

# Almshouse and Sheltered Housing Resident Applicant and Resident Privacy Statement

## 1. Introduction

With a rich history dating back over 700 years, the Mercers' Company is focussed on being a philanthropic force for good and philanthropy is at the core of its past, present and future. It donates millions each year to charitable causes, with a particular focus on young people and education, older people and housing, and church and communities. It is also a Corporate Trustee or shareholder of a number of charities and provides services to them.

The Mercers' Company is committed to being transparent about how it collects and uses personal data and to meeting its data protection obligations. The Company collects and processes personal data relating to its Resident Applicants for Almshouse and Sheltered Housing to manage the application for housing process. The Mercers' Company collects and processes personal data relating to Residents of Almshouse and Sheltered Housing to manage its relationship with its Residents. The Company is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

## 2. What information does the Company collect?

If you are an Resident Applicant for Housing the Company collects and processes a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number, date of birth and gender, family data, including contact details of your next of kin;
- financial data;
- Special category data, health data.

If you are a Resident the Company collects and processes a range of information about you. This includes:

- your name, address and contact details, email address and telephone number, date of birth, gender, marital status, next of kin, dependants and emergency contacts;
- your bank account details, expenditure, government paid allowances and pension data;
- family information and contact details;
- Personal statement data to support your needs and personal interests;
- Photographic records and CCTV recordings;
- information about your criminal record;
- information about your GP, medical or health conditions;
- Safeguarding records;
- EDI information, (your ethnic origin, health, sexual orientation and religion or belief).

The Company collects this information in a variety of ways. For example, data is collected through application forms, your passport or other identity documents; from forms completed by you, from correspondence with you, or through interviews and meetings. In some cases, the Company collects personal data about you from third parties, such as other housing providers and local authorities.

Data is stored in a range of different places, including in your file, in the Company's management system, Salesforce and in other IT systems (including the Company's email system). 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.

### **Visitors to the Company website**

In the course of an individual using the Company website, [www.mercers.co.uk](http://www.mercers.co.uk) we may collect the following personal information:

- Identity data
- Contact Data includes email address.

### **3. Why does the Company process personal data?**

#### ***For Resident Applicants***

If you are Resident Applicant we will use your personal information in order to consider your application to become a resident of one of our almshouses or sheltered accommodation sites. We will also use your data to administer an agreement we enter into with you in relation to you becoming a resident at one of our Alshouse or sheltered housing schemes.

#### ***For Residents***

The Company needs to process data to enter into an agreement with you in relation to you being a resident of one of our almshouses or sheltered accommodation sites. We all required the data to ensure that we are providing the services you are entitled to as a resident. We will only use special category data for example health data with your explicit consent.

#### ***Website users***

For website users we will use your personal information to administer any enquiry that you have submitted.

If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose please contact our Data Compliance Manager.

### **4. Who has access to data?**

Your information may be shared with our executive team if access to the data is necessary for the performance of their role. The Company may also share your data with third parties, based in the UK who provide IT and system administration services. In addition the Company may share your personal data with selected third party suppliers, professional advisors acting as processors or joint controllers including local authorities for safeguarding purposes and the police.

The Company will not transfer your data to countries outside the UK.

### **5. How does the Company protect data?**

The Company takes the security of your data seriously and has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties as outlined in the Company's Data Protection Policy. Where the Company engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

### **6. For how long does the organisation keep data?**

The Company will hold your personal data for a period of time to fulfil the collection purposes, including satisfying any legal, accounting or reporting requirements.

## 7. What if you do not provide personal data?

You are required to provide certain information, such as contact details, financial information, to enable the Company to consider you for housing and to provide you with resident services. If you do not provide the information required, the Company will be unable to administer the services and entitlements of its residents.

## 8. CCTV

The Mercers' Company processes CCTV footage in adherence to the ICO's CCTV Code of Practice without your consent for our own legitimate business purposes of your safety and security. The CCTV system monitors the exterior of the building and specific areas internally 24 hours a day primarily for the security of our staff, residents and Company assets. This data is recorded and retained for 90 days unless the data is being used to investigate an alleged incident or crime. We reserve the right to review the data recorded on our CCTV system for the following purposes (this list is not exhaustive):

- (a) To comply with any legal obligations;
- (b) To assist in the investigation of wrongful acts; and
- (b) To ensure that employees, residents and other legitimate users of the almshouse and sheltered housing schemes are complying with our policies and procedures.

We provide view-only access to CCTV footage for third parties that provide security patrols around our properties. CCTV recordings are stored securely in controlled premises.

## 9. Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the Company to change incorrect or incomplete data;
- require the Company to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where the Company is relying on its legitimate interests as the legal ground for processing; and
- ask the Company to stop processing data for a period if data is inaccurate or there is a dispute about whether your interests override the organisation's legitimate grounds for processing data.

If you have any queries regarding this privacy statement or would like to exercise any of these rights, please contact the **Company's Data Compliance Manager:**

Chris Whyte Principal Staff Officer

[Chrisw@merciers.co.uk](mailto:Chrisw@merciers.co.uk)

0207 726 4991

You can make a subject access request by contacting the Company's Data Compliance Manager.

If you believe that the Company has not complied with your data protection rights, you can complain to the [Information Commissioner](#).