

Privacy Policy

Introduction

This Privacy Policy explains how Spruce (part of Southern Housing Group) will use the personal data you provide to us.

In this policy when we refer to the 'website' we mean any of our websites or any other development specific websites, such as <https://www.sprucehomes.co.uk/> <https://tabardstreet.co.uk/> <https://causewayliving.co.uk/> <https://featherstone-lettings.co.uk/> and https://essexbrewery-lettings.co.uk

The term "personal data" refers to personally identifiable information about you, such as your name, date of birth, email address or mailing address and telephone number.

Summary

We receive personal data relating to you from you directly, but it may also be provided to us by third parties with whom you have a separate relationship.

By submitting personal data manually or in electronic form to us and/or by using our site you give your consent that all personal data that you submit may be processed by us in the manner and for the purposes described in this policy.

We provide your personal data to third parties for our limited business purposes or as permitted by law.

We use your data to provide services to you, correspond with you, meet our legal obligations and improve this site and our products and services.

We store data for specified periods for our limited business purposes.

You have certain rights, prescribed by law, in relation to the processing of your data, such as rights to request access, rectification or deletion of your personal data.

The site uses cookies to monitor traffic to improve the user experience, to improve the site and to monitor the effectiveness of our advertising. Acceptance of cookies may be required in order to complete some actions such as submitting applications.

You can contact our Data Protection Officer by writing to Southern Housing Group, Fleet House, 59-61 Clerkenwell Road, London, EC1M 5LA or by email at data.protection@shgroup.org.uk

Notification of changes to this policy

We are continually improving our methods of communication and adding new functionality and features to this site. Because of these ongoing changes, changes in the law and the changing nature of technology, our data practices will change from time to time.

If and when our data practices change, we will (as soon as practicable) post the changes on this site to notify you of the changes. We encourage you to check this page frequently.

What information do we collect?

You may use this site to register to receive additional information or services from us. We store the information you give us manually or electronically in our databases. When you register, we ask you for contact information like your name, postal address and email address.

Use of personal data

We will process your personal data in order to promote our products and services. We will use your personal data to develop the site to include more material that you like, and to introduce new features.

We may process the information you provide voluntarily. This includes your names and identifying information, address and contact details, demographic details (optionally including sensitive personal data such as your faith, ethnic background and/or sexuality) and details of your domestic circumstances and finances. The legal basis for this processing is to take steps, at your request, to enter into a contract for the provision of the property or a service.

We may process your personal data that you have provided for the use of our services ('service data'), whether by you or by any third party with whom you and we have a separate contractual relationship. The legal basis for this processing is either:

- The performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract
- Where we have no contract with you, you have consented to such processing in relation to any contract you may have in place with the relevant third party.

We may process information contained in any enquiry you submit to us regarding products and/or services ('enquiry data'). This may be processed for the purposes of offering, marketing and selling housing and other relevant products and/or services to you. The legal basis for this processing is your consent.

We may send you marketing information relating to properties of a type and/or in a location in which you have expressed an interest. The legal basis for this processing is our legitimate interests in marketing our housing and other service offerings, where permitted, or your explicit consent to receive these communications.

It's your choice

If you do not wish to receive information from us and want to be removed from our standard mailing list, please click the 'unsubscribe' button from the bottom of the email or email us at sales@shgroup.org.uk

Your Rights

For a full explanation of your rights you can read guidance from the Information Commissioner's Office at <https://ico.org.uk/>

In summary, your principal rights under data protection law are:

- the right to access
- the right to rectification
- the right to erasure
- the right to restrict processing
- the right to object to processing
- the right to data portability
- the right to complain to a supervisory authority
- the right to withdraw consent.

You have the right to confirmation as to whether or not we process your personal data and, where we do, to access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.

You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

In some circumstances you have the right to the erasure of your personal data. These might include if:

- the personal data is no longer necessary for the purposes for which it was collected or otherwise processed
- you withdraw consent to consent-based processing
- the processing is for direct marketing purposes

However, there are certain general exclusions of the right to erasure, for example where processing is necessary for compliance with a legal obligation or in connection with legal claims. In some circumstances you have the right to restrict the processing of your personal data.

Where processing has been restricted on this basis, we may continue to store your personal data and will observe the restrictions on processing except in the case of processing permitted by applicable law (for example, in connection with legal claims or for reasons of public interest).

You have the right to object to our processing your personal data on grounds relating to your particular situation, but only that the legal basis for the processing is that it is necessary for:

- the performance of a task carried out in the public interest or in the exercise of any official authority vested in us

- the purposes of the legitimate interests pursued by us or by a third party

If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or if the processing is for legal claims.

You have the right to object to us processing your personal data for direct marketing purposes, including profiling for direct marketing purposes. If you make such an objection, we will cease to process your personal data for this purpose.

To the extent that the legal basis for our processing of your personal data is consent, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the United Kingdom, the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

You may exercise any of your rights in relation to your personal data by written notice to us.

Anonymous data collected through this site

We collect anonymous information about the use of our site. For example, we use technology to track which pages of our site our visitors view and to compile statistics about our visitors and their use of our site. We use technology to track how often hyperlinks are used and which pages on our site our visitors choose to view.

Cookies

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies may be either 'persistent' cookies or 'session' cookies. A persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date. A session cookie will expire at the end of the user session, when the web browser is closed.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies. Cookies tell us which parts of the site you visit and how long you spend on each page. In order to collect the anonymous data described in the preceding paragraph, we may use temporary cookies that collect the first level domain name of the user (for example, if your email

address is john@bigmail.com, the cookie collects the bigmail.com portion of your email address) and the date and time you accessed this site.

We also use your IP address to help diagnose problems with our server and to administer our site. An IP address is a numeric code that identifies your computer on a network, or in this case, the Internet. Your IP address is also used to gather broad demographic information, such as determining how many of our visitors are from outside the UK.

We use Google Analytics to analyse the use of the site. Google Analytics gathers information about website use by means of cookies. The information gathered relating to the site is used to create reports about the use of the site. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>.

Disclosure of your personal data

We may disclose your personal data with third parties who act for us for further processing in accordance with the purposes for which the data was originally collected or for purposes to which you have subsequently consented. For example, sometimes a third party may have access to your personal data in order to handle mailings on our behalf.

We may share or transfer the information in our databases to comply with a legal requirement, for the administration of justice, to protect your vital interests, to protect the security or integrity of our databases or this site, to take precautions against legal liability, or in the event of our sale, merger, reorganisation, dissolution or similar event.

We may share or transfer the information in our databases for marketing purposes with our associated or subsidiary companies.

We may disclose your personal data to our insurers and/or professional advisers as necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice and managing legal disputes.

We may disclose personal data to our suppliers or subcontractors, or to third parties with whom you have a contractual relationship, such as local authorities or utility providers, where reasonably necessary for the performance of any contract with you. This applies whether that contract is entered into between you and us, or between you and a third party.

We may also disclose your personal data for compliance with a legal obligation, or in order to protect your vital interests or the vital interests of another person.

Where appropriate, before disclosing personal data to a third party, we contractually require the third party to take adequate precautions to protect that data.

Data integrity and security

We strive to maintain the reliability, accuracy, completeness and currency of personal data in our databases and to protect the privacy and security of our databases. We keep your personal data only for as long as reasonably necessary for the purposes for which it was collected.

Our servers and our databases are protected by industry standard security technology, such as network address translation and password protection.

The employees who have access to personal data have been trained to handle such data properly and in accordance with our security protocols and strict standards of confidentiality. Although we cannot guarantee against any loss, misuse, unauthorised disclosure, alteration or destruction of data, we try to prevent such unfortunate occurrences.

Data access and corrections

Upon receipt of your written request and enough information to permit us to identify your personal data we will disclose the personal data we hold about you. We will also correct, amend or delete any personal data that is inaccurate and notify any third party recipients of the necessary changes.

You may at any time request that your personal data be corrected or deleted by writing to the Data Protection Officer, Southern Housing Group, Fleet House, 59-61 Clerkenwell Road, London, EC1M 5LA or email data.protection@shgroup.org.uk We may charge a small fee to cover costs in complying with a request for a copy of any personal data held.

Links to other websites

This site contains hyperlinks to websites that are not operated or supervised by us. This privacy policy will not apply to information collected on those sites, so we urge you to review any privacy policy posted on any site you visit before using the site or providing any personal data about yourself.

Transfer of data abroad

The Internet is made up of a large number of international connections. If you are visiting this site from a country outside of Europe, the various communications will necessarily result in the transfer of information across international boundaries. By visiting this site and communicating electronically with us, you consent to these transfers.

Governing Law

This Privacy Policy forms part of our terms of use ("Conditions") and as such shall be governed by and construed in accordance with the laws of England. You agree to submit any dispute arising out of your use of this site to the exclusive jurisdiction of the courts of England.

Questions

If you have any questions about this Privacy Policy or concerns about the way we process your Personal Data, please contact the Data Protection Officer, at Southern Housing Group, Fleet House, 59-61 Clerkenwell Road, London, EC1M 5LA or by emailing data.protection@shgroup.org.uk