



Dimensions Group

Privacy Notice

Introduction

Welcome to our privacy notice.

Please note that this privacy notice relates to the activities of:

1. Dimensions (UK) Limited – a charitable registered society under the Co-operative and Community Benefit Societies Act 2014 (Financial Conduct Authority No. 31192R and the Homes & Communities Agency number: 4648) (**Dimensions UK**);
2. Dimensions Somerset SEV Limited (trading as Discovery) – a registered charity and company limited by guarantee incorporated and registered in England and Wales (company number: 10257343 and registered charity number: 1172574);
3. Outreach 3-Way is a company limited by guarantee incorporated and registered in England and Wales (company number: 1474488 and registered charity number: 278140);
4. Dimensions Cymru is a company limited by guarantee incorporated and registered in England and Wales (company number: 12531369 and registered charity number: 1191485),

(collectively referred to as the "**Dimensions Group**", "**we**", "**us**" or "**our**" in this privacy notice).

The Dimensions Group respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website(s) (regardless of where you visit them from) and/or when you or a family member or friend receives services from us; tell you about your privacy rights; and how the law protects you.

Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

By using this website, you signify your acceptance of this notice. If you do not agree to this notice, please do not use our website(s). Your continued use of the website(s) following the posting of changes to this notice will be deemed your acceptance of those changes.

1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how the Dimensions Group collects and processes your personal data through:

- a. your use of this website, including any data you may provide through this website when you enquire about our services, interaction with our social media channels or survey accounts;
- b. provision of care to you as a person we support;
- c. provision of care to a family member or friend; and/or
- d. provision of housing for all tenants or licensees of a Dimensions house or flat.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

This privacy notice supplements other notices and privacy policies and is not intended to override them. Additional privacy policies exist for colleagues, for job applicants and for volunteers. These complement the information in this privacy notice.

Controller

This privacy notice is issued on behalf of the Dimensions Group so when we mention Dimensions Group, "**we**", "**us**" or "**our**" in this privacy notice, we are referring to the relevant company in the Dimensions Group responsible for processing your data.

We will let you know which entity will be the controller for your data when you purchase a service with us. Dimensions UK is the controller and responsible for this website.

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 us using the details set out below.

Who is the Dimensions Group and how to get in touch?

If you have any questions about this privacy notice or our privacy practices, please contact our DPO in the following ways:

Dimensions Group

Full name of legal entity: Dimensions (UK) Limited, Financial Conduct Authority No. 31192R and Regulator of Social Housing registration number: 4648

Email address: dpo@dimensions-uk.org

Telephone: 0300 303 9001

Postal address: 2nd Floor, Building 1430, Arlington Business Park, Theale, RG7 4SA

You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us and our customer service teams in the first instance.

Changes to the privacy notice and your duty to inform us of changes

We keep our privacy notice under regular review. This version was last updated in May 2021. Historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

A note about third-party website links

Content on the Dimensions website, or sometimes in other documentation produced by Dimensions, may include links or references to third-party websites, plug-ins and/or applications. Clicking on or navigating to those links, or enabling connections to the plug-ins or applications, may allow third parties to collect and/or share data about you. We do not control these third-party sites/products and are not responsible for their privacy statements or data processing activities. When you leave our website, we encourage you to read the privacy notice of each website you visit to make sure you are happy with how they say they will use your data before you agree to hand over any personal data.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- in respect of the **Dimensions Group** in general:
 - **Identity Data** includes first name and last name;
 - **Usage Data** includes information about how you use our website and services;
 - **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences;
 - **Contact Data** includes postcode, town/city, email address and telephone/mobile numbers; and
 - **Technical Data** includes the type of device you have used to access the site (including the make, model, operating system, internet protocol (IP) address and browser type, your login data and version, time zone setting and location, browser plug-in types and versions;
- in respect of **people we support**:
 - **Identity Data** includes first name and last name, health, and history;
 - **Profile Data** includes communication requirements, risk opportunity plans, information about personal or family rituals including a place of worship if you have one, and information and/or advice about the way you like to be supported, including how to support you with your personal care, if this is relevant for you, information about your daily routines, what has gone well and not so well, to inform your ongoing support requirements, and information about your goals, which we call outcomes, to ensure that you have the best chances and opportunities to live the life you choose;
 - **Financial Data**, where we manage the individuals accounts, includes all of your account information and records; and
 - **Contact Data** includes email address and telephone/mobile numbers;

- in respect of **family members** and/or **friends** of persons we support:
 - **Identity Data** includes first name, maiden name, last name and medical information (e.g. about your health and history if it relates to us providing the best possible support and care for your relative/friend (such as whether or not a health condition runs in the family));
 - **Profile Data** includes information about personal or family traditions, celebrations or faith (such as a place of worship you like to meet your relative or friend); and
 - **Contact Data** includes email address(es) and telephone number(s); and
- in respect of **tenants** or **licensees** of a Dimensions house or flat:
 - **Identity Data** includes first name, last name, (including in relation to any appointees to help with benefit applications or rent payments), date of birth, National Insurance number, address, and medical details (allergies, health conditions, disabilities, or vulnerabilities, for example if you need wheelchair access or adaptations to your housing);
 - **Profile Data** includes details of your housing need when you apply for housing so we know who needs housing most urgently, and your interests, preferences, feedback and survey responses;
 - **Contact Data** includes email address(es) and telephone number(s); and
 - **Financial Data** includes your household income, bank details (so you pay your rent by direct debit), rent statements, and rent payment records.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing interested in particular services. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

In some circumstances, we will collect **Special Categories of Personal Data** about you (this may include details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, information about your mental or physical health (including conditions, disabilities and/or vulnerabilities), and genetic and biometric data).

Using Special Category of Personal Data means that we need to be even more careful with how we use, store and share the same. The type and amount of Special Categories of Data collected, what it's used for, and how long we might keep it depends on what we are trying to achieve as an organisation. It could be to help tailor care for you, better understand your needs, ensure you are treated equally, or even to identify the right people to communicate with you. If you are unsure or

uncomfortable with being asked for any Special Categories of Personal Data, please do not hesitate to contact our DPO at: dpo@dimensions-uk.org.

Additionally, information we collect via Dimensions Group social media channels is dependent on what you share with us. We may access publicly available details on your profile to get more, relevant information about you. We will never share, or ask you to share, personal data that is not already publicly available.

Personal data we collect via Dimensions Group, SurveyMonkey or Crowdsignal accounts, is dependent on the survey being carried out and what you decide to share with us.

Supported individual records

As part of our responsibilities to our supported individuals, we are required to make a record of such individual's activities throughout their time with us in order that we are able to keep family members / concerned individuals updated with their progress, as well as for compliance with our legal obligations in caring for such supported individuals.

Living in a shared house or in some instances living in a block of supported living flats or houses, can often lead to friendships and periods of natural and sometimes funded periods of shared support that are part of normal daily life for people that we support. As a result, we may be required to record other individuals' details in a supported individual's records which may be made available to family members and/or friends online via our iPlanet family portal.

For example:

Adam (a supported individual or not) spends time with Emily (a supported individual) and Emily's mum and sister can see iPlanet, so will see Adam's name in Emily's records.

Our employees are trained specifically to take care in recording this data and shall take the utmost care in recording only the requisite information to the extent reasonably practicable, which may or may not include behaviour issues which arose and/or images of you and your time with us. Images may be used to illustrate to family members and friends the activities undertaken by supported individuals. Employees shall use their best endeavours to try and limit shared images to the supported individuals concerned but in some circumstances, other individuals may be visible in the images shared.

Should you like to opt-out of this procedure, and/or if you have any concerns, please do not hesitate to get in touch with our DPO at: dpo@dimensions-uk.org.

Children's personal data

We do not normally process children's information as part of our services to you or your family members; however, if a child is to be supported by us, we will adhere to the highest standard of data privacy and will always act in accordance with the ICO's guidance and applicable legislation.

We undertake DBS checks on all staff who work with young and/or vulnerable people.

If you decline to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity and Contact 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 supported living services;
 - support relatives which we care for by providing emergency contact details or otherwise;
 - subscribe to our services or publications;
 - participate in one of our campaigns or competitions;
 - request marketing to be sent to you;
 - renting accommodation from us as a tenant or licensee;
 - enter a promotion or survey; or
 - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie notice <https://dimensions-uk.org/legal/cookies-website/> for further details.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:
 - Technical Data from the following parties:
 - analytics providers;
 - advertising networks; and
 - search information providers.
 - Identity and Contact Data from data brokers or aggregators and publicly available sources such as Companies House and the Electoral Register based inside the EU.

Information is also provided, in respect of individuals we support, by your local authority, health authority, previous care provider, family member and/or from you directly as part of our assessment and support planning process. We may seek information from others such as health professionals, if this is important in order to better meet your specific care and support needs.

How do we store your information?

Information you share with us via the Dimensions Group websites, social media channels, learning management systems, or market research platforms may be stored within the EU, on:

1. the principal website content management system (Wordpress website hosted by WPEngine);
2. Supplementary content management systems including Dotdigital, Canva, Flickr and Vyond;
3. Dimensions Group's gmail account;
4. Dimensions Group's email servers;
5. Dimensions Group's internal servers;
6. SurveyMonkey and Crowdsignal;
7. Articulate and/or
8. social media channels including Twitter, Facebook, Instagram, LinkedIn, YouTube and other channels in future.

Some information may be stored on mobile devices or printed out and stored as hard copy.

4. How we use your personal data

We will only use your personal data when the law allows us to with internal or external individuals or departments relevant to your case or for reporting purposes. Most commonly, we will use your personal data in the following circumstances:

- 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 obligation.

Please go to the Glossary to find out more about the types of lawful basis that we will rely on to process your personal data.

Save for in respect of family members and friends of people we support and sharing stories and images on our website or otherwise, we do not rely on consent as a legal basis for processing your personal data. You have the right to withdraw consent to marketing at any time by contacting us.

We require all companies we work with to confirm their approach to privacy and information sharing.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
Dimensions Group		
In respect of individuals we support:		
To provide the best possible support and/or care.	(a) Identity (b) Contact (c) Profile	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (to provide the desired service to you)
To deliver the contract we have to provide you with support services as commissioned by your Local Authority or Health Authority.	(a) Identity (b) Contact (c) Profile	(a) Necessary for our legitimate interests (to provide you with the support services via the local authority)
To keep and maintain records in respect of other supported individuals.	(a) Identity (b) Profile	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (to provide support services to other supported individuals)
To distribute newsletters or campaign information to you.	(a) Identity (b) Contact	(a) Necessary for our legitimate interests (to supply information via an e-newsletter or campaigning form)
To deliver better lives for	(a) Identity	(a) Consent

more people by sharing individual stories and images	(b) Profile	
In respect of family and friends of individuals we support:		
To communicate with you about your relative's/friend's support.	(a) Identity (b) Contact	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (to keep you informed about your relative's support)
To check that you are happy with us and your relative's/friend's support.	(a) Identity (b) Contact (c) Profile	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (to keep you informed about your relative's support)
To provide the best possible support and/or care for your relative/friend.	(a) Identity (b) Contact (c) Profile	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (to improve our services)
To keep and maintain records in respect of supported individuals.	(a) Identity (b) Profile	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (to provide support services to other supported individuals)
To distribute newsletters or campaign information to you.	(a) Identity (b) Contact	(a) Necessary for our legitimate interests (to supply information via an e-newsletter or campaigning form)
To deliver better lives for more people by sharing individual stories and images	(a) Identity (b) Profile	(a) Consent
In relation to tenants or licensees of a Dimensions house or flat:		
To ask you about your housing or rent payments and send you rent statements.	(a) Identity (b) Contact (c) Profile (d) Financial	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (to contact you)

To check that you are happy with us and your housing.	(a) Identity (b) Contact (c) Profile	(a) Necessary for our legitimate interests (to improve our services)
To provide the best possible support to help you pay your rent and manage your tenancy.	(a) Identity (b) Contact (c) Profile (d) Financial	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (to assist you)
To make sure you are housed in the most suitable place.	(a) Identity (b) Contact (c) Profile	(a) Necessary for our legitimate interests (to provide suitable services to you)
To distribute newsletters or campaign information to you.	(a) Identity (b) Contact	(a) Necessary for our legitimate interests (to supply information via an e-newsletter or campaigning form)
To deliver better lives for more people by sharing individual stories and images	(a) Identity (b) Profile	(a) Consent
In relation to users of this website:		
To distribute newsletters or campaign information to you.	(a) Identity (b) Contact	(a) Necessary for our legitimate interests (to supply information via an e-newsletter or campaigning form)
To direct your enquiry onto the relevant department so a member of the Dimensions team can respond to you (in respect of this website and our social media channels).	(a) Identity (b) Contact	(a) Necessary for our legitimate interests (to respond to your queries)
To supply data or feedback around a specific topic within Dimensions and possibly third parties where appropriate (in respect of the Dimensions Group SurveyMonkey or Crowdsignal accounts).	(a) Identity (b) Contact	(a) Necessary for our legitimate interests (to improve our service)

To deliver better lives for more people by sharing individual stories and images	(a) Identity (b) Profile	(a) Consent
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NHS National Data Opt-Out

At this time we do not share any data for planning or research purposes for which the National Data Opt-Out would apply. If this changes we will ask the NHS if you have opted out and ensure that we respect your wishes.

If you would like to opt-out to stop your information being shared for this purpose, you need to do this by contacting the NHS. You can find out more information at <https://www.nhs.uk/your-nhs-data-matters/>

Marketing

Dimensions Group does not commission its services directly to the public except in a very small number of circumstances where it is purchased directly by private individuals who are able to pay independently. Our work is, in the overwhelming majority of cases, commissioned by local authorities and the NHS. Consequently, we do not undertake sales communications targeted directly at members of the public.

As a not-for-profit organisation, our vision is ‘better lives for more people.’ To that end a legitimate interest is to help people understand and become involved in the many ways in which life can get better for people with learning disabilities and autism. We may do this through newsletters or campaigning messages.

We will never sell your personal data to third parties.

You can ask us to stop sending you these messages at any time by following the opt-out links on any message sent to you or by contacting us at any time.

Cookies

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. For more information about the cookies we use, please see <https://dimensions-uk.org/legal/cookies-website/>.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will

explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law. Photographs may be taken and used providing individuals give consent for business related purposes.

5. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table above:

- External Third Parties as set out in the Glossary.
- Specific third parties such as:
 - Dotdigital, an email, marketing automation, and customer engagement service provider;
 - SurveyMonkey and Crowdsignal, online survey development cloud-based software as a service companies; and
 - Articulate (an e-Learning provider).
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Information submitted via Dimensions Group websites is accessible by third parties who help manage the content management systems and platforms. These are contractual partnerships and no information will be accessed, exported or shared without Dimensions Group approval.

E-newsletter sign-ups are shared via CSV file or directly into the Dotdigital platform.

Information submitted via a Dimensions Group SurveyMonkey or Crowdsignal account is only shared with relevant parties and, if specified on the survey, will be anonymised.

We may disclose your personal information to any member of our Group, which means our Group companies, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

6. International transfers

Each member of the Dimensions Group is based in the United Kingdom (**UK**) and data is predominantly held on servers within the UK and we do not usually transfer or store your personal data outside the UK.

In the event that we, or some of our External Third Parties, transfer or store personal data on servers outside of the UK we take additional steps to ensure that your information is protected to at least an equivalent level, as required by applicable data protection laws. We will request storage of any data on UK based servers if possible.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data;
- where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK; and
- we will undertake due diligence to ensure that your data is protected.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you or due to safeguarding or care issues or under legislation in relation to Right to Buy and/or health and safety or otherwise.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data: see your legal rights below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

If you would like to find out more information in relation to our retention and disposal policy, please contact datasecurity@dimensions-uk.org and we will be happy to provide advice.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- Request access to your personal data;
- Request correction of your personal data;
- Request erasure of your personal data;
- Object to processing of your personal data;
- Request restriction of processing your personal data;
- Request transfer of your personal data; and
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

THIRD PARTIES

External Third Parties

- Service providers, other customers relating to complaints, payroll providers, suppliers, repairs, maintenance providers, and health & safety consultants, utility companies, business partners and sub-contractors acting as processors based in the United Kingdom and the European Union who provide IT and system administration services;
- Professional advisers acting as processors including support workers, doctors, lawyers, and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services;
- Regulators, such as the Care Quality Commission (CQC) for compliance purposes, and other authorities (including local authorities) and government agencies based in the United Kingdom who require reporting of processing activities in certain circumstances;
- Health and social care professionals, previous care providers;
- Website designers and marketing agents acting as processors on our behalf based in the United Kingdom who provide their services which may require access to personal data;
- Analytics and search engine providers that assist us in the improvement and optimisation of our website;
- Debt collection agencies and legal advisers for the purpose of collecting rent and any other payments due under the tenancy agreement, and any other enforcement issues;
- Contractors who are carrying out services on our behalf; and

- IT and software providers who supply us with our IT infrastructure for the provision of our services and administering our business (including our internal and external communications) and who also help us manage our customer and contact databases, customer relationships and marketing (including but not limited to maintaining secure and up-to-date tenancy records and filing systems).

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.