

PRIVACY POLICY (WEBSITE)

What is the purpose of this privacy notice:

Six Town Housing is an Arm's Length Management Organisation who manage the Council Housing Stock on behalf of Bury Council. Six Town Housing is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We protect any personal information you give us while you are using our website. This privacy policy tells you what to expect when we collect personal information from visitors to our website.

Important information about us:

We provide a wide range of housing related services from rent collection, repairs and tenancy management through to money advice, supporting vulnerable customers and assisting people back into work.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out in the "Contact Us" section below.

What personal information we collect:

We may collect, store and use the following types of personal information from visitors to our website:

- **Identity data** – this names, usernames or similar identifier, marital status, title, date of birth and gender;
- **Contact Data** - includes billing address, delivery address, email address and telephone numbers;
- **Financial Data** - includes bank account and payment card details;
- **Transaction Data** - includes details about payments to and from you and other details of products and services you have purchased from us;
- **Technical Data** - includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website;
- **Profile Data** - includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses;
- **Usage Data** - includes information about how you use our website, products and services;
- **Marketing and Communications Data** - includes your preferences in receiving marketing from us.

How we collect personal information:

We use different methods to collect your personal information. These include:

- **Direct interaction with you** – You may give us your identity, contact and financial data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you apply for our services, create an

account on our website, request marketing materials be sent to you, enter a competition, promotion or survey, or give us some feedback; and

- **Automated technology or interaction** - As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.
- The website also uses Tawk (live chat) and Browsealoud (which enables users to translate pages, or read them out aloud). Both are third party apps embedded within the website.

How we use personal information:

We will only use your personal information when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Communicating with you about your tenancy;
- Letting, renting and leasing properties;
- Administering waiting lists;
- Carrying out research;
- Administering housing and property grants;
- Providing associated welfare services, advice and support;
- Maintaining our accounts and records;
- Carry out improvement works as part of a planned programme;
- To take payments for any service charges and other non-rent activities;
- To deliver repairs and other works to your home and any communal areas;
- To deal with anti-social behaviour complaints;
- To contact you to seek feedback on services provided to you and your contract with us;
- To take any action on a breach of tenancy;
- To recover any debt owed to us;
- To process any application from you to exercise your Right to Buy or your Right to Acquire;
- Using any CCTV information for the purposes of public safety and the prevention and investigation of crime;
- Where we have your consent, which you can withdraw at any time, we may use your image in publicity material;
- Supporting and managing our employees, agents, and contractors;
- As part of our marketing and promotional activities (if you agree);
- Where we need to perform the contract we are about to enter into or have entered into with you;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; and
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time.

Analysing visits to our website:

When someone visits www.sixtownhousing.org we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

Use of cookies:

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

There are different types of cookies – Session, Persistent and First and Third Party Cookies. Please visit www.allaboutcookies.org or <https://ico.org.uk/for-the-public/online/cookies/for> more information about cookies, including how to see what cookies have been set and how to manage and delete them.

We do not use cookies for collecting user information from the site. Six Town Housing only monitor the IP addresses of visitors to assess which pages are the most popular. These IP addresses are not linked to any personal data so all visitors to our site remain anonymous.

The Six Town Housing website uses the following cookies:

| Item: | Cookies: | Type of Cookie and Purpose: | More information: |
|-------------------------|--|--|---|
| PHPSESSID | PHPSESSID | Session Cookies - Our website uses PHP session cookies to help you to navigate it. These cookies expire once you shut the browser window or end the browser session. | |
| Google Analytics | gat_UA-9239814-1 _gid _ga _utma | Third Party Cookies* – These cookies collect information about how visitors use our website. We use the information to compile reports and to help us improve the site. | Google Analytics Privacy Policy. You can also click on this link if you want to opt out of Google Analytics. |

| | | | |
|---------------------------------------|---|--|-----------------------------------|
| | __utmz* __utmc | The cookies collect information in an anonymous form, including the number of visitors to our website, where our visitors to our website have come from and the pages they have visited. The information obtained does not identify anyone. | |
| Visual Website Optimiser (VWO) | __vwo_ds __vis_opt_test_cookie __vwo_uuid_v2 __vwo_uuid* | Third Party Cookies* – These cookies collect information about how visitors interact with the pages on the website. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form. The information obtained does not identify anyone. | VWO Cookie Policy |

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

Our search engine:

Search queries and results are logged anonymously to help us improve our website and search functionality. No user-specific information is collected by us or any third party.

E-newsletters and marketing:

Where you have consented for us to do so, we may send you e-newsletters to tell you about important information affecting you as a customer or alerting you to an event or issue you may be interested in. You can unsubscribe to these newsletters by clicking on the 'unsubscribe' button which appears at the bottom of the email at any time.

We use a third party provider, Campaign Monitor to deliver our monthly e-newsletter. We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our e-newsletter.

Security:

We hold all our data in a secure data centre and access to data is strictly controlled and monitored. Our systems are regularly audited and tested to make sure that we are following procedures and to detect and address potential security risks.

How long we keep personal information:

We do not hold any personal data longer than necessary, having considered the purposes for processing. Our Record Management Schedule lists the length of time we keep information for.

A copy of our Record Management Schedule is available upon request.

Your right to access personal information:

You can find out if we hold any personal information about you by making a 'subject access request' under the General Data Protection Regulation (EU) 2016/679. If we do hold information about you, we will:

- Give you a description of it;
- Tell you why we are holding;
- Tell you who it has been disclosed to; and
- Let you have a copy of the information in an intelligible form.

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

You can request access to the information we hold about you at any time by contacting us (please see contact details section below). Please mark your request for the attention of our Data Protection Officer.

Your rights:

If you believe that any of the personal information we hold about you is incorrect, you have the right to ask us to rectify that information at any time.

You may also have the right, in certain circumstances, to request that we delete your personal information, to block any further processing of your personal information or to object to the processing of your personal information. There are some specific circumstances where these rights do not apply and we can refuse to deal with your request.

If we are processing your personal information based upon your consent (e.g. as part of our marketing or promotional activities or to make a voluntary referral to an external agency), you have the right to withdraw your consent at any time.

If you require any further information about your right to rectification, erasure, restriction of or object to processing or you wish to withdraw your consent please contact us (please see contact details section below).

Complaints:

We take any complaints we receive about the collection and use of personal information very seriously. We would encourage you to bring it to our attention if you think that our collection



or use of information is unfair, misleading or inappropriate. You can make a complaint at any time by contacting us (see contact details section below).

If you think our collection or use of personal information is unfair, misleading or inappropriate or if you have concerns about the security of your personal information, you also have the right to make a complaint to the Information Commissioner's Office. You can contact the Information Commissioner's Office at the following address:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Contact us:

You can e-mail us at enquiries@sixtownhousing.org or write to us at the following address:

Six Town Housing, 6 Knowsley Place, Angouleme Way, Bury, BL9 0EL.

We have appointed a Data Protection Officer to oversee our compliance with this privacy notice. Our Data Protection Officer is Claire Rybczynski. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO using the details above.