of this is the annual rent notification.

If you participated in a promotion that involved a third party and you agreed to receive marketing information from them you will need to contact them directly to withdraw consent from receiving further marketing materials from them.

Website Improvement and Personalisation

We may collect and use your technical computer and account login information to improve and personalise your experience on our websites and platforms, it may also be used to show you specific Alpha content tailored to your interests.

Monitoring Requirements

For legal compliance and monitoring purposes we may use your personal and sensitive personal/special category information. An example of this is for equality & monitoring purposes when we may collect information such as your gender or ethnicity.

Other General Purposes

In order to maintain the day-to-day operation and security of our website/platforms/portals and conduct studies we may process your technical computer information and consumer feedback.

Where we have received personal information from other sources, we may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

Protecting your personal information

We are committed to ensuring your information is secure. At all times Alpha will take both technical and organisational measures to protect the confidentiality and security of personal information, irrespective of the method of collection.

Refusing to give us personal information

There are occasions when you may not want to share with us your information or withdraw previously given consent. It is within your rights to refuse or withdraw consent however it may mean that the services we are able to offer you are limited and you are unable to access personalised features.

Please note that there are some items of information that you cannot refuse or withdraw consent from if you wish to enter into or remain in a contract with Alpha.

Disclosing your personal information

We will never share information with any third party that intends to use it for direct marketing unless we have received specific consent from the individuals involved.

There are occasions when we will need to share your information with selected third parties, on these occasions Alpha will either have a Data Sharing Agreement or will have undertaken some form of due diligence with the third party to satisfy ourselves and to ensure that the third party keeps information private, secure and processed only in the way specified by Alpha.

Information will only be shared with the following types of third parties:

Contractors

In order to provide a service to you it may be necessary for Alpha to appoint a contractor, an example of this would be carrying out general repairs. The contractor would need to know your name and address in order to carry out the appointment and carry out the repairs.

Research companies

We may appoint research companies to carry out research on our residents to improve Alpha's service, know more about our residents or establish if there are any gaps in what we are doing. On these occasions if contacted individuals can refuse to participate.

Administration of Housing Management

By law there are occasions when we have to disclose your information. For instance if it is necessary to comply with legal proceedings or in order to protect the safety or rights of Alpha, its residents or the public. Alpha for example may share data with other organisations such as Department for Works and Pensions (DWP) or the Local Authority to receive rental account payments via benefit payments or for the calculation of benefit entitlement

Legal and Business Transfers

In the event of a merger/acquisition of part or the whole of Alpha the partner/acquirer would have access to the information obtained by Alpha and this information could be transferred as part of a reorganisation or similar event if permitted by and carried out in accordance with applicable law.

Internet Based Transfers

Given that the Internet is a global environment, using the internet to collect and process personal data necessarily involves the transmission of data on an international basis. Therefore, by browsing this web site and communicating electronically with us, you acknowledge and agree to our processing personal data in this way.

Accessing and amending your personal information

You have rights under the Data Protection Act 1998 and the General Data Protection Regulation regarding the information Alpha processes about you. These rights include:

Marketing

You have the right to ask us not to process your personal data for direct marketing purposes. We will ask you when we collect your personal data if we can use your data for such purposes or if we can disclose your information to any third party for such purposes. You can opt-out of receiving such marketing at any time.

Right of access

You have the right to access the personal information that we hold about you, to know what we hold, what format it is in, and to have a copy of it if you wish. This is called a Subject Access Request. This is a more formal process than, for example, simply requesting a second copy of your rent statement. Our staff will explain when your enquiry falls under the Subject Access Request process.

Right to rectification

If the information we hold on you is incorrect you have the right to ask us to correct it without undue delay and free of charge. You can exercise this right at any time by contacting us at enquiries@alpha-living.co.uk. There may be occasions where we require additional information in order to process your request - such as a name change needing proof of the change of name - and you will be required to specify the information that is incorrect and what it should be replaced with.

Right to Erasure /Right to be Forgotten

You have the right to request that all data held by Alpha which identifies you is deleted. You can also make this request at any time by contacting us at enquiries@alpha-living.co.uk. Please note we may be compelled to maintain your information due to specific legislative or regulatory requirements, for example we keep copy invoices in case of an HMRC investigation and if you have held a contract with us we will retain that information.

Consent

In some instances Alpha will require your specified informed consent to process your information. On these occasions the consent will be recorded and you have the right at any time to withdraw the consent.

Tracking Technology

Cookies

In order for us to gain an understanding of how visitors use our website and platforms as well as to improve a visitor's experience, we use cookies. The storage of cookies on your computer enables us to personalise your experience. The information contained within the cookie can include the IP address, operating

system and browser information. For further information on cookies, please refer our [Cookie Policy](#).

Spamming

Spamming is where unsolicited e-mails are sent to you containing advertisements or marketing related materials without your consent.

In accordance with the Data Protection Act and the General Data Protection Regulation, Alpha will not send you spam emails and we will not share your email address with third parties for them to use in this way.

No information you share with Alpha will be used for direct marketing unless you give us your consent which can be withdrawn at any time.

If for some reason you believe you have received spam e-mail from Alpha please contact us.

Where we store your personal data

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

How long do we keep your personal information?

We will only keep your information as long as is reasonably necessary and in line with our Data Retention Schedule. This does mean that your information may be retained for a period of time after you have stopped using Alpha services or the website/platforms.

Children

In accordance with the General Data Protection Regulation, Alpha will also seek consent from parents for children under the age of 16, who provide personal data to us.

Links to third party sites

On occasion our website/platforms may have links to third party sites. Visiting these sites is done so at your own risk and we do not control or have any responsibility or liability for the content or practices of any third party site, application or feature. Please check the relevant third party's privacy policies before you submit any personal data to these websites.

Contacting us

Alpha's registered address is Thursby House, 1 Thursby Road, Croft Business Park, Bromborough, Wirral, CH62 3PW and our e-mail address is enquiries@alpha-living.co.uk