## **Privacy Matters at Latimer**

Latimer by Clarion Housing Group (the sales branding name for Latimer Developments Limited and Clarion Housing Association Limited which are both part of the Clarion Housing Group(Clarion)), needs to process personal data in order to deliver our services to you as applicable:

- To develop, market, log interest and sell shared ownership and private properties and to manage our website
- To manage the staircasing process (purchasing further percentages of shared ownership properties)
- To deliver on our Group ambition to 'transform lives and communities'

We are committed to treating your information securely, with respect and in line with data protection law. You can access our full privacy notice on our website (www.latimerhomes.com), or ask us to send you a copy.



### **Recording personal information about you**

Most information we hold will be collected from you but we may also obtain this from third parties such as property or help to buy agents, the local authority, legal professionals and financial advisors. We will always tell you why we need your information and how we'll use it. We will only ask you for information that is relevant and necessary to the delivery of our services. Information we hold about you will vary dependent on the services we provide to you. For example if we're collecting interest in a development, we will need your contact details and property requirements. If this development was only available to key workers, we would need to collect information about your employment.

We may apply markers to your information (for example, in relation to access requirements) to enable us to tailor and deliver services to you.

We may also create new data through profiling and automated decision making e.g. where we use systems to check if you are eligible for a service. Where this may have a legal or similar effect on you, you can object to this if you wish, further detail is available on our website.

## **Information sharing**

Sometimes we need to share your information with other organisations that we work with or who provide services on our behalf. We will only share relevant details and we will ensure your information remains secure.

We may need to share information in order to provide services under contract (e.g. sharing your contact details with maintenance contractors during a defects period), or where it is in our 'legitimate interests' (e.g. telling utility companies that you've moved in and have responsibility for the bills). In these circumstances, we don't need to ask for your consent. You have the right to object to processing based on 'legitimate interests'.

The law also permits us to share information to meet our legal or regulatory obligations, (for example around health and safety and diversity and inclusion) in connection with legal proceedings, where requested by police and other relevant agencies or where subject to a court order.

When the information we need to share is defined as 'special category' (e.g. information about health, or ethnicity) we will do so:

- with your consent or where you have made the information public;
- where we need to protect the vital interests (i.e. the health and safety) of you or another person
- where we or another person needs to bring or defend legal claims
- we are required by law or for substantial interest grounds.

Turn over for more examples of where we may need to share your information. Full details are available in our website privacy notice, including how we contribute to the work of the National Fraud Initiative (NFI).

## Verification of Identity

We might need to ask you for proof of identity where this is necessary for the delivery of our services. For example, to ensure eligibility for a property or if you make a Subject Access Request. We will also carry out appropriate security checks to verify your identity when we communicate with you or your representatives on the telephone.

## Accurate and Up to Date

Please tell us if your information changes so we can keep it up to date. For example if you change your contact details (mobile number and email address), or if your circumstances change (e.g. a change in household members if relevant to your service). We won't keep your information longer than we need to. Our Data Retention Schedule outlines how long information is kept – you can see more about this on our website.

#### **Communicating with you**

We will use your contact details to respond to your enquiries and send you information about your lease, property sale or staircasing application. We will also communicate with you about any properties and developments you have expressed an interest in as well as other properties in the geographical area that you may be interested in or eligible for. We will also send you news and information about Latimer and companies within the Clarion Housing Group and the broad range of services we think you could benefit from, for example advice on energy saving.

You can manage your communication preferences regarding our promotional messages by clicking 'unsubscribe' on emails or emailing latimer.emailtracking@clarionhg.com.

Latimer uses tracking on our property marketing emails and service messages. This enables us to see if you open emails and click on links to visit our website and if so, how long you spend on different pages, so we can learn what is of interest to you in order to make our content more relevant and improve how quickly you can find the information you need to save you time. You can opt out of email tracking by following the simple instructions on our tracked emails or you can email latimer.emailtracking@clarionhg.com. We do not track 1 to 1 email communications, for example, between you and a Customer Journey Sales Executive. We will never sell your details to 3rd parties for their marketing purposes.

## **Your Rights**

You can ask for a copy of the personal information we hold about you. This is known as a Subject Access Request (SAR). You can also request information to be corrected, erased or transferred to another organisation. The best way to request this is to put your request in writing and include a copy of proof of address and valid ID. Further details outlining all of your rights in relation to your personal data are available on our website.

## Examples of where we may need to share your information

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Statutory Bodies such as Legal and Government organisations	<ul> <li>Local Authorities e.g. Council Tax</li> <li>DWP</li> <li>Our regulators including Regulator of Social Housing, Charity Commission, Financial Conduct Authority, Homes England, Greater London Authority, Charity Commission</li> </ul>
The Police and others within the criminal justice system	<ul> <li>Probation</li> <li>HM Prison Service</li> <li>Youth Offending Teams.</li> </ul>
Non-legal organisations	<ul> <li>Other Housing Associations and landlords</li> <li>Insurers and the NHBC</li> <li>Banks</li> <li>Utility companies, e.g. gas and electricity providers</li> <li>Credit reference agencies &amp; debt collection agencies.</li> </ul>
Your representatives	<ul> <li>A nominated friend, family member or solicitor</li> <li>Local Councillor or MP</li> <li>Medical Professionals or legally appointed representatives.</li> </ul>
Persons or organisations associated with Latimer and Clarion Housing Group	<ul> <li>Other companies within the Clarion Housing Group</li> <li>Maintenance contractors</li> <li>Other companies acting as an agent for Latimer or Clarion Housing Group and/or its operating companies e.g. companies employed by us to carry out satisfaction surveys.</li> </ul>

## **Contact us:**

dataprotection@clarionhg.com

The Data Protection Team Clarion Housing Group Level 6, 6, More London Place Tooley Street SE1 2DA

privatesales@latimerhomes.com

Latimer by Clarion Housing Group is the sales branding name for Latimer Developments Limited and Clarion Housing Association Limited, both of which are subsidiaries of Clarion Housing Group Limited.

Clarion Housing Group includes a number of other subsidiary organisations such as Grange and Clarion Futures. Please see our website for further information

# **Further information**

The Information Commissioner (ICO) is also a source of further information about your data protection rights. The ICO is an independent official body. Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF, 0303 123 1113, www.ico.org.uk