

# **Parasol Homes Privacy Policy**

## **Our contact details**

Name: Parasol Homes

Address: Victoria House, 49 Clarendon Road, Watford, Herts, WD17 1HP

Phone Number: 020 3475 0588

Online Contact Form: Parasol homes – [Contact Form](#)

Website: [www.parasolhomes.co.uk](http://www.parasolhomes.co.uk)

Please contact us at [dpo@parasolhomes.co.uk](mailto:dpo@parasolhomes.co.uk) if you have any questions or concerns about data protection or wish to make a subject access request.

## **The type of personal information we collect**

We currently collect and process the following information:

- Personal identifiers, contacts and characteristics including:
- Your Name, Address, contact number and email address
- Date of Birth, National Insurance Number
- Photographic Identification
- Housing benefit information
- Health related information
- Criminal offence information
- Ethnicity

## **How we get the personal information and why we have it**

Most of the personal information we process is provided to us directly by you (or a specific person on your behalf in some circumstances) for one of the following reasons:

- For us to meet our legal and contractual obligations to you as a tenant.
- For us to ensure we can meet your needs as per your initial assessment/enquiry.
- In order to carry out effective and efficient processes.
- To mitigate any risks to you as a tenant/ Service user.
- To identify any specific risks to our housing employees (where applicable) and mitigate those risks where possible, whilst still being able to deliver a service.

**When applicable-** We also receive personal information from the following other sources in the following scenarios:

- From a social or case worker who is assisting you in finding suitable housing to meet your needs.
- From Allerton Group LLP and its subsidiaries (Allerton Care & Support) who provide care services to some of our residents, in order to support your housing and care needs
- The Local Authority in relation to your requirement for housing and/or care and support or in relation to your eligibility for Housing Benefit or in relation to any potential safeguarding concerns.
- From other residents or your friends and family.
- Your appointee with regard to your housing and/or care and support needs
- The Emergency Services in relation to any incidents which may arise linked to your housing and/or care and support.

We use the information that you have given us in order to carry out our duties as a social housing provider and in accordance with our legal obligations, and to provide an efficient and effective housing service with the support of our partner organisations. This also requires the gathering, recording, use of, sharing and storage of confidential information. We take security of information very seriously and are committed to ensuring that all personal information is used in accordance with the UK GDPR and relevant law.

We may share personal information with the organisations we receive information from. We will also share personal information with the staff of Allerton C&S Limited and its subsidiaries, by granting them access to 'Arthur Online' so they can view and/or input tenancy data. Arthur Online is the tenancy and asset management system used by Parasol Homes CBS. It holds the personal records of Parasol Homes' tenants including but not limited to your name, address, housing benefit information and property details.

Parasol Homes CBS and Allerton are part of the same ultimate group of companies. Parasol provides housing services, and Allerton provides care & support services.

We will collect data when you join Parasol, if you leave Parasol and throughout the duration of your tenancy. Parasol Homes and Allerton will also update information as and when necessary for tenancy related matters, as and when they arise e.g. *If you (tenant) move, or if you require property repairs or adaptations.*

Under the UK implementation of the General Data Protection Regulation (UK GDPR), the main lawful & legal basis we rely on for processing this information are as follows:

**The lawful basis for processing this data is:**

- Article 6(1)(b) UK GDPR – processing is necessary for the purposes of a contract. This covers our handling of information in support of your tenancy agreement or other contracts you have with us.
- Article 6(1)(c) UK GDPR – processing is necessary to comply with a legal obligation. We are subject to various legal requirements, such as health and safety law, safeguarding, and requirements relating to benefits and care and support needs. Some processing is therefore done on this basis.
- Article 6(1)(d) UK GDPR – processing is necessary to protect your vital interests. We may need to use or share information to keep you safe and well, for instance if you have an accident.
- Article 6(1)(e) UK GDPR – performance of a task carried out in the public interest – the data is processed to allow Parasol Homes to deliver housing services,

in particular supported living accommodation for vulnerable adults, and to support the delivery of associated health and care services.

- Article 6(1)(f) UK GDPR – processing is in Parasol’s legitimate interests and having regard to the rights of the data subjects, we consider the processing is compatible with/does not disproportionately impact on those rights. These legitimate interests include the effective management of our company, and ensuring that the interests of all our customers and staff are appropriately protected and promoted through our work.

We do not normally rely on an individual’s ‘consent’ to process their data but we try to involve people in decisions about how their information is used, and take account of their views, including through responding to requests from individuals to exercise their data protection rights. These are set out below.

**The legal basis for processing special category data is:**

- Article 9(2)(b) UK GDPR and Schedule 1 paragraph 1 of the Data Protection Act 2018 – social protection (i.e. social housing).
- Article 9(2)(h) and Schedule 1 paragraph 2 of the Data Protection Act 2018 – health and social care services.
- That the processing is necessary for reasons of substantial public interests (under Article 9(2)(g) of the UK GDPR, read with Schedule 1 paragraphs 6 and 16-18 of the Data Protection Act 2018) – to support the delivery of social housing and associated health and care services.

**How we store your personal information and how long we keep it for**

Your tenancy information is securely stored within the Arthur Online tenancy account system, it is locked down by user credentials (username and password) and only staff who are require access will be granted access. These staff have contractual obligations to maintain the confidentiality of your records and ensure they do not share this without an appropriate lawful basis. There maybe instances where Allerton need to share the

information from Parasol more widely, e.g. in an emergency if they are supporting a service user, confidentiality will only be breached if there is an appropriate legal basis for doing so.

We keep your tenancy records for a different amount of time depending on the record. In general, records are held for up to six years after you move out. This is the recommended time to store records before deleting them as per the records retention guidance from the National Housing Federation. We will then dispose of your information by deleting it permanently from the electronic system (Arthur Online).

Whilst you are a tenant of Parasol homes, we will keep your records secure and ensure that any changes required are completed without undue delay. You will need to inform us if any of your data is inaccurate or has changed so we can correct it within our system.

### **International data transfers and automated decision making**

We do not normally transfer information about our customers overseas. We may make use of 'cloud' software or systems which processes information abroad. Where we do this we will make sure that information is subject to similar levels of protection as if it were in the UK. We do not normally undertake automated decision making, which means making decisions about people without any human involvement, or profiling. We may use some automated services to support our services.

## **Your data protection rights**

Under data protection law, as a data subject you have the following rights (depending on the type of information and the circumstances, all requests will be dealt with on a case-by-case basis):

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erase** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights (in exceptional circumstances, or where this may require a substantial amount of administration time, we may ask for a small fee – cases of multiple requests for example). If you make a request, we normally have one month to respond to you, unless the request is complex or you have made multiple requests in which case the timeframe can be extended by a further 2 months.

## **How to complain**

If you have any concerns about our use of your personal information, you can make a complaint to us at [dpo@parasolhomes.co.uk](mailto:dpo@parasolhomes.co.uk) or in writing to

Data Protection Officer

Parasol Homes CBS

49 Clarendon Road

Watford

WD17 1HP

You can also complain to the ICO if you are unhappy with how we have used your data and if you are unhappy with any request you may have made to the Data Protection Officer.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>