

Touchstone Privacy Notice

Touchstone is committed to protecting your privacy when you use our services.

The Privacy Notice below explains how we use information about you and how we protect your privacy to comply with the Data Protection Act 2018, the UK GDPR and all associated laws.

We have a Data Protection Compliance Manager who makes sure we respect your rights and follow the law. If you have any concerns or questions about how we look after your personal information, please contact the Data Protection Compliance Manager, Jon Clark, at data-protection@touchstoneresi.co.uk.

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Why we collect your personal information

Do you know what personal information is?

Personal information can be anything that identifies and relates to a living person. This can include information that when put together with other information can then identify a person.

Information we may collect about you may include (but is not limited to):

Name	Identification documents
Address	Income and expenditure
Telephone numbers	Next of kin details
Email addresses	Health data
Date of birth	Criminal data
National insurance number	CCTV images
Bank details	Computer IP address

We may also collect personal information from others with whom you live or receive service from us – this may include:

Family and household members
Friends and visitors
Members of public
Referees

Guarantors
Representatives
Enquirers

Did you know that some of your personal information might be classified as ‘special’?

Some information is ‘special’ and needs more protection due to its sensitivity. It’s often information you would not want widely known and is very personal to you. This is likely to include anything that can reveal information relating to your:

Sexuality and sexual health
Religious or philosophical beliefs
Ethnicity
Physical or mental health

Trade union membership
Political opinion
Genetic/biometric data
Criminal history

We will only collect this type of information if it is necessary to your contract so that we can provide the right services to you.

We may at times need to share this information but we will only do this if we have your consent or if there are legal requirements for us to do so. We may receive information about you from other data controllers, such as to the police, who might tell us about a crime they are investigating where this impacts on your contract with us or those who live in the same community. If you give us this information about yourself when communicating with us, you do so because you consider it forms part of a legitimate interest for us to hold this information on our records.

If we ask for any sensitive personal data about you, we will always tell you why we need it and ask for your consent to hold it.

Why do we need your personal information?

We may need to use some information about you to:

- deliver services and support to you;
- manage those services we provide to you;
- service improvement;
- prevention/detection of crime/fraud;
- help investigate any complaints you have about your services;

- check the quality of services;
- to help with research and planning of new services.

How the law allows us to use your personal information

There are a number of legal reasons why we need to collect and use your personal information.

Generally we collect and use personal information for the purposes of where:

- you are entering or have entered into a contract with us;
- you, or your legal representative, have given consent;
- it is necessary to protect someone in an emergency;
- it is required by law;
- you have made your information publicly available;
- it is necessary for legal cases;
- it is necessary for archiving, research, or statistical purposes.

Consent and Your Preferences

We may contact you or send communications to tell you about a service enhancement such as improvements to our online services or to keep you informed on how we are performing. We won't need your consent to communicate with you this way because we have assessed that it forms part of our agreement with you and it is of mutual interest for us to keep you informed and is relevant to your contract with us.

We would like to occasionally send you information on other products and services we offer, and which we think will be of interest to you. We will ask for your consent to communicate this type of information to you and you can remove your consent and ask us to stop at any time.

Touchstone is part of the Places for People Group, one of the largest property and leisure management organisations in the UK. Places for People provides customers with a wide range of products and services, including leisure centre and gym memberships, affordable finance products and retirement services to name just a few. We would like to occasionally send you marketing information on products and services that we think will be of interest to you and we will ask for your consent to do this. We promise to treat your contact details with the utmost care, and to never pass them to companies outside of the Places for People Group.

If we have consent to use your personal information to send you information about other Places for People Group companies products and services, you have the right to remove it at any time. Touchstone provide access for you to update your

consents to marketing, you can do this at any time by logging on to your online account or alternatively email Marketing.Preferences@touchstoneresi.co.uk.

If you do not want to sign up for an online account but you want to remove your consent, please contact Marketing.Preferences@touchstoneresi.co.uk and tell us which service you are removing your consent for, so we can deal with your request.

We only use what we need

Where we can, we'll only collect and use personal information if we need it to deliver a service or meet a requirement.

If we don't need personal information we'll either keep you anonymous if we already have it for something else or we won't ask you for it. For example, in a survey we may not need your contact details so we'll only collect your survey responses.

If we use your personal information for research and analysis, we'll keep you anonymous or use a different name unless you've agreed that your personal information can be used for that research.

We won't sell your personal information to anyone else.

We may share your information with other companies within our group, we will always ask for your consent to do this and you can ask us to stop at any time.

We will always provide an option for updating your marketing preferences on our communications with you.

Visiting our websites

When you visit one of our websites, we collect standard internet log information for statistical purposes.

- We use cookies to collect information in an anonymous way, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.
- We do not make any attempt to identify visitors to our websites. We do not associate information gathered from our sites with personally identifying information from any source.
- When we collect personal information, for example via an online form, we will explain what we intend to do with it.

Our websites contain links to various third party websites. We are not responsible for the content or privacy practices of any external websites that are linked from our sites.

How we use your telephone number and email address

Text messages and contact via telephone or email provide a direct way to contact and share information with you about the services we can deliver to you. It can also help you receive important messages about your tenancy or which may interest or be a help you to you, such as new online services.

If you provide your telephone number or email address we may keep in contact with you by these methods.

Operational SMS/text/email messaging and calls

If you supply us with your telephone or email contact details, we may use them to call or send you operational text messages.

- Examples of operational text messages might be (but not limited to):
- Confirming a repair and/or a time and date for a repairs contractor to visit;
- Confirming a home visit;
- Rent Account updates, arrears actions;
- Sending a reminder about an appointment;
- Asking you to contact a named person or department;
- Satisfaction surveys.

Sharing your telephone number with third parties

We may pass your telephone number to third parties so that we can meet our contractual obligations with you. We may also share your telephone numbers if we are required to by law.

We may supply the details to our approved third party contractors who are delivering or performing services on our behalf, and these companies must not use your information for any other purpose. We never share or sell your telephone numbers to telesales/marketing companies.

Who do we share your information with?

We use a range of organisations to either store personal information or help deliver our services to you. Where we have these arrangements there is always an agreement in place to make sure that the organisation complies with data protection law.

We may enter into partnerships with other organisations such as local authorities and the police. For example, we may join a partnership to help prevent and control anti-social behaviour. In order to protect your information, we will enter into a legally binding data sharing agreement with partner organisations before any sharing takes place. It is not always possible for us to tell you that personal information is being shared, for example when we are working with the police or other agencies to help the investigation or detection of a crime as to do so may prejudice that investigation.

We are likely to share your personal information with the following:

- **Property Services and Repairs**

Contractors and third supply chain service providers for the purposes of carrying out property related inspections and repairs. Generally we will only share your name, the property address and your contact details so that they can arrange an appointment with you. In some cases we may also share customer service information with them, for example where you have told us that you need longer to answer your door. We may also need to share information where we have recorded there is a potential risk to operatives or other representatives.

- **Local Authorities**

We will share your personal information with local authorities usually for the purposes of providing services processed by that local authority such as Universal Credit purposes.

We may also share information with local authorities for the purpose of investigating tenancy fraud or other types of fraud or criminal investigations. You will not have a right to be told about this type of sharing because to do so may affect those investigations. However, we will take steps to protect your information and only share what is necessary for those investigations.

- **Police**

We may share your personal information with the police for the purposes of preventing or detecting a crime or fraud.

- **Safeguarding and Support Agencies**

We may need to share your personal information with support agencies if we suspect that there may be safeguarding concerns about yourself or those who are your dependent(s). We will not tell you about this beforehand, however, we will take steps to only share that personal information which is necessary for the safeguarding purposes.

- **Utility companies and local authorities**

We may need to share your personal information with utility companies [gas, electric, water] and local authorities for the purpose of ensuring utility services and council tax to the property are correctly charged.

- **Debt Recovery Agents**

We may share your personal information with debt recovery agents for the purposes of recovering any outstanding charges owed to us.

- **Legal Services and Partners**

We may share your personal information with our legal services or solicitors if we are preparing or defending a legal claim.

- **Places for People Group companies**

We may share your information with shared service functions within the Places for People Group, such as for the purpose of financial transaction when making payments to us or the Insurance functions if you make a claim. Places for People Group shared services comply with and process personal information within the same privacy standards and procedures.

Where there is a high risk to your personal information, we will complete a privacy assessment before we share personal information to make sure we protect privacy and comply with the law.

Sometimes we have a legal duty to provide personal information to other organisations, this is often because we need to give that data to the police, courts, local authorities or government bodies.

We may also share your personal information when we feel there's a good reason that's more important than protecting your privacy. This doesn't happen often, but we may share your information:

- in order to detect and prevent a crime and fraud; or
- if there are serious risks to the public, our staff or to other professionals;
- safeguarding of vulnerable individuals;

- to protect adults who are thought to be at risk, for example if they are frail, confused or cannot understand what is happening to them.

If we're worried about your physical safety or feel we need to take action to protect you from being harmed in other ways, we'll discuss this with you and, if possible, get your permission to tell others about your situation before doing so.

For all of these reasons the risk must be serious before we can override your right to privacy.

We may still share your information if we believe the risk to others is serious enough to do so.

There may also be rare occasions when the risk to others is so great that we need to share information straight away.

If this is the case, we'll make sure that we record what information we share and our reasons for doing so. We'll let you know what we've done and why if we think it is safe to do so and will not cause harm, distress or further risks to you, our staff, other professionals and/or the public.

Keeping your information secure

We store personal information both electronically and in paper form.

We implement security policies, processes and technical security solutions to protect the personal information we hold from:

- Unauthorised access;
- Improper use or disclosure;
- Unauthorised modification;
- Unlawful destruction or accidental loss.

We'll do what we can to make sure we hold records about you (on paper and electronically) in a secure way, and we'll only make them available to those who have a right to see them. Examples of our security include:

Encryption, meaning that information is hidden so that it cannot be read without special knowledge (such as a password). This is done with a secret code or what's called a 'cypher'. The hidden information is said to then be 'encrypted';

- Pseudonymisation, meaning that we'll use a different name so we can hide parts of your personal information from view. This means that someone outside of the Places for People Group could work on your information for us without ever knowing it was yours;
- Controlling access to systems and networks allows us to stop people who are not allowed to view your personal information from getting access to it;
- Training for our staff allows us to make them aware of how to handle information and how and when to report when something goes wrong;
- Regular testing of our technology and ways of working including keeping up to date on the latest security updates (commonly called patches).

When you contact us, we may ask you to provide us with some information so that we can confirm your identity. If other people (e.g. family members, support workers, solicitors) act on your behalf we will take steps to ensure that you have agreed for them to do so. This may include asking them to provide us with supporting information to indicate your consent. We do this to protect you and to make sure that other people cannot find things out about you that they are not entitled to know.

Employees and third parties who have access to, or are associated with the processing of, your personal information are obliged to make reasonable efforts to safeguard it.

Where in the world is your information?

The majority of personal information is stored on systems in the UK. But there may be some occasions, as our technology services progress, where your information may leave the UK either in order to get to another organisation or if it's stored in a system outside of the EU.

We will always have additional protections on your information if it leaves the UK ranging from secure ways of transferring data to ensuring we have a robust contract in place with that third party.

We'll take all practical steps to make sure your personal information is not sent to a country that is not seen as 'safe' either by the UK or EU Governments.

How long do we keep your personal information?

There's often a legal or a contractual reason for keeping your personal information for a set period of time. We will keep your information for the duration of providing a service or product to you under the terms of a contract, such as your tenancy agreement. When your contract has ended we will keep your personal data for a set

time for auditing and reporting purposes and for legitimate interest purposes, after that time we will either anonymise or destroy your information.

You can ask us for a copy of our retention periods by contacting us at dataprotection@touchstoneresi.co.uk.

Your Rights

The law gives you a number of rights to control what personal information is used by us and how it is used by us.

You can ask for access to the information we hold on you

You have the right to ask for the information we have about you. When we receive a request from you in writing, we must give you access to what personal information we've recorded about you.

However, we can't let you see any parts of a record which contain:

- Confidential information about other people; or
- May be held in preparation to defend legal claims.

This applies to personal information that is in both paper and electronic records. If you ask us, we'll also let others see your record (except if one of the points above applies).

A request for personal information can be made via email or in writing. This is known as a subject access request. In order to make a subject access request you will need to provide the following information:

- your name;
- your address;
- proof of identity and signature;
- enough information to identify your records.

What types of documents could I submit as proof of ID?

- Copy passport with signature (please remove your passport number);
- Copy driving license picture with signature (please remove your driver number);
- Copy of signed tenancy or contract with us.

You can write to us at the following address:

Touchstone
Data Protection Compliance Manager
2 Crescent Office Park
Clarks Way
Bath
BA2 2AF

Alternatively email us at data.protection@placesforpeople.co.uk. (Please ensure you attach your identity documents with the document reference numbers removed).

We will not start your subject access request until we are satisfied that you have provided us with enough information for us to identify you.

Once you have made a request you will receive an acknowledgement and your request should be answered within one month. In certain circumstances, we are allowed to take longer but we will tell you if we feel we may need longer without undue delay from when we receive your request.

If you can't ask for your records in writing, we'll make sure there are other ways that you can. If you have any queries about access to your information, please contact Jon Clark on 01225 838490

You can ask to change information you think is inaccurate

You should let us know if you disagree with something we may have recorded about you.

We may not always be able to change or remove that information but we'll correct factual inaccuracies and may include your comments in the record to show that you disagree with it.

Please contact us at data-protection@touchstoneresi.co.uk if you would like to request a change to the data we hold.

You can ask to delete information (right to erasure)

In some circumstances you can ask for your personal information to be deleted, for example:

- Where your personal information is no longer needed for the reason why it was collected in the first place;

- Where you have removed your consent for us to use your information (where there is no other legal reason us to use it);
- Where there is no legal reason for the use of your information;
- Where deleting the information is a legal requirement.

Where your personal information has been shared with others, we'll do what we can to make sure those using your personal information comply with your request for erasure.

Please note that we can't delete your information where:

- we're required to have it by law;
- it is for historical research, or statistical purposes where it would make information unusable;
- it is necessary for legal claims.

You can ask to limit what we use your personal data for

You have the right to ask us to restrict what we use your personal information for where:

- you have identified inaccurate personal information, and have told us of it;
- where we have no legal reason to use that information but you want us to restrict what we use it for rather than erase the information altogether.

We will assess whether you have a right to a restriction and where restriction of use has been granted, we'll inform you before we carry on using your personal information.

Where possible we'll seek to comply with your request, but we may need to hold or use information because we are required to by law or we have a legal basis to do so, such as a contract.

You can ask to have your information moved to another provider (data portability)

You have the right to ask for your personal information to be given back to you or another service provider of your choice in a commonly used format. This is called data portability.

However this only applies if we're using your personal information with consent (not where we are processing your personal information for contractual, legitimate interests, legal obligations or vital interests as a legal basis) and if decisions were made by a computer and not a human being.

It's likely that data portability won't apply to most of the services you receive from Touchstone.

Right to understand Automated Decisions made about you

You can ask to have any computer made decisions explained to you, and details of how we may have 'risk profiled' you.

You have the right to question decisions made about you by a computer, unless it's required for any contract you have entered into, required by law, or you've consented to it.

You also have the right to object if you are being 'profiled'. Profiling is where decisions are made about you based on certain things in your personal information, e.g. your health.

If and when your personal information is used to profile you, in order to deliver the most appropriate service to you, you will be informed.

If you have concerns regarding automated decision making, or profiling, please contact the Data Protection Compliance Manager at data-protection@touchstoneresi.co.uk who'll be able to advise you about how we are using your information.

How to tell us of a data breach

Touchstone and Places for People Group takes responsibility to protect the personal information we hold about those with whom we work seriously. We are accountable for our processing and take necessary technical and operational steps to information security protections.

If you suspect your personal information or that of others may have been at risk of a data protection breach please tell us by using the breach notification link: <https://dataprotection.pfpshare.co.uk/breach/Lists/Breach/NewForm.aspx>

The above link has been made available to everyone with whom we deal so that customers, employees and supply chain processors can tell us without undue delay of potential or actual breach.

Where can I get advice?

If you have any questions about how your personal information is handled, please contact our Data Protection Officer at data-protection@touchstoneresi.co.uk

For independent advice about data protection, privacy and data sharing issues, you can contact the Information Commissioner's Office (ICO) at:

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

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.

Alternatively visit ico.org.uk or email casework@ico.org.uk.