Privacy and Confidentiality

Information about us:

Capture Housing Limited Limited Company, Registered in England under company number **10970280** Registered address: 37 Commercial Road, Poole, Dorset, United Kingdom, BH14 OHU

What is personal data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers. The personal data that we use is set out below.

What are your rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- 1. The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 12.
- 2. The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- 3. The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 12 to find out more.
- 4. The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 12 to find out more.
- 5. The right to restrict (i.e. prevent) the processing of your personal data.
- 6. The right to object to us using your personal data for a particular purpose or purposes.
- 7. The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- 8. Rights relating to automated decision-making and profiling. We do not use your personal data in this way.



For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided below.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

What personal data do we collect?

We may collect some or all of the following personal data (this may vary according to your relationship with us):

- Name;
- Date of birth;
- Gender;
- Address;
- Email address;
- Telephone number;
- Payment information;
- Information about your preferences and interests;
- Information about your housing status and needs.

How do we use your data?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for one of the following purposes:

- Providing membership services to you.
- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information by email, post or messaging services that you have opted-in to (you may unsubscribe or opt-out at any time by contacting us using the details in section 12).

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email, telephone, text message or post with information, news, and offers on our services. You will not be sent any unlawful marketing or spam. we will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

How long will we keep your personal data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- Data held in connection with financial records (for instance relating to payments for our services) will be kept for 10 years;
- Data held in connection with membership services to you will be held for 2 years after ceasing activity

How do we store or transfer your data?

We may store or transfer some or all of your personal data in countries that are not part of the European Economic Area (the "EEA" consists of all EU member states, plus Norway, Iceland, and Liechtenstein). These are known as "third countries" and may not have data protection laws that are as strong as those in the UK and/or the EEA. This means that we will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR as follows.

We use specific contracts with external third parties that are approved by the European Commission for the transfer of personal data to third countries. These contracts ensure the same levels of personal data protection that would apply under the GDPR. More information is available from the European Commission.

Where we transfer your data to a third party based in the US, this may be protected if they are part of the EU-US Privacy Shield. This requires that third party to provide data protection to standards similar levels of data protection to those in Europe. More information is available from the European Commission.

Please contact us using the details below in Part 12 for further information about the particular data protection mechanism used by us when transferring your personal data to a third country.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- Use of secure connections (SSL) when transferring your data to remote ("cloud") storage servers.
- Password protection on personal computers on which data is stored.
- Encryption of files containing particularly sensitive data.

How do we share your personal data?

We will not share any of your personal data with any third parties for any purposes unless separately agreed with you, subject to one important exception.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

How can you access your personal data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 12.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will endeavour to respond to your subject access request within 14 days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

How do I make contact about my personal data?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Email address: office@capturehousing.com Postal Address: Unit 1 Bembridge Marine, Embankment Road, Bembridge, PO35 5NS