

LiveWest Customer Privacy Notice

Updated: February 2023

Introduction

We are committed to protecting your data and your privacy. Our privacy notices are designed to help you understand how we collect your personal data and how we use it.

Our customer privacy notice provides information about the types of data that we collect, how we use and store it, and how long we keep it. The information we may hold, use and share will depend on your relationship with us. As we provide a wide range of services we also have additional privacy notices for certain services we provide. These additional notices provide more detailed information and should be read alongside this main privacy notice. The additional notices are:

- Customers who rent a home from us
- Customers who have a shared ownership home
- Customers purchasing or looking to purchase a home
- Customers living in a property with a LiveWest leasehold
- Customers renting a garage from us
- Customers living in supported, sheltered or extra care accommodation
- Customers receiving our tenancy sustainment service
- Community events and community connectors
- Our customer research and engagement work
- Under 18s and children
- Your rights

Our privacy information may be amended occasionally to reflect changes in legislation, or if there are changes to the services that we provide. Please ensure that you keep up to date with these changes by reviewing our privacy information on a regular basis.

This page was last updated on 7 March 2023. If you feel this information is not clear, please get in touch with your feedback communications@livewest.co.uk

Overseas transfers and LiveWest's data protection responsibilities.

Most of our data processing is undertaken in the UK, however some systems we use may be based internationally. Where this happens, we will make sure that the transfers of that data are undertaken in compliance with data protection laws. We may make use of externally provided IT systems which involve international transfers of data.

Data protection law places responsibilities on organisations such as LiveWest to:

- Use your personal data fairly, lawfully and in a clear and transparent way.
- Only use your personal data for the purpose for which it was collected.
- Collect, use, and store the minimum amount of data needed to meet our purpose.
- Ensure accuracy of the data we collect and hold.
- Keep data in line with LiveWest retention rules and regulatory requirements.
- Ensure that we have appropriate security measures in place to safeguard the data that we hold.

Why do we collect your personal data?

We collect, process, and store your personal data to help provide an efficient and high-quality service to our customers, communities, and members of the public. We also have obligations to provide certain information to our regulators and the Housing Ombudsman Service through membership of the scheme.

What types of information do we hold?

We will hold different types of information or data about you, depending on the relationship that we have. Examples of the data that we hold are:

- Personal details such as name, address and date of birth.
- Your contact details.
- Equality and diversity information such as ethnic origin, sexual orientation, health, and disability.
- Information to help us provide our services to you, such as support needs or health conditions.
- Contact details for support services that may be working with you.
- Information relating to your rent account.
- Recordings of some telephone calls.
- Photographs or images on CCTV Footage.
- Feedback provided through our customer research.
- Records of your contacts with us.

Lawful Basis for using your personal data

We are required to have a lawful basis when using your personal data. There are five lawful basis that we rely upon:

- Contractual necessity

- Legitimate interest
- Vital interest
- Legal obligation
- Consent

There is a further lawful basis for processing personal data under data protection law, which is public task or 'public interest'. However, we are not a public authority, and therefore we will not normally rely on this basis for collecting, storing, or using your personal data.

Contractual necessity

Most of the information that we collect is used to manage a tenancy in accordance with your tenancy agreement, leasehold agreement or other contract, for example:

- Managing your rent account or payments.
- Managing the maintenance of our properties.
- Managing tenancies and licences to ensure that conditions are met, such as managing anti-social behaviour.
- Fulfilling other duties as a landlord.

Legitimate interest

We can legally process data if it is in the interests of LiveWest and our customers. If we do this, we will take account of any impacts on privacy or other interests which would weigh against us using the information. We regularly rely on this lawful basis when the reason for using your data meets our legitimate interests, except when the processing of the data would override the interests of our customers. Our legitimate interests could be:

- To prevent or detect crime.
- Conducting research to help improve our services, and to better understand the needs of our customers and their communities.
- To inform utility companies and council tax departments of occupants, occupancy dates, forwarding addresses and meter readings to ensure accurate billing. This could include documentation where necessary.
- Carrying out checks for fraud prevention.

Vital interests

In an emergency and in the interests of health, wellbeing, and safety, we may share your personal data. For example, we may share your information with the emergency services.

Legal obligation

We may use your data if we are required to do so by law. For example, we may be

required to provide evidence or information to the courts, our regulators, and through membership of the Housing Ombudsman Scheme. We may also process your data to meet our obligations set out by our regulators, and under housing law.

Consent

We may seek your consent, particularly if we need to obtain and hold special category data, which you can read more about in the special category data section below. Where we rely on your consent, we will always give you the option not to provide the information in question, or to refuse to agree to our use of it, or to 'prefer not to say'. We may also seek your consent to use your data for publicity or on promotional materials, such as photographs of you taken at a LiveWest event.

Where do we get your information, and when do we collect your personal data?

We may collect your personal data:

- As part of the lettings or sales process, either from yourself or other relevant agencies, such as through choice-based lettings or government schemes.
- When you or a household member contacts us.
- As part of the housing management process, including the management of your rent account.
- From third party organisations working on your behalf.
- From your feedback provided during customer research.

There may be circumstances where we may collect your personal data legally outside of this list.

Our main sources of personal data are:

- Yourself and other people in your home.
- Your neighbours.
- Our colleagues and systems.
- Other agencies we work with, for example local authorities involved in housing or benefits.

How do we use your personal data?

We may use your personal data for a number of reasons, including:

- Housing management, including letting and selling homes, and managing anti-social behaviour.
- Rent collection, housing benefit and collection of service charges.
- Ensuring billing is correct for utility companies and council tax departments.
- Recovering debt, including outstanding rent and repair recharges.
- Repair and maintenance of homes and other facilities.
- Meeting your health and support needs.

- Regulatory purposes such as meeting housing regulatory requirements.
- Research and customer insight purposes.
- Prevention and detection of crime.
- Equal opportunities monitoring.

There may be circumstances where we may collect your personal data legally outside of this list.

Who gets to see your personal data?

Usually only our colleagues see your personal data, and only when it is needed to be known. This can include colleagues from other companies in the LiveWest group, which are registered with the Information Commissioner. There are circumstances where we may share personal data with others, including:

- Our contractors.
- Agents such as our legal advisers.
- Agents contracted to carry out services on our behalf, including customer research.
- To other social and private landlords.
- To local authorities, such as the Council Tax and benefits departments.
- Government departments. This could include the Housing Ombudsman through membership of the scheme, regulators when required to do so by law, the Health & Safety Executive, and the Information Commissioners Office.
- To the police.
- To Local authorities and utility companies as part of the moving in and moving out process. This could include names of those responsible for paying the bills, tenancy start and end dates, and forwarding address. This could also include sharing copies of some documentation if necessary.

There may be circumstances where we may collect your personal data legally outside of this list.

Where we regularly share data with a third-party organisation, we have data sharing agreements and protocols in place.

We also share information with contractors who provide services on our behalf. We expect them to respect the security of your data in accordance with data protection law. We do not allow these contractors to use your personal data for their own purposes, and only permit them to use your data for a specific purpose in accordance with our instructions.

Our lawful basis for sharing your personal data

We may at times share relevant personal data with third parties for the purposes outlined above, or where we are legally obliged to. For more details on when we may share your personal data, please also refer to the additional privacy notice relevant to you.

When sharing personal data, we will comply with data protection law and will have a lawful basis to do so. The lawful bases for sharing data are:

- We have a contractual obligation.
- We have a legal obligation.
- We have a legitimate interest.
- It is in the legitimate interests of our customers or colleagues.
- We need to protect an individual's vital interests.
- It is in the public interest.

If none of the above apply, then we will seek your consent before we share your data.

When sharing special category data, we will ensure that it also meets one or more of the additional conditions for processing this type of data under data protection law.

Where we regularly share data with a third-party organisation, we have data sharing agreements and protocols in place.

We also share information with contractors who provide services on our behalf. We expect them to respect the security of your data in accordance with data protection law. We do not allow these contractors to use your personal data for their own purposes, and only permit them to use your data for a specific purpose in accordance with our instructions.

How can you find out what personal data we hold about you?

You can find out if we hold any personal information about you by making a 'subject access request' under the UK GDPR law. Further information on making a subject access request can be found in the Your Rights section of this privacy notice or via the [Information Commissioners Website](#).

Special Category Data

We may need to collect and use special category data about you.

Special category data includes information about your:

- Racial or ethnic origin.
- Political opinion.
- Religious or philosophical beliefs.

- Trade union membership.
- Physical or mental health conditions.
- Sexual orientation.

We may share your special category data to provide you with support or signpost you to other appropriate services. This could include sharing data to:

- Provide support due to sickness or disability.
- Safeguard and protect vulnerable people.
- Provide support with finances or benefits.
- Help with employment or training.
- Support families and children's needs.
- To promote social inclusion.

In addition to this we may occasionally share special category data with agencies, such as:

- The police.
- Local authorities.
- Health care, such as GP's or mental health services.
- Government departments. This could include the Housing Ombudsman through membership of the scheme, the Health & Safety Executive, and the Information Commissioners Office, when required to do so by law.
- As a housing provider we also have a legal obligation to provide special category data to monitor equal opportunities for statistical purposes. However, this does not relate to an individual person.

Special category data is only seen by LiveWest colleagues on a need to know basis. In general, we will not collect and use sensitive special category data about you unless it is necessary for housing purposes, to establish, exercise or defend legal rights, or there is a substantial public interest for us to do so.

We may use special category data to ensure your health and safety, and to safeguard your wellbeing, or where you are incapable of giving consent. Using your special category data is normally done with your knowledge. However, we do not routinely request your consent, and we do not require it to use this data. We may use and share special category data where it is permitted by data protection law, without obtaining consent.

Criminal Conviction Data

We may hold information about criminal convictions, however, we will only collect this information if it is appropriate to do so given the nature of the service that we provide, and where we are legally able. We may receive information about criminal convictions and offences where it is in the substantial public interest for us to know, or for bringing or defending legal claims.

Photographs and publicity

Occasionally we may place pictures of our properties and customers in promotional materials or in communications to colleagues and customers. We would only identify you specifically in pictures with your permission. Group photographs at company events may also be taken and placed in our newsletters, on our website or on social media. If you do not want your photograph to appear, then please advise the person taking the photograph, or contact us communications@livewest.co.uk to ask for the photograph to be removed from display.

CCTV

CCTV cameras are used in a variety of locations. When installing CCTV we follow good practice as set out by the Information Commissioner's Office and the Surveillance Camera Commissioner's code of practice. CCTV images are kept securely and normally deleted after 3 months. Access to CCTV is limited to colleagues members who have a legitimate reason to view it, and will only be shared with third parties, such as the police, under certain circumstances such as the prevention and detection of crime. Customers are not permitted to access LiveWest CCTV footage.

Marketing of LiveWest properties

If you express an interest in purchasing a Livewest property by contacting our Sales team or through our website, you are consenting to receive marketing updates about the property or properties that you have expressed an interest in purchasing. You can also opt-in to receive marketing information regarding developments in your area. We will only contact you regarding the properties that you have expressed an interest in, and you can opt-out at any time by contacting our Sales team by calling 0800 027 9801 or by email on newhomes@livewest.co.uk.

How do we keep your data secure?

We are committed to ensuring that your information is secure. To prevent unauthorised access or disclosure, we have put in place suitable physical, electronic, and managerial procedures to safeguard and secure the information we collect.

When you contact us through our Customer Service team, you will be asked to verify your identity via password, or by providing other personal data. Without this, we will not be able to discuss your account and may not be able to process your enquiry any further.

How long do we keep your data?

Different types of data are kept for varying lengths of time. However, we have a retention schedule which outlines how long we keep information relating to you. Our retention periods are based on regulatory and legal requirements.

Information that we collect when you make contact with us

When you contact LiveWest we may collect and retain certain information, for example, when you:

- Visit our website.

- Contact us by social media.
- Call our Customer Service team.
- Visit our offices.

Visiting our website

Our website uses Google Analytics to allow us to track how popular our site is, and to record visitor trends over time. Google Analytics uses a cookie to help track which pages are accessed. The cookie contains no personally-identifiable information, but it does use your computer's IP address to determine where in the world you are accessing the site from, and to track your page visits within the site. We may ask you to provide certain identifiable information to access certain areas of our website, for example we may ask you to provide your postcode so you can find out who your housing officer is.

From time to time, we may embed external content from third-party websites, for example Twitter or YouTube. These external websites may utilise cookies or other similar technologies, and the privacy notice that will apply to such third-party content will be published on the third-party providers website.

Our website may contain links to other websites, for example organisations which provide support. Once you have used these links to leave our site, you should note that we no longer have control of your personal data. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites as they are not governed by this privacy notice. You should look at the privacy statement applicable to the website in question if you have concerns.

Information that we collect when you call our Customer Service Team

When you call our Customer Service team we collect Calling Line Identification (CLI). We use this to help us improve efficiency and effectiveness.

Calls that are made to and from our Customer Service Team are recorded. Recordings are held within a secure system for 90 days after which they are deleted. However, some recordings may be saved for longer where calls have been abusive or where complaints have been raised or is likely to be. These calls will be saved while there is a business need to do so and can only be accessed by a senior manager.

Some calls transferred from the Customer Service team continue to be recorded, but this is dependent on the system into which it is being transferred. For example, if you are transferred to a member of colleague's mobile phone then the call will not be recorded.

How do we use call recordings?

Call recordings may be used to improve the quality of the service provided to our customers, and to support colleagues in carrying out their role. They will also be used to support the investigation of complaints, or to establish, exercise and defend legal rights.

When used for colleague training purposes in a public setting, recordings will not include any personal details that identify the caller, unless those involved on the recording have given consent. Monitoring of call recordings will only be undertaken by authorised personnel, for example a team leader or senior manager, who has a business need. Any playback of recordings will take place in a private setting.

Contacting our Customer Service team through our website, email, or social media

When you contact our Customer Service team through our website, email or social media, the information that you have provided will be transferred into the relevant housing management system. For example, if you contact us to report a repair, the information will be used within our systems to enable a repairs request to be raised. Emails and social media contacts may be copied and stored within your contact log.

Visiting our offices

When you visit our offices, we may collect the following personal data:

- Name, car registration number, and data relating to your visit. This is for fire safety purposes and is collected through a sign in and out book in our reception area.
- Images captured on CCTV. CCTV is installed in public areas within our offices. LiveWest follow good practise as set out by the Information Commissioners Office and The Surveillance Camera Commissioners code of practise when using CCTV. Footage is kept securely and deleted after three months. CCTV is installed to ensure the health, safety and security of all colleagues and visitors to our offices.

Contact Us

If you have any concerns about how we handle your personal data, you can get in touch with our data protection team or data protection officer:

Email: data.protection@livewest.co.uk

Call: 0300 123 8080

Or you can write to:

LiveWest
1 Wellington Way
Exeter
EX5 2FZ

You can also find more information about your data protection rights by looking at the Your Rights section of this privacy notice or on the [Information Commissioners Office \(ICO\)](#)

[website](#), which includes information on how you can raise a concern with them.