



### Privacy Statement (CHC Board Members)

#### Identity and contact details of data controller

Community Housing Cymru (collectively referred to as "CHC" "we", "us" or "our" in this notice) is an umbrella body of housing associations in Wales. As an organisation, we seek to:

- Influence government policy
- Support and promote the work of our members
- Be a voice for the sector

CHC is a registered "data controller" (ZA334456). This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to current and former board members.

It is important that you read and retain this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information and what your rights are under data protection legislation.

#### Our details:

If you have any questions about this privacy notice or how we handle your personal information, please contact us in the following ways:

Postal address: Community Housing Cymru, 2 Ocean Way, Cardiff, CF24 5TG

Telephone number: 02920674810

Email address: [privacy@chcymru.org.uk](mailto:privacy@chcymru.org.uk)

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

CHC is a registered charity in Wales (1128527).



### Personal data we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

As an organisation, we will only hold personal information that is essential for us to facilitate your role as a Board Member.

As such, we will collect, store and use the following personal information from you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Gender.
- Next of kin and emergency contact information.
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process).
- Disciplinary and grievance information.
- Information about your use of our information and communications systems.
- Photographs.
- Technical data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access Decision Time, our board portal.
- Profile data includes your username and password, your feedback and responses and your photograph (if applicable) from Decision Time, our board portal.

We may also collect, store and use the following more sensitive types of personal information:

- Information about your race or ethnicity, religious beliefs and sexual orientation.
- Information about your health, including any medical condition, health and sickness records

### How we collect your data

We collect personal information about board members through the application and recruitment process directly from candidates. We sometimes collect additional information from third parties including former employers.

We may receive technical and profile data from Decision Time, a provider of integrated board portal software.



**Legal basis for processing and how we use your data**

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the contract we have entered into with you.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for legitimate interests pursued by us or a third party and your interests and fundamental rights do not override those interests.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

<b>Purpose/Activity</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
Making a decision about your appointment	Performance of a contract with you
Business management and planning, including arranging meetings and distributing information prior to the meetings. This is predominately done via our board portal Decision Time.	Necessary for our legitimate interests (to run our organisation and inform our strategy)
Making decisions about your continued engagement	Performance of a contract with you  Necessary for our legitimate interests (to run our organisation and inform our strategy)
Complying with health and safety obligations	Necessary to comply with a legal obligation
Dealing with grievance, disciplinary or legal disputes involving you, or other board members, employees and contractors	Necessary for our legitimate interests (to deal with grievance or disciplinary hearings and to commence or defend legal proceedings)  Necessary to comply with a legal obligation
To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution	Necessary for our legitimate interests (for running our organisation, provision of administration and IT services, network security, to prevent fraud)



To demonstrate that there has been a fair and transparent process in your appointment including equal opportunities monitoring

Necessary to comply with a legal obligation

**If you fail to provide personal information**

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you, or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

**How we use particularly sensitive personal information**

In general, we will not process particularly sensitive personal information about you unless it is necessary for performing or exercising obligations or rights in connection with your engagement. On rare occasions, there may be other reasons for processing, such as it is in the public interest to do so.

The situations in which we will process your particularly sensitive personal information include:

- We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to provide appropriate workplace adjustments, for example whether adjustments need to be made when you attend board meeting.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

**Recipients and data security**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

All applications for a board position will be sent directly to our Executive Support Officer. The application will be saved on our secure system with limited staff access, and will be shared with the interview panel in hard and electronic copy.

The Executive Support Assistant and the Senior Management Group are the only individuals who have access to recruitment records.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.



### Data sharing

We will only share your personal information with third parties where required by law, where we have a legitimate interest in doing so or where we are explicitly asked by you to do so.

We may share your personal data with the following third-parties for the purposes set out in the table above:

- Esteiro Business Solutions Limited trading as “Goldvision” – a service provider based in the UK who provides system administration services.
- Sabre Computer and IT Services Ltd – a service provider based in the UK who provides IT services/supplies.
- User Fusion Ltd based in the UK who provide website design and development services.
- Decision Time Ltd based in the UK who provide board portal software services.
- Professional advisers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- The Charity Commission for England and Wales, HM Revenue & Customs, regulators and other authorities based in the UK who require reporting of processing activities in certain circumstances.

We have contracts in place with third-party processors which means that they will only use your data in ways we have instructed them to do so. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

We also use the application ‘Doodle Poll’ to arrange meetings.

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

### International transfers

Some of our third-party processors are based outside the European Economic Area (EEA) so their processing of your personal data may involve a transfer of data outside the EEA.

Where we engage third parties whose processing of your personal data will involve a transfer of data outside the EEA, we will ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- We may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.



### Retention period

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.

We retain personal information of a board member for a period of 6 months after the board member has resigned from their position. After this period, we will securely destroy your personal information in accordance with applicable laws and regulations.

### Individual rights

Under certain circumstances, by law you have the right to:

- **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. Please contact us by email at [privacy@chcymru.org.uk](mailto:privacy@chcymru.org.uk) with the subject title 'Subject Access Request'. We will require you to provide two pieces of ID to ensure that we are giving the information to the right person. We will respond to your request within one month. There is no charge for a subject access request, but repeated and burdensome requests may incur a charge.
- **Request rectification** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.– Please contact [privacy@chcymru.org.uk](mailto:privacy@chcymru.org.uk) with the subject title 'Data Rectification' and we will deal with your enquiry within 10 working days.
- **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. Please contact [privacy@chcymru.org.uk](mailto:privacy@chcymru.org.uk) with the subject title 'Data deletion' and we will deal with your enquiry within 10 working days. However, as a result, we may no longer be able to communicate with you as a board member, and may have to ask you to step down.
- **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. Please contact us by email at [privacy@chcymru.org.uk](mailto:privacy@chcymru.org.uk) with the subject title 'Data Processing Restriction' and we will deal with your enquiry within 10 working days.
- **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. Please contact us by email at [privacy@chcymru.org.uk](mailto:privacy@chcymru.org.uk) with the subject line 'Objection to Processing' and we will deal with your enquiry within 10 working days.



- **Request the transfer** of your personal information to another party. If you wish to request a transfer, please contact us by email at [privacy@chcymru.org.uk](mailto:privacy@chcymru.org.uk) with the subject line 'Transfer Request' and we will deal with your enquiry within 10 working days.