



## Privacy notice

**Who are we:** B3 Living Ltd including B3Living Development, Everlea Homes and B3@Home.

**How can we be contacted about data protection:**

B3 Living Ltd. Scania House, 17 Amwell Street, Hoddesdon Hertfordshire, EN11 8TS

Tel: 01992 453 700

Email: [enquiries@b3living.org.uk](mailto:enquiries@b3living.org.uk)

**Our Data Protection Officer is:** Lisa Boulton

Email: [lisa.boulton@b3living.org.uk](mailto:lisa.boulton@b3living.org.uk)

Tel: 01992 453 737

B3Living holds lots of personal information about our customers and employees and we need to make sure it is used and kept carefully in line with the General Data Protection Regulations.

Personal information, sometimes called personal data, is information relating to living people who can be identified from the information.

When we use your personal information B3Living is known as something called a 'data controller' this means that we decide how to collect your personal information and how it is used and why and how it is stored and how long we keep it for.

Sometimes we are asked by other organisations to carry out work using your personal information for their purposes we are then known as a 'data processor' and we follow the instructions given to us by the other organisation about how it is used and why and how long we keep it for.

## **Why do we use your personal information?**

When we use your personal information, this is called processing. We use your information to:

- manage your tenancy or lease
- provide you with support
- manage your employment if you are an employee

Further down are some examples of how we use your personal information.

## **What are the lawful bases for processing**

The law requires us to identify the 'lawful basis' for using your personal information.

Depending on the reason we will be using your personal information for:

- the performance of a contract such as managing a tenancy or lease agreement or employment contract.
- legitimate interests so for our commercial interest or to benefit our customers
- to comply with the law
- or with your consent

## **We do not share your information to any third countries or international organisations**

This privacy notice applies to: B3 Living Ltd including B3Living Development, Everlea Homes and B3@Home.

This Privacy Notice tells you everything you need to know about:

- what information we collect from you
- how we collect information from you
- how we store it
- why we use it
- who we share it with and why

We collect information about:

- customers – this includes current, former and potential customers who live in our properties or access our support and other services this could also include their family and people associated with them
- colleagues – this includes current, former and potential colleagues as well as Board Members, casual workers; agency workers; work experience; consultants and volunteers

- anyone who makes a complaint or enquiry and visitors to our website and offices

### **Information we may collect from you**

If you work for B3Living or have applied for a job with us, please see the Privacy Notice on our recruitment companies' website.

### **For Customers**

We may collect the following personal information about you:

- your name and contact details, we will use this across B3Living and by our suppliers, partners and contractors
- detailed personal information such as age, sex, date of birth, ethnicity, disability, employment status, particular needs or preferences so that we can understand you and your needs better and tailor our service to you

For housing management purposes, we will ask you for:

- bank details and direct debit information to make payments to us such as rent or service charges (we only exchange the details with the account holder and the third party who manages our direct debits)
- benefit and council tax information to verify your circumstances
- information that you provide to B3Living in connection with your tenancy or lease
- proof of identity for new lettings (e.g. passport)

To improve your experience with B3Living:

- you can give us details of your friends, relatives or neighbours who you trust to contact us on your behalf, e.g. to arrange one of our services for you
- you can give us details of anyone you have formally authorised (such as giving them a Lasting Power of Attorney) to contact us on your behalf
- your name and contact details for Customer Satisfaction surveys, newsletters and product and service information
- with your consent, your name, photo, video or story for brochures, advertising or press releases or use by the media
- any information about complaints about our service or other individuals including disputes, or accidents or incidents involving you or your home
- your comments about services from us or our suppliers or contractors
- to promote equal opportunities and fair treatment of our customers

If you ask for additional B3Living services:

- your name and contact details for someone to contact you (the person may be a B3Living colleague or from another organisation that we will tell you about)
- if you ask us for support requirements we will hold detailed information about your needs and/or your family's needs
- records of payments for the services
- if you contact us about money problems we will hold detailed information about your income and debts;
- we may hold information about your history, e.g. regarding credit, or offences, if we need it to look after our colleagues, business or anyone else
- if you make a complaint we will use them to investigate and resolve the complaint
- if you ask us to contact you about home ownership products

If we are providing a service to you on behalf of another organisation or someone else:

- we will receive information from your service provider and we will exchange the information we need to provide services to you on their behalf
- we may receive management information about the accounts we manage

We may get the information, or related information, from your or our partner organisations from you, your family, friends or neighbours, our colleagues or public information sources including credit reference agencies or the Disclosure and Barring Service.

We may also record factual information whenever you contact us or use our services, as well as information about other action we take, so we have a record of what happened.

We may also record telephone calls made to us.

### **Violent or abusive behaviour**

If you are violent or abusive to B3Living colleagues, contractors, customers or other residents, we may decide to place a "violent warning marker" on your customer record to protect B3Living colleagues.

If we do this, we will write and tell you why and you will have the right to appeal against our decision. We will share this information with our partners, for example our contractors to protect their staff too.

## **Credit reference agencies**

To ensure our records are up to date and for the prevention, detection and prosecution of crime, including social housing fraud and benefit fraud; we will from time to time use credit reference agencies. Any information we receive will not be passed on to third parties and will not be used for any inappropriate purposes.

If we access your data, we will in all cases seek to check with you that the information is correct.

## **CCTV**

Some of our estates, Independent Living schemes and offices in public areas have and use CCTV to deter crime and anti-social behaviour and to promote public safety by helping to identify and prosecute criminal offenders. You can ask for a copy of any CCTV images taken of yourself by making a request to us see below section **Accessing the information we have about you**.

## **Where we store your personal information**

We are committed to holding your personal information securely. This means only those of our colleagues and contractors that need to see it have access.

If we can store your personal information solely on computers we will, however there will be cases where we have paper copies instead, or as well.

Our computer system is at our offices in Hoddesdon, but we do use computers (including laptops and tablets) outside our offices if they are secure and under our control.

## **What we use your personal information for:**

- for tenancy and leasehold management including the above, and generally for providing our services for you
- provide a repairs and maintenance service from our in-house repairs colleagues and by external contractors
- keeping in touch with our customers, understanding your needs and preferences, offering and booking appointments with you. This includes sending text messages.
- telling you about changes to B3Living and its services
- meeting your housing management needs
- managing payments from you, to you or on your account, and for accounting purposes

- providing additional services, where available, at your request including support services
- prevention, detection and prosecution of crime, including social housing fraud and benefit fraud
- quality management including surveys
- informing our colleagues, contractors or others (as appropriate) about past incidents e.g. anti-social behaviour, for their protection, in line with our policies
- meeting our legal obligations including information we must provide to our funders or regulators
- us or our other suppliers exercising legal rights, including under contract with you
- with our insurers to defend claims made against us
- other purposes - we may anonymise your information so that it cannot be linked to you. In that case we may use the data for any purpose

### **Who else we may pass on your information to**

Normally, only B3Living will be able to access your personal information. However, there may be times when we disclose your details to others, as follows:

- B3Living and its subsidiaries and shared ownership brand

Our suppliers and contractors who enable us to provide our services to you, or who provide services on our behalf. When we share your information, we will only supply the minimum necessary to carry out the services for you:

- contractors e.g. to undertake repairs, maintenance or improvements to your home
- IT providers who own or manage the computers, phones or systems we use
- our contractor(s) who handle your out of hours service calls for us
- banks e.g. to carry out payments through a secure system
- companies that assist us in mailing out our leaflets / newsletters
- shared anti-fraud services and initiatives to detect fraud or crime
- additional colleague resources, such as consultants or agency staff
- our professional advisors including solicitors, insurers, auditors and providers of financial services
- if we believe that someone is at risk of harm we will share that information with a relevant body

Our partner organisations whose purposes dovetail with ours so that they can provide you with a service:

- other housing associations

- external assistance where you have agreed to the referral, for example to do with money problems or support
- local authorities and Government departments who provide relevant services for you, including benefits
- the Police, Fire Service, health authorities or medical staff who provide services for you

Others who may request information from us for their own purposes:

- utility companies including water companies
- for crime prevention or detection, risk assessment, resolution of complaints or other issues
- local authorities, Safeguarding Boards, regulators, Government departments and other public authorities, such as for preventing payment errors or fraud
- the Police, Fire Service, health authorities or medical practitioners

We may sometimes be obliged to disclose your personal data by law such as by a regulator with appropriate power (e.g. the Homes and Community Agency), or court order.

We do not give anyone else access to your information in return for payment, for their marketing or commercial purposes.

Unless you pay our bills using direct debit we will not usually retain your payment details. Whoever pays your bills will have to give us the payment card details each time they make a payment.

We will not share your personal information with anyone who claims to represent you unless we are satisfied that you have appointed them, or they act in some recognised official capacity. There may be a delay to us dealing with requests whilst we confirm the caller's identity or check that we have your approval to deal with them.

## **Social media**

We may get your information from social media, whether on our own sites or elsewhere. Where you use B3Living's website or social media you grant us an irrevocable, royalty-free, non-exclusive license, and give us your consent, to copy, use and reproduce any of your contributions for any purpose.

Where you contribute to any social media (whether on our own site or elsewhere) we may use that information for any of the purposes stated in this privacy notice.

Where a contribution to any social media (whether on our own site or elsewhere) constitutes a breach of B3Living's IT Security policy or any other

policies, terms and conditions or laws that apply, we may take the following actions:

- issue you with a warning.
- start legal proceedings against you for reimbursement of all costs on an indemnity basis (including, but not limited to, reasonable administrative and legal costs) resulting from the breach.
- take further legal action against you (including, but not limited to, proceedings for a breach of your contract of employment or another contract you may have with us).
- report you and disclose such information to the appropriate law enforcement authorities or statutory body in any jurisdiction as we reasonably feel is necessary.
- publish such information about you as we reasonably feel is appropriate, publicly (which may include social media).

We exclude liability for actions taken in response to breaches of any B3Living policy. The responses described in this privacy notice are not limited, and we may take any other action we reasonably deem appropriate and we are not obliged to take any action.

Where you contribute to our social media, we may also take the following actions in addition to any other actions described above:

- Immediate, temporary or permanent withdrawal of your right to use our social media.
- Immediate, temporary or permanent removal or editing of any posting or material uploaded by you to our social media.

### **How long do we keep your personal information for?**

During your tenancy or lease period we will review your personal information periodically. We will delete or destroy personal information if we no longer use it to manage our services to you.

At the end of your tenancy we will review your records and delete or destroy any information that we no longer need. We may need to keep some of your information even when your tenancy ends in this case we will delete or destroy it after 6 years.

### **Applying for B3Living Jobs and working for B3Living**

When you apply to work for B3Living we will use your personal information to help us recruit staff. B3Living uses an applicant tracking system and recruitment services provided by a company called Networkx. You can apply for a B3Living job using the Networkx website via our website or register as a candidate and set up alerts for jobs at B3Living.

The recruitment software and our application form will ask for your personal information which is used to assess your suitability as a candidate and monitor the effectiveness of our recruitment processes, this includes:

- name and contact details
- your secondary and higher education and employment history
- your experience
- you can upload your CV if you are registering for job alerts
- other relevant information to assist your application and job search
- we also ask for other information such as your gender
- we will also ask you for any conflicts of interest

We will also ask you for your referee's details that will be used if you are offered a job role at B3Living.

We have a separate privacy policy on the Networx's website that explains in more detail about how your personal information is managed and used for recruitment purposes.

From time to time we may also use specialised recruitment agencies for certain jobs or posts. In these instances, please refer to the agencies own privacy statement.

We will use your information to progress your application or to fulfil legal or regulatory requirements.

Personal information about unsuccessful candidates including those we did not interview will be held for 12 months after the recruitment exercise has been completed. After this time the information will be destroyed or deleted. It will include application forms and interview notes and any assessments you have completed as part of your application process.

We will retain the application and any notes and test scores of the successful candidate and include it in their employment record.

If we make a conditional offer of employment to you, we will ask for information so that we can carry out pre-employment checks to progress to a final offer. We are required to carry out checks to confirm the identity of our staff and their right to work in the United Kingdom. We will ask you for the following:

- proof of your ID and right to work in the UK
- proof of your qualifications

We will contact your named referees for your reference and ask you to complete a health questionnaire. Your health questionnaire is sent direct to a

qualified employment medical specialist who will check your fitness for work and if we need to make any adjustments for you.

Some job roles will require a criminal records check, we will do this using the Disclosure Barring Service (DBS) this will require that a form is completed by you and you will be asked questions about your criminal history. We will tell you in the job advert and person specification if a DBS check is required.

If you are a successful candidate and you take up an offer of employment with B3Living we will generate a file relating to your employment, this will be both an electronic and paper file. The information contained is kept secure at our main office at Scania House and will only be used for purposes directly relevant to your employment.

Successful candidates will be asked to provide the following information:

- your P45 for tax purposes
- bank details to process your salary
- emergency contact details so we know who to contact in an emergency

You will also be required to complete a Probity form declaring any conflicts of interest this is part of our Code of Conduct. You will also need to complete a form including your personal data for benefits including pension.

If you are an employee of B3Living we will use your personal information for the following reasons:

- to manage your employment with B3Living including for pay and reward and for statutory purposes
- to manage your development
- to promote fair treatment and promote equal opportunities

We will share your personal data with third parties to manage your employment and for statutory purposes including:

- HMRC
- benefits agencies
- staff benefits scheme
- payroll provider
- B3Living's financial advisors who administer some of our benefits
- pension providers
- private medical insurance provider
- occupational health
- our legal advisors
- external counselling and mediation services

Once your employment has ended we will retain your records for the period in our retention policy it will then be destroyed or deleted.

## **Your rights**

You have certain rights about your personal information. Not all the rights will apply to the information you have given to us and the reasons we use your personal information for.

In some circumstances you have the right to ask us not to process your personal information entirely or partly however we may be unable to provide our service to you if we are unable to record and process certain details.

You have the right to ask us to make changes to your personal information if it is wrong we will aim to put right any inaccuracies as quickly as possible and within 28 days.

In some circumstances you can ask us to delete your personal information. We will not be able to do this if you are a current customer or employee or if you are a former customer or employee and your data is being held within our data retention period.

If we are using your personal information with your consent you can withdraw your consent at any time by contacting our Data Protection Officer. Their details can be found at the beginning of this document.

If you want to exercise your rights you can ask any of our colleagues or write to our Data Protection Officer at our registered office address, Scania House, 17 Amwell Street, Hoddesdon Hertfordshire, EN11 8TS. We will respond to your request within 28 days.

You have the right to complain to the Information Commissioner if you think there is a problem with the way we have handled your personal information. The Information Commissioner can be contacted on 0303 123 1113 and has a useful website at [www.ico.org.uk](http://www.ico.org.uk) where you can find more information.

## **Accessing the information we have about you**

You have a legal right to access information that we hold about you. You can ask any of our colleagues or write to our Data Protection Officer at our registered office address, Scania House, 17 Amwell Street, Hoddesdon Hertfordshire, EN11 8TS.

We will respond to your request within 28 days and in most cases, we will be able to comply with your request. However, we may not be able to provide

you with your request if your personal information contains details about another person.

If you want to make a complaint to B3Living about the way we have handled your personal information or want to know how that information will be used, contact the Data Protection Officer at Scania House, 17 Amwell Street, Hoddesdon, Hertfordshire, EN11 8TS, or via email at [lisa.boulton@b3living.org.uk](mailto:lisa.boulton@b3living.org.uk), or Tel: 01992 453 737.

### **Changes to our Privacy Notice**

This Notice may change. We will display the new Notice in all places where it can usually be found, such as on our website.

Our nominated representative for the purposes of the regulations is Lisa Boulton Health and Safety Compliance Manager.

### **Use of cookies by this site**

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

The tables below explain the cookies we use and why.

#### First Party Cookies

<b>Cookie</b>	<b>Type</b>	<b>Expiry</b>	<b>Functions</b>
CFID	Persist	2 hours	When a user logs in, maintains authentication state.
CFTOKEN	Persist	2 hours	Helps to identify a client device (browser) to enable the site to maintain user session variables.
JSESSIONID	Session	Session end	Used to maintain an anonymous user session by the server.
VOPECRA	Persist	Never	Remembers when a user has elected to accept cookies.

## Third Party Cookies

Cookie	Type	Expiry	Functions
__utmb	Persist	30 mins from set/update	Used to determine new sessions/visits. The cookie is created when the javascript library executes and no existing __utmb cookies exists. The cookie is updated every time data is sent to Google Analytics.
__utmt	Persist	10 minutes	Used to throttle request rate.
__utmz	Persist	6 months from set/update	Stores the traffic source or campaign that explains how the user reached the site. The cookie is created when the javascript library executes and is updated every time data is sent to Google Analytics.
__utmc	Persist	End of browser session	Not used in ga.js. Set for interoperability with urchin.js. Historically, this cookie operated in conjunction with the __utmb cookie to determine whether the user was in a news session/visit.
__utma	Persist	2 years from set/update	Used to distinguish users and sessions. The cookie is created when the javascript library executes and no existing __utma cookies exists. The cookie is updated every time data is sent to Google Analytics.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.allaboutcookies.org.uk](http://www.allaboutcookies.org.uk)

To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>.

### Google Analytics Demographic Tracking:

We use "Google Analytics" to collect **anonymous** information about use of this site.

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 this site.

Although Google Analytics plants a permanent cookie on your web browser to identify you as a unique user the next time you visit this site, the cookie cannot be used by anyone but Google. Google's 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](#) (as [amended for government websites](#)) and the [Google Privacy Policy](#).

Google Analytics employs cookies to define user sessions, which allows for the collection of data about how visitors are using the websites.

The standard Google Analytics tracking function uses [first party cookies](#). This means that the cookies are linked to a specific website domain, and Google Analytics will only use that cookie data for statistical analysis related to your browsing behaviour on that specific website. According to Google, the data collected cannot be altered or retrieved by services from other domains.

In addition to the standard Google Analytics first party cookie, we have also enable Google's Advertising Features. This includes the following functions:

- Demographics and Interest reporting
- Remarketing,
- GDN Impression Reporting,
- DoubleClick Campaign Manager integration

We primary utilise third party cookies to track anonymous age, gender and interest data to improve the website experience for our users.

These features collect data about web traffic via [Google advertising cookies](#) and [anonymous identifiers](#)

If you choose, you can opt out by [turning off cookies](#) in the preferences settings in your web browser. For more information on Google Analytics, please visit [Google Analytics](#). You can also make use of [Google's opt out tool within Chrome](#).