



Catalyst Housing Ltd and Aldwyck Housing Group Limited

Privacy statement for equity loan applicants

1 May 2019

Key points:

- **Why do we use your data?** We typically only use your information to assess your eligibility for an equity loan.
- **Special categories of data:** In order for us to assess your eligibility for an equity loan, and in undertaking diversity monitoring, we may process your special category personal data, such as your race and ethnicity and whether you consider yourself to have a disability.
- **Sharing your data:** We will only share your data with our third party service providers, subsidiaries and other entities in the group, your relevant local authority or with other organisations if required by law.
- **Security:** We respect the security of your data and treat it in accordance with the law.
- **International transfer:** We shall not transfer your personal data outside of the European Economic Area.

1 Purpose of our privacy statement

1.1 Under data protection legislation, we are required to explain to you why we collect information about you, how we intend to use that information and whether we will share your information with anyone else.

1.2 This privacy statement applies to all applicants (and joint applicants), whether successful or not, who apply through:

1.2.1 Catalyst Housing Ltd for any of the following schemes: Elmbridge Borough Council "Homeownership Assistance" Equity Loan Scheme, South Bucks District Council "YourChoice" Equity Loan Scheme, Oxford City Council Equity Loan Scheme for Teachers or the South Oxfordshire District Council Equity Loan Scheme;

1.2.2 Aldwyck Housing Group Limited for any of the following schemes: Herts County Council for the Herts County Council Starter Home Initiative 2 Scheme

1.3 It is important that you read this statement so that you know how and why we use information about you. It is also important that you inform us of any changes to your personal information so that the information which we hold is accurate and current.

2 Who are we?

2.1 We are:

2.1.1 Catalyst Housing Ltd (**Catalyst**), registered office Ealing Gateway, 26–30 Uxbridge Road, London W5 2AU; and

2.1.2 Aldwyck Housing Group Limited (**Aldwyck**), registered office Ealing Gateway, 26–30 Uxbridge Road, London W5 2AU.

2.2 Any reference to “we”, “our” or “us” in this statement is a reference to both Catalyst and Aldwyck.

2.3 We are "data controllers", meaning that we are responsible for deciding how we hold and use personal information about you.

3 The merging of Catalyst and Aldwyck

3.1 Catalyst and Aldwyck are merging and further information about how this will affect you can be found here: <https://www.chg.org.uk/our-business/catalyst-and-aldwyck/catalyst-and-aldwyck-information-for-customers/>

3.2 In the short term, Catalyst and Aldwyck will remain as two separate entities, with Aldwyck a subsidiary of Catalyst. Eventually, Catalyst and Aldwyck will combine to create a single entity.

3.3 This privacy statement has been updated to explain how your personal information will be effected during the merger process (i.e. whilst Catalyst and Aldwyck are two separate entities), which we expect to be finalised by April 2021. Once the merger is complete, we will provide you with an updated privacy statement.

3.4 If you are an **equity loan applicant of Aldwyck**, your personal information will be gradually migrated to Catalyst during the merger process, and that information may be processed by Catalyst where this is necessary for any of the reasons set out below at paragraph 8. As this progresses, we will be providing you with regular updates.

3.5 If you are an **equity loan applicant of Catalyst**, your personal information will remain on Catalyst's systems and will not be transferred to Aldwyck. During the merger process, as Catalyst and Aldwyck will be gradually sharing information systems, your information may be accessed by Aldwyck (as a Catalyst subsidiary) where this is necessary for any of the reasons set out below at paragraph 8.

4 **Our Data Protection Officer**

4.1 Our Data Protection Officers are responsible for overseeing what we do with your information and monitoring our compliance with data protection laws.

4.2 If you have any concerns or questions about our use of your personal data you can contact our Data Protection Officer by writing to The Data Protection Officer, Catalyst Housing, Ealing Gateway, 26–30 Uxbridge Road, London W5 2AU or by emailing: data.protection@chg.org.uk

5 **Why are we collecting your information?**

5.1 If you apply for an equity loan through us (whether as an applicant or joint applicant), then we will collect and use the information you provide to us during the application process in order to assess your eligibility for an equity loan. Once we have assessed your eligibility, this information is passed to the relevant local authority to administer the equity loan scheme.

6 **Types of personal information we use**

6.1 We collect the following information as part of the application process:

6.1.1 **personal details** (such as your title, name, gender and date of birth);

6.1.2 **contact details** (such as your address, telephone numbers and email address);

6.1.3 your **marital status** and information about **your relationship** with joint applicants and any people you intend to live with;

6.1.4 information about your **current and previous living arrangements** (such as length of time at current address, accommodation type, housing status, your landlord's name and contact details if you are living in private rented accommodation, previous addresses and proof of address);

6.1.5 information about **current/previously owned property**;

- 6.1.6 **employment information** (such as job title, employment status, employment start/end date, employer's name and address, the area you work in and which sector you work in);
- 6.1.7 information about your **qualifications** where you are a teacher or social worker;
- 6.1.8 **financial information** (such as your income, savings, loans and financial history); and
- 6.1.9 any additional information contained on the **supporting documentation** you provide with your application form.

Special categories of personal data

- 6.2 Some of the information we collect about you are special categories of personal data. Special categories of personal data require a higher level of protection. The special categories of personal data that we may collect about you via the application process are:
 - 6.2.1 your **race or ethnicity** (in order for us to assess your eligibility for an equity loan, we need you to confirm your citizenship status and country of origin, which may indicate your race or ethnicity);
 - 6.2.2 your **sexual orientation** (this may be apparent when confirming your relationship to the people you intend to live with (if any)); and
 - 6.2.3 information about **criminal convictions and offences** (for example when declaring whether you have ever had a County Court Judgment registered against you).
- 6.3 If you choose to help us undertake diversity monitoring by completing the relevant section of the form, we may also collect the following information about you (which may overlap with some of the information referred to above):
 - 6.3.1 your **race and ethnicity**;
 - 6.3.2 your **sexual orientation**;
 - 6.3.3 your **religious beliefs**; and
 - 6.3.4 information about your **health** (whether you consider yourself to have a disability).

7 Source of your personal information

7.1 We collect the above information about you from you directly on your application form and any documents you provide to us in support of your application (e.g. utility bill, tenancy agreement and/or payslip). We may also collect information about you from third parties, such as credit reference agencies and your current or previous landlord or employer.

8 How and why we use your personal data

8.1 We use the types of personal data listed above for a number of purposes, each of which has a "lawful basis". In accordance with the data protection laws, we need a "lawful basis" for collecting and using information about you. There are a variety of different lawful bases for using personal data which are set out in the data protection laws.

8.2 We have set out below the different purposes for which we collect and use your personal data, along with the lawful bases we rely on to do so.

Why we use your information	Our lawful basis for using your information
To assess your eligibility for an equity loan.	Contract: It is necessary to use your personal data in order to take steps to enter into a contract with you. Consent: Where you have provided your explicit consent for us to use your personal data.*
If deemed eligible, to provide you with the equity loan.	Contract: It is necessary to use your personal data in order to take steps to enter into a contract with you. Consent: Where you have provided your explicit consent for us to use your personal data.*
Diversity monitoring	Consent: Where you have provided your explicit consent for us to use your personal data.*
Law enforcement and investigations: We may share your personal data with law enforcement agencies where we deem it necessary to do so.	Legal obligation: it is necessary in order for us to comply with legal obligations.

Why we use your information	Our lawful basis for using your information
<p>* This is an additional lawful basis which we need to rely on in order to use special categories of data such as information about your health</p>	

9 What may happen if you do not provide your personal information?

- 9.1 If you do not provide the necessary information requested in the application form we may not be able to assess your eligibility for an equity loan and your application will be returned to you.
- 9.2 If you decide not to provide the information requested in the 'diversity monitoring' section of the application form, we will still assess your eligibility for an equity loan and your application will not be affected in any way.

10 Complying with data protection law

- 10.1 We will comply with data protection law. At the heart of data protection laws are the "data protection principles" which say that the personal information we hold about you must be:
- 10.1.1 used lawfully, fairly and in a transparent way;
 - 10.1.2 collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
 - 10.1.3 relevant to the purposes we have told you about and limited only to those purposes;
 - 10.1.4 accurate and kept up to date;
 - 10.1.5 kept only as long as necessary for the purposes we have told you about; and
 - 10.1.6 kept securely.

11 Sharing your information

- 11.1 We will share your information with your relevant local authority (who we operate the relevant equity loan scheme in conjunction with), which will be either:
- 11.1.1 **Herts County Council** for the Herts County Council Starter Home Initiative 2 Scheme;

- 11.1.2 **Elmbridge Borough Council** for the Elmbridge Borough Council "Homeownership Assistance" Equity Loan Scheme;
 - 11.1.3 **South Bucks District Council** for the South Bucks District Council "YourChoice" Equity Loan Scheme;
 - 11.1.4 **Oxford City Council** for the Oxford City Council Equity Loan Scheme for Teachers; or
 - 11.1.5 **South Oxfordshire District Council** for the South Oxfordshire District Council Equity Loan Scheme.
- 11.2 We will share your personal information with other third parties where we have a lawful basis for doing so.
- 11.3 Some "third parties" are service providers (including contractors and designated agents) carrying out activities on our behalf. Other third parties will be data controllers in their own right. This means that they are not required to act on our instructions and they are solely responsible for ensuring that they comply with the law when using your personal data. We are not responsible for their use of your data if we are acting lawfully whenever we share your data with them.
- 11.4 The types of organisations with whom we may share your personal information include:
- 11.4.1 third party services providers, including IT services;
 - 11.4.2 credit reference agencies;
 - 11.4.3 your current or previous landlord or employer in order to obtain a reference;
 - 11.4.4 funders eg Homes England, local authorities;
 - 11.4.5 Government appointed Help to Buy agents;
 - 11.4.6 the electoral register;
 - 11.4.7 solicitors (both yours and ours);
 - 11.4.8 panel-approved independent financial advisors;
 - 11.4.9 other registered providers;
 - 11.4.10 estate agents who may be able to assist in locating appropriate properties;

- 11.4.11 the Police and other law enforcement agencies for the purposes of crime prevention or detection; and
- 11.4.12 the Department for Communities and Local Government and agencies working on our and their behalf for statistical surveys, where you have elected to provide diversity monitoring information.

11.5 We will share your personal information with subsidiaries and other entities in our group as part of our regular reporting activities on company performance, business reorganisation, group restructuring, system maintenance support and/or hosting of data.

11.6 We will share your personal information with third parties where required by law or where we have another legitimate interest in doing so (for example for the prevention or detection of crime).

12 Transferring your information outside the European Economic Area

12.1 We shall not transfer your personal data outside of the European Economic Area.

13 Can we use your information for any other purpose?

13.1 We typically will only use your personal information for the purposes for which we collect it. In limited circumstances we may use your information for a purpose other than those set out in this policy. If we intend to do so, we will provide you with information relating to that other purpose before using it for the new purpose.

13.2 We may use your personal information without your knowledge or consent where such use is required or permitted by law.

14 Storing your information and deleting it

14.1 We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal information are available in our retention policy which is available from our Data Protection Officer, by writing to The Data Protection Officer, Catalyst Housing, Ealing Gateway, 26–30 Uxbridge Road, London W5 2AU or emailing data.protection@chg.org.uk.

14.2 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 requirements.

14.3 In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

14.4 Once we no longer have a lawful basis for holding your personal data, we will securely destroy your personal information in accordance with our data retention policy.

15 Your rights

15.1 In certain circumstances, by law you have the right to:

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

15.1.2 **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

15.1.3 **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).

15.1.4 **Object to processing** of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.

15.1.5 **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

15.1.6 **Request the transfer** of your personal information to another party in certain circumstances.

15.2 If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact our Data Protection Officer by writing to The Data Protection Officer, Catalyst Housing, Ealing Gateway, 26–30 Uxbridge Road, London W5 2AU or emailing data.protection@chg.org.uk.

16 Right to withdraw consent

16.1 In the circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact our Data Protection Officer. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

17 Right to complain to the ICO

17.1 You also have the right to complain to the Information Commissioner's Office (the "ICO") if you are not satisfied with the way we use your information. You can contact the ICO by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

18 Changes to this privacy statement

18.1 We reserve the right to update this privacy statement at any time and we will provide you with a new privacy statement when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.