



Customer Privacy Notice

UK General Data Protection Regulation (UK GDPR)

The UK General Data Protection Regulation states that every company handling personal information must tell people how the personal information they collect is used and give people more control over this.

The Pivotal Commitment

This statement explains how we will collect and use customer information to provide and deliver housing and support related services. We will not collect information we do not need or will not use. We are committed to protecting customer privacy by securely storing and appropriately handling any information we collect which identifies a customer.

About Pivotal

We provide sustainable homes, specialised support and compassionate care with services tailored to individual needs.

Why we collect customer information

We collect and use information provided to us so that we can:

- understand our customers' needs and assess the suitability of Pivotal services in meeting them, and ensuring they continue to meet them. This could be for the provision of housing management services or support;
- enable us to deliver housing, support, health and social care in line with contractual requirements, including risk mitigation and to create and develop support plans;
- monitor our performance and service quality and meet our service improvement aims. This will include carrying out surveys in a variety of ways e.g., email, phone, text and/or face to face;
- provide you with advice and support you may need with claiming benefits, budgeting, improving your skills and general independent living;
- meet our legal obligations to provide repairs and maintenance services;
- with your permission, collect photos, videos, case studies and news articles to use publicly to promote our service.

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You can:

- limit the way we use your personal data, ask us to delete it if there is no reason for us to keep it and change your mind, withdrawing consent for us to use it;
- ask us to correct any inaccurate or incomplete personal information and ask us to send it to you if you want to use it for something else;
- object to us processing your personal data e.g., for marketing purposes.

The information we will collect

When you apply to Pivotal

When you apply to Pivotal, we will ask you to provide information in the following ways:

- On an application form
- On other supplementary information forms if this is needed
- During initial meetings with We
- By telephone
- Within their electronic or written communications with We

As part of the application process, we will ask you for the following information:

- Your name, date of birth and personal contact details
- Your National Insurance number
- Your language preferences and communication needs
- The gender you identify as
- The ethnicity you describe yourself as belonging to
- Your religious beliefs
- Information on whether anyone acts on your behalf and whether you have capacity
- Your income and financial health
- Any cautions or unspent convictions you may have
- Your housing history, including any arrears or debts you may owe
- Relevant details of your family, including your marital status, whether you have any children or whether you are pregnant
- Details in relation to your health
- Other relevant details of your personal life and any care or support requirements you may have

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As part of the application process, we will use the information:

- fairly and openly for the purpose of understanding your housing, care and support requirements and assessing the suitability of Pivotal services to meet them;
- to ensure that Pivotal services are fair and accessible to all.

When you become a Pivotal customer receiving services from Us

When you become our customer, we will collect the following information from you:

- Email addresses and phone numbers
- Payments made by you for rent or service charges and details of any arrears
- Any contact or correspondence that you have with Pivotal
- Information relating to risk, support, health issues and disabilities
- Photos, articles and promotional materials, subject to you giving permission.

We will also collect the following information to help us to support you in managing your tenancy or license and to provide you with our housing and support services:

- The contact details of your next of kin, relatives and other named contacts.
- Images of you to assist us to co-ordinate and personalise your support.
- Details in relation to your housing or support requirements, including progress against your personalised outcomes.
- Details in relation to your well-being, physical, and mental health.
- Details of your contact and interactions with us in person, by telephone and in electronic and written communications.
- Information provided by third parties in relation to complaints or anti-social behaviour that is relevant to your support, risk management or tenancy sustainment.
- Financial records about payments relating to the housing and services you receive from us, any outstanding amounts and associated recovery action.
- Information about any repairs and maintenance requirements during the time when we provide services for you.

As a Pivotal customer, we will use the personal information you provide during the application stage and subsequently in face-to-face meetings and other interactions with you e.g., phone calls, electronic or written communications:

- fairly and openly to support you in managing your tenancy, license agreement and support needs and to provide you with our services;
- to understand your personal situation and individual requirements so we can provide a tailored service that meets any cultural, financial, learning, mental or physical needs that you may have;

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- for risk management purposes;
- to improve the services you receive from us;
- to investigate issues, disputes and complaints between us, you and other customers and to seek to resolve them.

Securely storing, using and deleting your personal information

Your information will be stored and used by us in accordance with this privacy statement and also in accordance with customer rights under the Data Protection Act 2018 and UK GDPR and the UK General Data Protection Regulations. Our security measures and procedures reflect the seriousness with which we approach security and the value we attach to your information so:

- the information that you provide will be uploaded and stored securely on our systems and any forms you complete will be shredded in line with the data retention schedule set out in our Data Protection Policy. Only relevant colleagues will access the information you provide to us;
- in limited circumstances, we may use your information for a purpose other than those set out in this notice. If we intend to do so, we will inform you of this and request your permission;
- at the point that accommodation or a service is offered, if you decide not to take it up, we will hold your personal information for 6 months after your last contact with us, then securely destroy it;
- whilst you are a customer of ours, for set periods of time in line with legal requirements, best practice and any follow-up connection/communication as deemed necessary, we will hold the information collected by us;
- normally, we will retain your support and service user records for 6 years after our relationship ends. However, in some cases these may be retained for longer or shorter periods. When the relevant set period has ended, unless there is another identifiable reason to retain your information, we will delete it.

How we will share your data within Pivotal

Pivotal is made up of a number of related companies. We will share your information with other parts of the group where necessary in order to best provide services to you in accordance with our contractual obligations.

Your information will only be provided to other companies within Pivotal where it is necessary to do this in order to provide services to you in accordance with our contract. The obligations, as set out in this notice, shall apply to all members of the Pivotal group.

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Sharing information with other organisations

We will only share your information where we have a lawful basis to do so, such as where sharing is necessary to provide services, comply with the law, protect vital interests, or where you have given consent for a specific purpose.

We will share information about you with other organisations:

- where this is necessary to help us deliver our services to you;
- as required by our regulators e.g., the Regulator of Social Housing who is permitted access to this information by law, and with other organisations where we have a legal obligation to share the information with them e.g., HM Court Services;
- our contractors and sub-contractors shall be contractually required to ensure that they adhere to the security requirements imposed by the Data Protection Act 2018 and UK GDPR and/or the General Data Protection Regulation (as applicable).

We will, from time to time and only as necessary, share your information with the organisations below:

- Utility companies
- The police for the purpose of the detection and prevention of crime
- Organisations with a function of auditing and/or administering public funds for the purpose of detection and prevention of fraud
- Local Authority teams such as social services, environmental health, council and revenue departments and benefit agencies
- NHS and GP Services
- National Probation Service
- Adult Social Care services
- Commissioners and other social and care services
- Their solicitors/legal representatives

Equal Opportunities Monitoring

For equal opportunities monitoring, and only with your consent, we may also collect information about your:

- race and ethnicity;
- sex;
- political opinions;
- religious, spiritual or philosophical beliefs;
- genetic or biometric data;
- data concerning health;
- sexual orientation.

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The legal basis for using your information

There are a number of legal reasons why we need to collect and use your personal information. The UK GDPR and the Data Protection Act 2018 state that we must have a reason to collect and use your information. Reasons may include one or more of the following:

- To deliver services and support you
- To provide accommodation
- To enable us to manage the services we provide
- To train and manage our colleagues who deliver those services
- To investigate any concerns or complaints you have about our services
- To check the quality of our services
- To help with the research and planning of new services

Special category data

To best provide our services to you, we collect and use sensitive personal data called “special category data”. This may be information you would not want to be widely known and is very personal to you e.g., information about your physical or mental health or any criminal history. We will always keep it securely. The following basis for collecting and using this information applies:

- **Contract:** The processing of data is necessary for a contract we have with an individual, or because you have asked us to take specific steps before entering into a contract.
- **Vital interests:** The processing of data may be necessary to protect someone’s life or protect them from significant harm.
- **Legal obligation:** It is required by law – Health & Safety Act, Housing Acts, Crime & Disorder Act 1998, Anti-Social Behaviour, Crime & Policing Act 2014; Housing Act 1998, Homelessness Reduction Act 2017.
- **Legitimate interests:** The processing is necessary for our legitimate interests, or the legitimate interests of a third party, unless there is a good reason to protect your personal data that overrides those legitimate interests.
- **Consent:** you have given us clear consent to process your personal data for a specific purpose e.g., use of a case study, article or image of you.

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Pivotal Website

The Pivotal website uses cookies to give you the best experience of our website. For further information, see the cookie policy on our website.

Closed Circuit Television (CCTV)

Pivotal uses CCTV at some of our locations. Where CCTV is in operation, there will be signs clearly visible to indicate that this type of recording is taking place. CCTV is only used in public/communal areas and within our offices.

Your Rights

We will tell you how your data is used and, from time to time, ask you if the data we hold is accurate so that we can amend it if necessary and ensure it is up to date.

In respect of the information we hold about you, you have the right to ask us:

- for access to the information;
- to rectify the information where it is inaccurate or is incomplete;
- for the information to be blocked, erased or destroyed;
- to erase the information that is used on the basis of your consent and take steps to ask others who we have shared your information with to also erase it. There is a right to erasure request form here <https://gdpr.eu/wp-content/uploads/2019/01/RIGHT-TO-ERASURE-REQUEST-FORM.pdf>;
- to limit what we do with your information;
- to stop using it.

You also have the right to data portability, allowing you to request that we provide your personal data to you or another organisation in a structured, commonly used, machine-readable format, where this applies.

Our obligations to comply with the above rights are subject to certain exemptions as outlined on the ICO website <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/exemptions/>.

Where we are using your information because you have provided your consent, you are entitled to withdraw your consent at any time. The lawfulness of our use of your information before consent was withdrawn is not affected.

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To exercise any of the rights referred to above, customers should contact Pivotal, CJ House, 9 Central Business Park, Southcote Road, Bournemouth, Dorset, BH1 3SJ, phone 01202 306070 or use the 'Contact Us' page on our website at www.wehomes.co.uk/contact-us/.

The Pivotal Data Protection Officer is Suzanne Smith, Director of People. She can be contacted at CJ House, 9 Central Business Park, Southcote Road, Bournemouth, Dorset, BH1 3SJ.

You also have the right to complain to the Information Commissioner's Office (ICO) if you are not satisfied with the way we use your information. You can contact the ICO by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, via their website at www.ico.org.uk or by telephone on 0303 123 1113.

Data Control and Processing

Pivotal Group Holdings Ltd is a registered data controller and data processor for the personal information you provide to us.

Pivotal Group Holdings Ltd

Company number: 11764780

Registered address: Ebenezer House, 5a Poole Rd, Bournemouth, Dorset, BH2 5QJ.

Head Office: CJ House, 9 Central Business Park, Southcote Road, Bournemouth, Dorset, BH1 3SJ.

Data processor reference number: ZA563989

Legal basis clarification:

We rely on the following lawful bases under UK GDPR:

- Contract: to provide housing and support services.
- Legal obligation: to meet statutory housing, safeguarding, health and safety and regulatory duties.
- Vital interests: to protect life or prevent serious harm.
- Legitimate interests: for service improvement, complaints handling and quality monitoring, where your rights do not override these interests.
- Consent: for optional activities such as publicity, case studies, photographs or videos.

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