

# Futures Housing Group Privacy Notice

## Contents

1	Introduction .....	2
2	Who is responsible for your data? .....	3
3	What types of personal information do we process about you? .....	3
4	Where do we get your personal data from? .....	12
5	How and why do we use your personal data? .....	13
6	How we protect your personal data .....	22
7	Social media .....	23
8	Sharing your personal data .....	23
9	Use of Google Analytics and Cookies .....	24
10	What if you don't want to provide certain information to us? .....	25
11	What are your rights under data protection laws? .....	25
12	Requesting access to your personal data .....	26
13	What should you do if your personal information changes? .....	26
14	Updates to our Privacy Notice .....	26
15	Who do I contact about data protection queries? .....	26

## 1 Introduction

- 1.1 Futures Housing Group ('the Group') is committed to protecting the privacy of all personal information it holds and processes. This Privacy Notice explains what personal identifiable information we collect about you, how we use it, who we share it with and how we keep it safe and secure. It also tells you about your privacy rights and how to get in touch if you need to.
- 1.2 It applies to the personal identifiable information we already hold about you and any further personal identifiable information we might collect about you, either from you or from a third party. How we use your personal identifiable information will depend on the products and services we provide to you.
- 1.3 This Privacy Notice is a public document available when Futures Housing Group obtains and uses your personal identifiable information. It explains how we and appointed third party organisations/people use your personal identifiable information and it details your rights. We obtain your personal identifiable information in order to conduct our normal business operations.
- 1.4 Our Mandatory Data Protection Officer (MDPO) provides help and guidance to make sure we apply the law to the processing and protection of your personal identifiable information. If you have any questions about how we use your personal identifiable information our MDPO can be reached by email at [dataprotection@futureshg.co.uk](mailto:dataprotection@futureshg.co.uk) or by writing to the Data Protection Manager, Futures Housing Group, Asher House, Asher Lane Business Park, Ripley, Derbyshire, DE5 3SW.
- 1.5 For more information about your rights and how our MDPO can help you, please refer to the following sections of this Privacy Notice:
  - Section 11 – What are your rights under data protection laws?
  - Section 12 – Requesting access to your personal data
  - Section 15 - Who do I contact about data protection queries?
- 1.6 This Privacy Notice provides up to date information about how we use your personal identifiable information and replaces any previous information we have published/supplied. If we make any significant changes affecting how we use your personal identifiable information, we will make changes to this Privacy Notice and we will let you know about these changes.

## 2 Who is responsible for your data?

- 2.1 Our Privacy Notice applies to all personal information that Futures Housing Group collects and processes. References in this Privacy Notice to ‘the Group’, ‘we’, ‘us’ or ‘our’ mean Futures Housing Group Limited of Asher House, Asher Lane Business Park, Ripley, Derbyshire, DE5 3SW.
- 2.2 Futures Housing Group is a ‘Group’ of companies. In this Privacy Notice, when we refer to ‘Group’, we mean other members of our ‘Group’ of companies, including holding and subsidiary companies. Futures Housing Group subsidiaries include:
- Futures Housing Group Limited;
  - Futures Homescape Limited;
  - Futures Homeway Limited;
  - Futures Greenscape Limited;
  - Limehouse Developments Limited; and
  - Five Doorways Homes Limited.
- 2.3 We are a ‘Data Controller’ of your personal data - this means we are responsible for how we collect and use your information.
- 2.4 As a registered social housing provider, we are regulated by the Regulator of Social Housing.

## 3 What types of personal information do we process about you?

- 3.1 When we use the term ‘personal data’ in our Privacy Notice, we mean information that relates to you and allows us to identify you. This can either be directly or when combined with other information that we hold on you. For example, we may hold your name, property address, contact details, information relating to your tenancy (such as tenancy ID) or records of your contact with us.
- 3.2 We will need to collect certain elements of personal data from you, for example if you apply for one of our properties or apply for a job with us. We constantly review the information we are collecting to ensure it is adequate, relevant and necessary for the purpose(s) we need it for.
- 3.3 We may collect and use the following categories of data about you:

	Personal data collected:	When we collect it:
3.3.1	Name, address, contact information.	When you contact us to enquire about any of our properties.
3.3.2	Previous landlord references, any previous rent arrears and anti-social behaviour.	Prior to offering you a property.

	<p>Details of any unspent convictions or criminal offences attracting a custodial sentence or on a register or person of interest.</p> <p>Details of any disabilities or medical conditions.</p> <p>Whether you are receiving support from external agencies or whether you have ever served in the UK armed forces.</p>	
3.3.3	Name, address, postcode, NI number, contact information, details of those living with you (name, date of birth, relationship to you, NI number).	When you sign up to one of our social rent properties, affordable rent properties or other forms of tenure.
3.3.4	Name, address, financial information, NI number.	When we need to assess your benefit entitlement and council tax, and/or process your application.
3.3.5	Details of those living with you (name, title, date of birth, NI number, gender, relationship to you, ethnicity).	When you're planning to share a property with other people.
3.3.6	<p>Name, address, postcode, previous address(es), NI number, contact information, details of those living with you (name, date of birth, relationship to you, NI number), gender, disability, financial details, religion, date of birth, nationality, political opinion, sexual orientation, transgender details, ethnicity, marital status.</p> <p>We may also collect certain relevant medical information, for example if you have a medical condition which means we may need to prioritise repairs at your property or contact you in a certain way.</p>	When we set up and maintain a tenancy agreement with you.
3.3.7	Contact data (name, address, telephone numbers, email address).	To ensure we are holding up to date details for you.
3.3.8	NI number, date of birth, tenancy reference number.	To ensure we have appropriately identified you.
3.3.9	Contact data (name, address, telephone numbers, email address), tenancy reference number.	To enable us to create a new tenancy agreement or Section 48 Notice.

3.3.10	Income details/details as to how you pay your rent, NI number.	To ensure you have the means to pay the rent.
3.3.11	Contact data (name, address, telephone numbers, email address), tenancy reference number.	To find out if you have any outstanding repairs.
3.3.12	Contact data (name, address, telephone numbers, email address).	To capture any feedback or concerns you may have (we may contact you to help us understand and resolve them).
3.3.13	Name, title, address, postcode, contact telephone numbers, email address, tenancy reference number.	To check we have up to date information about you.
3.3.14	Name, address, postcode, previous addresses, new addresses, credit history.	If you have former tenant debt.
3.3.15	Name, title, address, date of birth, NI number, telephone number(s), email address, ethnicity, details of those living with you (name, title, date of birth, NI number, gender, relationship to you, ethnicity), previous landlord references, support needs and support you are already receiving (this could include physical or mental medical information), unspent convictions for you or anyone living with you, details of your exchange parties (name, title, address, email address, phone number, their landlord contact details).	When you apply for a mutual exchange.
3.3.16	Name of account holder(s), bank details.	When you ask us to set up a direct debit.
3.3.17	Name, address, card details, tenancy ID.	When you make a payment by card.
3.3.18	Name, address, contact information. We may also collect certain relevant medical information, for example if you have a medical condition which means we may need to prioritise repairs at your property or contact you in a certain way.	When you request a repair, or we need to carry out essential maintenance on your property.
3.3.19	Customer name, property address, signatures, name of gas engineer,	When we carry out gas safety inspections on your property.

	engineer's gas safe number, contact details.	
3.3.20	Photographs of your property which may include personal belongings and show property condition. This may also include personal details about you.	When carrying out major works, Energy Performance Certificates, stock condition surveys, pre-work surveys, inspections.
3.3.21	Next of kin name, relationship and contact details.	In the event of an emergency and we need to contact someone on your behalf.
3.3.22	Name, address, contact details.	When you've had a repair or other service from us – we'd like to know how it went.
3.3.23	Name, address, contact details.	When you move into one of our new build properties, we'd like to know your views and experience so we can identify areas for future improvement.
3.3.24	Name, signature, images (photos, videos).	When we are looking at improving our service offerings, we may ask if you'd like to be involved in videos for research purposes.
3.3.25	Name, address, contact details, email address, details of children or household members affected, date of birth, ethnicity.  If relevant to your case, we may also ask for details of your religion, nationality, sexuality, gender, disability.	If you report anti-social behaviour.
3.3.26	Name, address, description of the incident, any contributory factors.	If we become aware of any unacceptable behaviour and/or violent/threatening instances, we will need to record these so we can effectively manage the incident until is satisfactorily resolved.
3.3.27	Name, address, contact number, email address.	If you need to make a complaint.
3.3.28	Name, title, address, postcode, contact telephone numbers, email address, tenancy reference number.	When you provide feedback or share concerns with us.

3.3.29	Name, address, income and expenditure, debt information, information to help you claim benefits.	When you have asked for money advice.
3.3.30	Age, postcode, gender, details of any physical or learning disabilities, income, savings, benefits, children's age (or date of birth if under one year).	To help assess affordability.
3.3.31	<p>Details of support needs you (or someone living with you) have.</p> <p>Next of kin details, emergency contact information.</p> <p>Disability information.</p> <p>If you have any addictions, if you have a mental health condition, are affected by domestic violence, if you have recently left prison, or are homeless (this information is optional).</p>	When you require or we offer extra services such as tenancy support, or alterations to your property to support your disability.
3.3.32	Address, postcode, email address, phone number, aids and adaptation information.	When you request an adaptation to your home.
3.3.33	Name, title, address, postcode, contact telephone numbers, email address, tenancy reference number.	<p>When you ask us to keep you up to date with consultations and progress.</p> <p>You can choose whether we contact you by email, post or telephone.</p>
3.3.34	<p>Name, title, address, postcode, telephone number(s), email address, date of birth, main and other languages.</p> <p>To support your application, you may also provide health information, children, criminal convictions, financial information.</p>	When you ask for employment support through Futures Gateways.
3.3.35	Ethnicity, religion, sexuality, disability.	We want to make sure we assess all applications fairly.
3.3.36	Name, address, contact information, financial information.	When you provide a contract or service to us.
3.3.37	Name, contact details, employer and job title (if relevant), gender, ethnicity and	<p>When you visit our premises at:</p> <ul style="list-style-type: none"> <li>• Asher House, Asher Lane Business Park,</li> </ul>

	<p>photograph for entry to our Sky Visitor booking system (Asher Lane only).</p> <p>CCTV images (all premises).</p>	<p>Ripley, Derbyshire, DE5 3SW;</p> <ul style="list-style-type: none"> <li>• Leabrooks depot, Cray's Hill, Alfreton, Derbyshire, DE55 1LN; or</li> <li>• Mountbatten House, Admirals Way, Daventry, Northamptonshire, NN114TF.</li> </ul>
3.3.38	<p>Name, address, email address, phone number(s), information regarding your employment history (e.g. your CV and current employer), details of any unspent convictions, information regarding any disability for which we'll provide special provision at interview stage, employer references.</p> <p>Your account login details (e.g. username and password) will be stored by Networx who manage our careers website.</p>	<p>When you apply for a job with us.</p>
3.3.39	<p>Name, title, address, phone/mobile number, personal email address, NI number, gender, marital status, date of birth, ethnicity, nationality, bank details, details of any past or current medical conditions.</p> <p>Your personal details are held by Cascade, our Cloud service provider, who manage and maintain this system.</p>	<p>When you start working for us, we need to add you to our HR system and put you on the payroll.</p>
3.3.40	<p>Name, title, address, postcode, date of birth, telephone number, email address, partner's name, partner's date of birth, child(ren) name(s), child(ren) date of birth(s).</p>	<p>When you work for us and register with our medical provider.</p>
3.3.41	<p>Name, payroll number (if applicable), email address.</p>	<p>When you work for us and you complete training or development activities.</p>
3.3.42	<p>Name, address, next of kin.</p> <p>The nature of your declaration may also inadvertently reveal further personal information about you such as your sexual orientation, political opinion, religion, etc.</p>	<p>When you work for us, we need to know about any relevant relationships (for example with our tenants, staff members, suppliers) and any paid or unpaid employment outside of</p>



		FHG. This is to protect you as well as the company.
3.3.43	Personal email address, personal mobile number.	When you work for us and you need to access our self-service portal to reset your password.
3.3.44	Name, email address, contact number.	When you work for us and we set you up on systems which may be hosted by an external supplier.
3.3.45	Name, address, tax code, financial information, pension information.	When we need to submit HMRC, pension and enrolment returns.
3.3.46	Name, address, dates resident in property.	When you have moved to a new house, if you have any outstanding utility charges.
3.3.47	Authority to Act or Power of Attorney.	When you ask, or need, someone else to manage your affairs.
3.3.48	National insurance number, tax code.	When we set you up as a supplier or employee.
3.3.49	Name, address, health information.	If you work for us and need occupational health support.
3.3.50	Name, contact details.	When we need to communicate with you.
3.3.51	Photographs of you and/or your family, name, child(ren) name(s) if applicable, telephone number, email address.	When we share case studies or news stories about you. When we create promotional literature, such as reports, publications, commercial and marketing communications.
3.3.52	Name, address, contact details (telephone number, email address).	When you request information on our Limehouse properties available for rent, purchase or shared ownership.
3.3.53	Name, title, date of birth, telephone number(s), email address, NI number, address, postcode, previous addresses, financial information, details of those living at your address (name, relationship to you, date of birth, gender,	When you apply for one of our market tenure properties (shared ownership, rent to buy, market rent, outright sale).

	<p>marital status), landlord references, employment details including payroll or pension number, nationality, credit checks.</p> <p>Supporting documents may also contain photographs of you and any joint applicants.</p>	
3.3.54	<p>Name, company address, position, contact information.</p>	<p>When you register your interest in providing us with a contract or service.</p>
3.3.55	<p>Name, address, contact number(s), email address, date of birth, details of any disabilities or medical information, details of your support needs. This includes special category health data.</p> <p>This is so that we can carry out an assessment and advise you on the best support package for your needs. This information will also be sent through to our third-party monitoring response centre to be used if an alert is raised by you.</p> <p>Details of others that live in your household, name, DOB, relationship to you, any disabilities or medical information. This is in case an alert is raised for another member of your household.</p> <p>Other external agencies that you are receiving support from. This information may also be sent to our third-party monitoring response centre if they may need to contact them on your behalf.</p> <p>NI number (Supporting People funded customers only),</p> <p>Name of account holder and Bank details in order to process your direct debit information for payment of your service.</p> <p>Advocate / Power of Attorney (if applicable) This is when you ask or need someone else to manage your affairs. We will require a form to be held on file for you giving, name, relationship</p>	<p>When you sign up for a Beep Assist support package.</p>

	<p>to you, contact details and what we can discuss with them.</p> <p>Emergency contact information, name, relationship to you, contact details, whether they are a keyholder for you. This is in case we or our third-party monitoring response centre need to contact them when an alert is raised by you.</p> <p>Key safe number. If you have one. This will be held on your third-party monitoring response centre details in case it needs to be given to the emergency services to gain access to your home after an alert has been raised by you.</p> <p>Name, address, contact details in case we need to sign post you to other services that you have asked us to on your behalf.</p> <p>Name, address, contact details if you have made a complaint.</p> <p>Name and photograph where you have consented to media and we share case studies or news stories.</p> <p>Name, address and contact details where you have agreed that we can send you further marketing details about our Beep Assist Service.</p>	
3.3.56	<p>Name, address and contact details. Emergency contact information including, name, relationship to you and contact details. This includes special category health data</p> <p>This is so that the device can be set up for you and if an alert is raised by you, the third-party monitoring response centre is able to access your details and respond to your call.</p>	<p>When you sign up for a Beep Assist support package that contains an Oysta device.</p>

### 3.4 Special Category Data

- 3.4.1 When we collect personal data about you, we may ask for information which is considered sensitive or classed as 'special category data' under data protection laws. This includes information relating to your racial or ethnic origin, physical or mental health, political opinions, religious or philosophical beliefs, trade union membership, your sex life or sexual orientation. Special category data also includes the processing of genetic data or biometric data for the purpose of uniquely identifying a natural person.
- 3.4.2 We will only collect this type of data if you have given us explicit consent, or we have a legal basis for doing so.
- 3.4.3 There may be occasions where inadvertently we identify special category data about you. For example, your ethnicity, religion, sexual orientation or disability may be evident from:
- Photographs;
  - Video footage;
  - Face to face meetings;
  - Statements you provide to us;
  - Declaration of Interests; or
  - Social media
- 3.4.4 Futures Housing Group acknowledges that we need to take extra care of any special category data we hold about you, so we will make sure it is adequately protected and secured in line with data protection requirements.

## 4 [Where do we get your personal data from?](#)

- 4.1 We collect personal information about you from various sources which may include:
- Directly from you;
  - From family members, or those who reside in a property with you or near you;
  - From third parties acting on your behalf;
  - From Futures Housing Group subsidiaries (Futures Homescape Limited, Futures Homeway Limited, Futures Greenscape Limited and Five Doorways Homes Limited);
  - From current and/or previous employers;
  - From current and/or previous landlords;
  - From Futures Housing Group business partners (for example recruitment providers, agencies, contractors);
  - From government bodies including local authorities, law enforcement agencies, social care agencies;
  - From agents acting on our behalf (for example estate agencies, credit agencies);
  - From external funding providers; or
  - From medical practitioners.

4.2 We may collect personal information about you via our website [www.futureshg.co.uk](http://www.futureshg.co.uk), My Account, through online or paper forms, telephone calls, face to face meetings, home visits, email, surveys, affordability calculator, social media or web chat.

## 5 How and why do we use your personal data?

5.1 We only use your personal identifiable information where laws that protect your privacy rights allow us to. This will be when:

- we need to use the information to comply with our legal obligations;
- we need to use the information to perform a contract with you; and/or
- it is fair to use the personal identifiable information either in our interests or someone else's interests, where there is no disadvantage to you – this can include where it is in our interests to contact you about products or services, market to you, or collaborate with others to improve our services;
- we need to seek your consent (if consent is needed) to market to you.

5.2 Where we have your consent, you have the right to withdraw it. We will let you know how to do that at the time we gather your consent. See Section 10 ‘What if I don’t want to provide certain information to you?’ for details about how to withdraw your consent to marketing.

5.3 Certain kinds of personal information that is particularly sensitive. This is information about your health status, racial or ethnic origin, political views, religious or similar beliefs, sex life or sexual orientation, genetic or biometric identifiers, trade union membership or criminal convictions or allegations. We will only use this kind of personal information where:

- we have a legal obligation to do so (for example to protect vulnerable people);
- it is necessary for us to do so to protect your vital interests;
- it is in the substantial public interest;
- it is necessary for the prevention or detection of crime;
- it is necessary for insurance purposes; or
- you have specifically given us ‘affirmative’ consent to use the information;
- it is in the public domain.

5.4 We may use your personal data for the following purposes:

Purpose(s) of data use:		Specifically:	Our lawful basis for doing so:
Managing your tenancy.	5.4.1	To set up and maintain a tenancy agreement with you we require personal information to help us identify you and those living with you. You are responsible for letting	Performance of a contract.

		them know we hold this information. This will enable us to house you appropriately, ensure you are not overcrowded or under-occupying a property and provide you with the service and support you require. We store your information in our housing management system.	
	5.4.2	To ensure we are holding up to date details for you.	Performance of a contract and legal obligation.
	5.4.3	To ensure we have appropriately identified you.	Legal obligation.
	5.4.4	To enable us to create a new tenancy agreement or Section 48 Notice.	Performance of a contract and legal obligation.
	5.4.5	To ensure you have the means to pay the rent.	Legitimate interests (to ensure you can afford rent payments).
	5.4.6	To find out if you have any outstanding repairs.	Performance of a contract.
	5.4.7	To capture any feedback or concerns you may have (we may contact you to help us understand and resolve them).	Performance of a contract.
	5.4.8	To enable us to provide support to you and/or your family we may ask for details on your personal situation and living arrangements.	Performance of a contract.
	5.4.9	To protect you and ensure we deal with the most appropriate person dealing with your affairs we may need to store and hold third party authority or power of attorney	Vital interests.

		information. You are responsible for letting them know we hold this information.	
	5.4.10	To be able to determine affordability and eligibility when selling or letting properties. We can only do this if you supply us with the information we ask for.	Performance of a contract.
	5.4.11	To enable us to carry out essential repairs and maintenance on our properties. This may be because you have asked us to carry out a repair, or because we have identified the need to perform planned or unplanned maintenance work.	Performance of a contract.
	5.4.12	To enable us to respond to a request for an adaptation to your property, we will need certain details about your requirements.	Performance of a contract.
	5.4.13	To enable us to adequately maintain your property, we may install smart devices which will capture relevant information about your property (such as damp, mould and heating efficiency issues) to enable us to act accordingly.	Legitimate interests.
	5.4.14	To enable us to obtain an Energy Performance Certificate (EPC) which is required by law, we may need to pass your contact details onto the company carrying out the assessment.	Legal obligation.
	5.4.15	To enable utility companies to bill you for goods and services provided we will need to send them basic details about yourself such as	Legitimate interests.

		your name, current address, and the dates you lived at your previous property.	
	5.4.16	To enable us to assess your benefit entitlement and council tax, and/or process your application we will need information about your personal and financial circumstances.	Legal obligation.
	5.4.17	To enable us to contact you in respect of an existing or former tenant in order to pursue a debt owed to us.	Legitimate interests.
	5.4.18	To enable us to effectively manage any breaches to your tenancy agreement.	Perform a contract.
	5.4.19	To provide information on properties which may be of interest to you.	Consent.
Recruitment and employment.	5.4.20	To support our recruitment processes, we will need certain information about you and your employment history and experience.	Perform a contract.
	5.4.21	To process employment contracts of successful candidates. If you secure employment with us we will need additional information to that supplied at the recruitment stage (see Section 3 for details).	Perform a contract.
	5.4.22	To process training and development records.	Perform a contract.
	5.4.23	To protect you and the company we need to know about any relevant relationships (for example with our tenants, staff members, suppliers) and any paid or unpaid employment outside of FHG.	Legitimate interests.



	5.4.24	To enable you to register and/or access self-service resources we will need certain identifiable information about you.	Legitimate interests.
	5.4.25	We may monitor and/or record employees' electronic communications or data for the purposes set out in the Regulation of Investigatory Powers Act (2000).	Legitimate interests.
	5.4.26	To enable you to perform your job role we will need certain identifiable data about you to set you up on IT systems. These systems may be hosted by an externally contracted supplier.	Legitimate interests.
Security and safety.	5.4.27	For the prevention and detection of crime. This may be through use of CCTV image recording, or as a result of an investigation or review.	Legal obligation. Legitimate interests.
	5.4.28	To record and identify all visitors to our premises for the purposes of security and Health & Safety.	Legitimate interests.
	5.4.29	To record and respond to cases of anti-social behaviour. We will investigate reports of anti-social behaviour by completing an initial risk assessment, interview the informant and/or other household members, talk to perpetrators and utilise noise monitoring equipment if relevant. Where the case relates to an act of criminality, we will encourage the informant to contact the police, or we may contact the police on their behalf. Case information may be recorded	Vital interests. Legal obligation.

		on the E-CINS (Empowering Communities Inclusion & Neighbourhood-management System) database which is shared with relevant partner agencies, such as local authorities and police. This may include details of conversations, letters, enforcement notices and other evidence relating to the case.	
	5.4.30	To ensure we can assist you if you need emergency help or assistance, we may need to contact your next of kin. You are responsible for letting them know we are using their information for this purpose.	Vital interests.
	5.4.31	To ensure the safety and security of Futures Housing Group staff or contractors, we will record any instances of unacceptable behaviour. Where violent/threatening incidents occur, as a minimum we will visit your property in pairs. In these instances, we will write to you to let you know the reasons why. We will also share this with contractors working on your property if required.	Legitimate interests.
Customer service and complaint resolution.	5.4.32	For customer research purposes we may contact you to check you are happy with the service you have received. This is so we can address any issues and improve our customer service.	Legitimate interests.
	5.4.33	To effectively deal with complaints. In addition to collecting your name and contact details, we may need to ask you for further information to assist us in investigating and resolving	Perform a contract.

		your complaint. We will only ask you for information which is relevant to your complaint.	
	5.4.34	To enable you to conveniently self-serve through the My Account portal you will be asked to supply personal information when you register. This will enable you to check/update your personal details, view your rent account statement, and book/manage repairs.	Perform a contract.
	5.4.35	To offer money advice we will need certain details about your personal and financial situation. We will only provide you with advice if you ask for it.	Consent from the data subject.
	5.4.36	To enable you to share feedback and concerns with us, so we can satisfactorily resolve them where appropriate.	Perform a contract.
	5.4.37	To enable us to review and continually improve our service and product offerings, we may ask if you'd like to be involved in videos for research purposes; for example, we may wish to take videos of you using our services.  This is entirely voluntary and will not be done without your explicit consent, from which you can withdraw at any time.	Consent from the data subject.
	5.4.38	We may record calls for training purposes and to shape continuous improvement.	Legitimate interests.
Financial purposes.	5.4.39	To enable us to process payments, including making sure you pay the correct amount of tax, we may need	Perform a contract.

		banking details, card details and other financial information from you.	
Keeping you up to date.	5.4.40	To enable us to provide you with useful and important information relating to your tenancy, employment, or contract with us.	Legitimate interests.
	5.4.41	To enable us to share information about our products and services or send you other marketing communications.	Consent. Legitimate interests.
	5.4.42	To enable us to share case studies or news stories about you.	Consent.
	5.4.43	To enable us to create effective promotional, marketing and/or commercial publications.	Legitimate interests.
	5.4.44	To enable us to keep you up to date on consultations and progress.	Legitimate interests.
Legal, statutory and contractual obligations.	5.4.45	To meet the requirements of our regulator and assist us in meeting our statutory obligations we may need to process some of your personal information.	Legal obligation.
	5.4.46	To fulfil our contractual obligations, we will need details including your name, company address, contact details and financial/banking information.	Perform a contract.
	5.4.47	To comply with Health and Safety regulations we will need to collect information relating to your health and medical conditions, where appropriate.	Legal obligation.

	5.4.48	For analysis purposes and to produce equality and diversity statistical information, we may hold and use some special category data such as your ethnicity, religion or sexual orientation.	Legitimate interests.
	5.4.49	To enable us to register you for tender opportunities on our contractor portal.	Perform a contract.
	5.4.50	To fulfil our legal obligations as a landlord under prevailing gas safety regulations we collect and use information about you and your property to keep you and your family safe.	Legal obligation.
	5.4.51	To notify you about changes to our terms or updates to our Privacy Notice.	Legal obligation.
Research	5.4.52	To use data analytics to improve our website, products/services, customer relationships and experiences.	Legitimate interests.
	5.4.53	To ask you to leave a review, take a survey or participate in a research initiative (either online, by telephone or in person) so that we may trial new initiatives and improve our customer service and support.	Legitimate interests.
General.	5.4.54	To process any of the personal data we hold, we may choose to use software robots instead of human beings. They are programmed to perform designated tasks which mirror those carried out by humans, to improve efficiency and data integrity.	Legitimate interests.

Other Services	5.4.55	To enable us to provide you with a Beep Assist package of support; or to provide you with a Beep Assist package of support that includes an Oysta device. We need to collect information from you which includes contact information for yourself and nominated emergency contacts, and relevant medical information. This will enable us to provide you with the support you need.	Perform a contract.
----------------	--------	---	---------------------

5.5 We may also need to use your information to assist with the delivery of audit and assurance reviews, assist us with fraud investigations and comply with other legal requirements.

## 6 How we protect your personal data

- 6.1 All personal information you provide to us is stored on our secure servers within the UK. However there may be occasions where your information may need to be stored in or sent to companies, service providers, agents, subcontractors and regulatory authorities in countries outside of the European Economic Area ('EEA') which may not have the same level of security and protection as we have under UK legislation. If we have to do this, we will make sure that suitable security measures are in place.
- 6.2 Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. You must not share a password with anyone.
- 6.3 We take data security matters on our customers' information very seriously. With this in mind we treat your data with care and take a best practice approach to protect it wherever possible.
- 6.4 We secure all of our websites using 'https' technology and we regularly monitor our systems for possible vulnerabilities, threats and attacks to ensure your data remains protected. We also carry out vulnerability and penetration testing on a regular basis to identify emerging threats to further strengthen security.
- 6.5 Futures Housing Group is a Payment Card Industry Data Security Standard (PCI-DSS) compliant organisation. This means that we adhere to high security standards in order to protect your payment card details when you are providing us with this information.
- 6.6 We will only keep your personal information for as long as we need it to fulfil the purposes set out in this Privacy Notice, or as required by law. This might be for as

long as you have a relationship with us, or longer where we need it for legitimate reasons such as legal, tax or regulatory purposes.

## 7 Social media

- 7.1 We work with third parties, including social network sites like Facebook, Twitter and YouTube. We use them to keep you updated on our products and services, share news stories and videos and to offer alternative ways for you to contact us.
- 7.2 All of these companies operate Third Party Sites. We cannot control how your data is collected, stored, used or shared by these Third-Party Sites or to whom it is disclosed. Please be sure to review the privacy policies and privacy settings on your social networking sites to make sure you understand the information they are sharing. If you do not want a Third-Party Site to share information about you, you must contact that site and determine whether it gives you the opportunity to opt-out of sharing such information. Futures Housing Group Limited is not responsible for how these Third-Party Sites may use information collected from or about you.
- 7.3 Social media posts on the Futures Housing group website are publicly available and therefore you should not submit personal information about yourself using these channels. If you decide to use social media to contact us, you accept full responsibility for the security and use of the data provided. Any private messages sent using social media will only be stored for the duration of dealing with your enquiry and any information provided will not be used for any other purposes than customer support.

## 8 Sharing your personal data

- 8.1 Futures Housing Group may share the information it collects about you with other companies within the Group. It may also be disclosed to third parties in the following instances:
- if we are under a duty to disclose or share your personal data in order to comply with a legal obligation;
  - if we believe disclosure is necessary to protect the rights, property, or safety of Futures Housing Group, its customers, employees, or others;
  - in order to undertake fraud investigations or respond to a law enforcement request; or
  - when dealing with cases of anti-social behavior.
- 8.2 We will not sell your personal data onto third parties for marketing purposes.
- 8.3 We may share your information with the following groups:
- regulatory bodies
  - government agencies
  - local authorities
  - police or other law enforcement agencies

- Her Majesty's Court Service
- credit reference agencies
- social services
- internal and external auditors
- recruitment agencies that we work in partnership with
- our legal advisors
- awarding bodies
- assessors
- pension providers
- occupational health providers
- training and development providers
- software and system providers
- banks and other financial institutions
- social media (see Section 7 for more details)
- research agencies
- monitoring response centre (providing 24-hour service and support when you raise an alert)
- emergency contacts and people you have authorised us to share your data with
- Advocate / Power of Attorney
- our insurers
- debt collection agencies
- mediation and advocacy partner organisations
- other external agencies that support you. There may be occasions when it would be beneficial for us to contact other agencies on your behalf. We will only speak to them about matters that concern your health and/or care and/or support. It may be necessary to share information that we hold about you with other agencies to maximise a positive outcome.

8.4 For a full list of third parties working in partnership with Futures Housing Group, please click here <https://futureshg.co.uk/wp-content/uploads/2018/05/contractors.pdf>

## 9 Use of Google Analytics and Cookies

9.1 We use Google Analytics to collect anonymous information about use of our website. Google Analytics collects information such as how often users visit this site, what pages they visit when they do so and what other sites they used prior to coming to this site. We use the information we get from Google Analytics only to improve our website.

9.2 Although Google Analytics places a permanent cookie on your web browser to identify you as a unique user next time you visit our website, the cookie cannot be used by anyone but Google whose ability to use and share information collected by Google Analytics about your visits to this site is restricted by the Google Analytics Terms of Use and the Google Privacy Policy.



9.3 Google Analytics uses cookies to define user sessions, which allows for the collection of data about how visitors are using the websites. First Party Cookies are used which means that the cookies are linked to a specific website domain and Google Analytics will only use that cookie for statistical analysis related to your browsing behaviour on that specific website.

9.4 If you wish to, you can opt out by turning off cookies in the preferences settings in your web browser or you can use Google's opt out tool within Chrome.

## 10 What if you don't want to provide certain information to us?

10.1 We will be unable to provide you with products or services if you do not let us have certain pieces of personal information. But we'll only ask you for what we really need.

10.2 In some cases providing personal information is optional, for example providing your contact details to receive marketing communications. We will make it explicitly clear if this is the case, so you can decide if you want to opt in or not. If you change your mind and decide you don't want to receive marketing communications any more, you can let us know by emailing [communications@futureshg.co.uk](mailto:communications@futureshg.co.uk)

## 11 What are your rights under data protection laws?

11.1 From the 25 May 2018 you will have eight rights relating to the use and storage of your personal identifiable information. These are:

- The right to be informed.
- The right of access.
- The right to rectification.
- The right to erasure.
- The right to restrict processing.
- The right to data portability.
- The right to object.
- Rights in relation to automated decision making and profiling.

11.2 In brief, you have the right to be informed who is obtaining and using your personal information, how this information will be retained, shared and secured and what lawful grounds will be used to obtain and use it. You have the right to object to how we use your personal information in certain circumstances. You also have the right to obtain a copy of the personal information we hold about you. You can find out how to do this in Section 12.

11.3 In addition, you can ask the Group to correct inaccuracies and in some circumstances delete or restrict personal information or to provide some of your personal information to someone else. You can make a complaint if you feel we are using your information unlawfully and/or holding inaccurate, inadequate or irrelevant

information which if used may have a detrimental impact on you and/or has an impact on your rights.

- 11.4 If you wish to exercise any of your rights or have a complaint on the way your personal information is handled, please contact [dataprotection@futureshg.co.uk](mailto:dataprotection@futureshg.co.uk) or write to the Data Protection Manager at Asher House, Asher Lane Business Park, Ripley, Derbyshire, DE5 3SW.
- 11.5 If you are not happy with the way we deal with any complaint relating to the way we use your personal information you can refer it to the data protection supervisory authority. In the UK, this is the Information Commissioner's Office, at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns)

## 12 Requesting access to your personal data

- 12.1 You have the right to request access to the personal data we hold about you.
- 12.2 If you would like to request a copy of your personal data, you can do so through our website <https://futureshg.co.uk/contact-us/enquiry-form/> selecting the drop-down option 'I want to request access to personal information FHG holds about me'.
- 12.3 Alternatively you can contact us via letter, email, telephone or social media.

## 13 What should you do if your personal information changes?

- 13.1 If any of your personal information changes, such as a contact number or email address, please let us know right away so we can update our records.
- 13.2 For certain changes, such as a change of name, we will ask you to provide further details such as copy of a marriage certificate or deed poll.

## 14 Updates to our Privacy Notice

- 14.1 Our Privacy Notice will be regularly reviewed to ensure it accurately reflects how your personal information is being used. As it may change at any time in the future, we encourage you to check this Privacy Notice whenever you visit our website [www.futureshg.co.uk/privacy](http://www.futureshg.co.uk/privacy)

## 15 Who do I contact about data protection queries?

- 15.1 The Group has appointed a Mandatory Data Protection Officer (MDPO). If you have any questions, comments or concerns about this Privacy Notice or the way in which your personal data is being handled, you can email them at [dataprotection@futureshg.co.uk](mailto:dataprotection@futureshg.co.uk) or by writing to The Data Protection Manager,



Futures Housing Group, Asher House, Asher Lane Business Park, Ripley,  
Derbyshire, DE5 3SW.